THE PORTSMOUTH GRAMMAR SCHOOL

The PGS Privacy Notice for PGS Website

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Privacy Notice

This privacy notice (**This Notice**) explains how personal information is collected, used, and disclosed by **Portsmouth Grammar School** (collectively, **Portsmouth Grammar School**, **we**, **our** or **us**). This Notice applies to visitors and users (individually, **you**) of the **Portsmouth Grammar School**'s website. By visiting or using the Site to the extent permitted by applicable law, you are consenting to us gathering and processing information about you in accordance with this Notice, although consent may not be required for all of the elements described in this Notice. For particular types of information or processing, we may provide you with choices or request your further consent related to what information we collect and how we may process it.

This Notice does not cover third parties or their services, and we do not take any responsibility for how such third parties may use any information they collect. For information about third-party privacy practices, please consult with them directly.

This Notice relates specifically to personal data collected through our website. For information about how the School processes personal data more broadly (including pupil, parent, staff, safeguarding and educational records), please refer to the School's full Privacy Notice available on our main website

Children's Data

Our website is intended to provide information to current and prospective families. We do not knowingly collect personal data from children directly through the website, except where it is provided by parents or guardians as part of an enquiry or application process. All processing of children's data complies with our safeguarding and statutory obligations

1. Who we are

The Portsmouth Grammar School (**PGS, we, our, us**) is the Data Controller responsible for the personal data processed in connection with the use of our website

Data Controller Contact Details:

Data Protection Lead:	Mr John Read (Bursar)
Email address:	j.read@pgs.org.uk
Contact number:	023 9236 4250
Contact address:	The Portsmouth Grammar School, High Street, Portsmouth, Hampshire, PO1 2LN

We have appointed a Data Protection Officer (**DPO**) who can be contacted at:

Data Protection Officer:	GDPR Sentry Limited
Email address:	support@gdprsentry.com
Contact number:	0113 804 2035
Contact address:	Unit 434 Birch Park, Thorp Arch Trading Estate, Wetherby, LS23 7FG

2. Information we collect

Personal Information

We do not intentionally collect special category (sensitive) personal data through our website. However, the School does collect special category data in the normal course of its educational and safeguarding duties (e.g., health information, SEND details, ethnicity, safeguarding records). This type of data is not collected via the website, unless you choose to submit it through an online form.

Where special category data is processed, we rely on the conditions in Article 9 of the UK GDPR, such as substantial public interest and safeguarding obligations.

By visiting or using the Site, we may collect the following categories of personal information ("personal information") you provide to us: name; title; email address; postal address; phone number (including your mobile phone number); children's names; job role; marketing responses; admissions follow-ups; and other information you may provide about yourself to the Site or to which you provide us with access via third-party platforms.

We do not proactively collect personal information considered as sensitive personal information such as health-related or financial information on the Site. However, our Site may include text boxes which are designed for you to provide your choice of certain information about your marketing preferences.

If you are an existing Portsmouth Grammar School family, we will combine this information with information we collect on the Site and use it for the purposes described below.

Device Information.

When you visit the Site or open communications (such as emails) , some information is automatically collected from devices (e.g., mobile, computer, laptop, tablet) used to visit or use the Site including, but not limited to, operating system, access times, browser information (e.g., type, language, and history), settings, and other data about your device that we use to provide the services or as otherwise described in this Notice (" device information"). We also collect information about your usage and activity on the Site using certain technologies, such as cookies, web beacons and other technologies (see V Cookies and Other Tracking Technologies for more details).to prevent bullying, detect it when it occurs, and respond to it appropriately on a case-by-case basis.

Location Information.

If you use our Site, we may receive your generic location (such as city or neighbourhood). We may use and store this information to provide and improve features of the Site, for example, to tailor the Site on a needs-based manner to better facilitate your requests and to provide you more relevant content.

3. How we use your Information

Our Lawful Bases for Using Your Information

Under the UK GDPR, we must identify the lawful bases we rely on when processing personal data. The Portsmouth Grammar School relies on the following lawful bases:

- Public Task: Much of our processing is necessary for us to perform our public task as an educational provider.
- Legitimate Interests: For example, to improve our website, maintain security, and understand how it is used.
- Consent: For optional activities such as marketing communications, non-essential cookies, and analytics.
- Contract: When processing is needed to provide services, you have requested (e.g. admissions enquiries, event bookings).
- Legal Obligation: Where we must comply with UK law, including safeguarding duties.

Where we rely on consent, you may withdraw it at any time.

We may use your information for the following purposes (" Purposes"), to: provide you with the services, and functionality offered through the Site and fulfil your requests, including, but not limited to; communicate with you about your enquiry or use of the Site, services, or functionality; respond to, or follow up on, your comments and questions, and otherwise provide customer service; communicate with you about special events and other marketing communications; operate and improve the Site, services, and functionality; process and provide events to attend, if applicable; tailor your experience on the Site, including search results and displaying relevant promotions; link or combine with other information we get from third parties to help understand your needs and provide you with better service; perform statistical analysis; protect, investigate, and deter against fraudulent, unauthorised, or illegal activity; comply with our policies ,procedures and legal obligations; and as otherwise consented to by you and as required or permitted by applicable law.

If you do not provide us with certain of your information, we may not be able to fulfil the requested Purpose of collection, such as to respond to your queries or provide the Site to you.

Combined Information

We may combine your personal information with device information and location information (with your consent, where required) to serve you specifically, such as to deliver a service to you according to your preferences or restrictions, or for advertising or advertising targeting purposes. When we combine personal information, device information and location information in this way, we treat it as and apply all of the safeguards in this Notice applicable to, your information representing the School or wearing School uniform

Electronic Communications.

Consistent with the above Purposes, we may communicate with you via electronic messages, including email, text message, or mobile push notification to, for example: send you information relating to our school, including event reservation and waitlist confirmations and updates, receipts, technical notices, updates, security alerts, and support and administrative messages; and/or, subject to the Your Choices section, below, and/or applicable law, communicate with you about events, offers, promotions, upcoming events, and other news about services offered by Portsmouth Grammar School.

Automated Decision-Making and Profiling

We do not make automated decisions that have legal or significant effects on you. However, some of our analytics and advertising cookies (e.g., Google Ads or Facebook Pixel) involve profiling to understand how visitors use our website and to provide relevant content. This only occurs where

you have given consent to non-essential cookies.

Retention.

We will retain your information for the period necessary to fulfil the Purposes outlined in this Notice and as otherwise needed to comply with applicable law and internal company policies.

As a guide:

- Enquiry form submissions: current academic year plus one year
- Marketing preferences: until you withdraw consent
- Website analytics data: 26 months (Google Analytics default)

Full details are available in our School-wide Retention Policy, available on request.

4. How we share your information

We do not share your information with third parties other than as described above and as follows:

We may disclose your information to regulatory authorities, courts, government agencies and other third parties where we believe that doing so would be in accordance with or permitted or required by any applicable law, regulation or legal process, to defend the interests, rights, and/or property of Portsmouth Grammar School or others, or to respond to emergencies.

We may otherwise share your information as directed by you or subject to your consent.

Information you share socially

The Site may allow you to connect and share your actions, comments, content, and information publicly or with friends. The Site may also allow you to connect with us on, share on, and use third-party platforms, including those on which Portsmouth Grammar School has a presence. Please be mindful of your personal privacy needs and the privacy needs of others as you choose whom to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others. Portsmouth Grammar School also does not control the privacy practices of third-party platforms. Please contact those sites and services directly to learn about their privacy practices.

5. Security of your Information

Portsmouth Grammar School takes commercially reasonable technical, administrative, and physical security measures designed to protect your information from loss, misuse, unauthorised access, disclosure, alteration, and destruction.
If credit or debit card account information is being transmitted to the Site or through the Site, it will be protected by cryptographic protocols. To be clear, Portsmouth Grammar School's website does not itself store your credit or debit card account information, and we do not have direct control over or responsibility for your credit or debit card account information. We use third party payment processors that are the controllers of your credit card information. Our contracts with third parties that receive your credit or debit card account information require them to keep it secure and confidential.

Nonetheless, we cannot guarantee that transmissions of your credit or debit card account information or your other information will always be secure or that unauthorised third parties will never be able to defeat the

security measures taken by Portsmouth Grammar School or our third-party service providers. Except to the extent that liability cannot be excluded or limited due to applicable law, we assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorised third-party access, or other causes beyond our control. You play an important role in keeping your information secure. You should not share your username, password, or other security information for your Portsmouth Grammar School account with anyone. If we receive instructions using your username and password, we will consider that you have authorised the instructions.

How we secure your data.

Information system and data security is imperative to us to ensure that we are keeping our clients and subscribers happy.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and secure against the ever-changing threat landscape.

When you trust us with your data, we will always keep your information secure to maintain your confidentiality. By utilising strong encryption when your information is stored or in transit, we minimise the risk of unauthorised access or disclosure; when entering information on the Site, you can check this by right clicking on the padlock icon in the address bar.

Storage of information.

Some of our third-party service providers may transfer personal data outside the UK. Where this occurs, we ensure that appropriate safeguards are in place, such as:

- an adequacy decision by the UK Government;
- the UK International Data Transfer Agreement (IDTA); or
- the UK Addendum to the EU Standard Contractual Clauses.

These measures ensure that your data is protected to UK GDPR standards.

The Portsmouth Grammar School hosting operations are based in the UK and we store most of our data within the European Union (EU). Some organisations which provide services to us may transfer data outside the European Economic Area, but we'll only allow this if your data is adequately protected. Some of our social media channels are provided by US companies and whilst it is our Notice that we prefer data hosting and processing to remain on EU-based solutions, it may be that using their products results in data transfer to the USA. However, we only allow this when we are certain it will be adequately protected. (e.g. US Privacy Shield or Standard EU contractual clauses).

6. Cookies and Other Technologies

Cookies are small text files that can be used by websites to make a user's experience more efficient.

We collect information about your usage and activity on the Site using certain technologies, such as cookies, web beacons, and other technologies. We and our third-party service providers, and/or partners may also place web beacons for measuring sales and marketing campaigns.

The use of these technologies by such third parties is subject to their own privacy policies and is not covered by this Notice, except as required by law.

The law states that we can store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies, we need your permission. Your consent applies

to the Sites.

You can change or withdraw your cookie consent at any time by selecting “Change your consent” on our cookie banner or through your browser settings.

Non-essential cookies (such as analytics or marketing cookies) will only be set if you choose to enable them. Necessary cookies cannot be disabled.

7. Your Choices

Email

If you do not want to receive marketing and promotional emails from Portsmouth Grammar School, you may click on the "unsubscribe" link in the email to unsubscribe and opt-out of marketing email communications. Alternatively, to the extent that applicable law requires your prior opt-in consent to receive marketing and promotional emails, you can choose not to opt-in. Please note that even if you opt-out of receiving marketing communications from the Site, we may need to send you service-related communications, such as confirmations of any future reservations to our events.

8. Your Rights

You have the right to request:

8.1 Access to the personal data we hold about you, free of charge in most cases.

8.2 The correction of your personal data when incorrect, out of date or incomplete.

8.3 That we stop using personal data for direct marketing (either through specific channels, or all channels).

8.4 That we stop any consent-based processing of your personal data after you withdraw that consent.

8.5 You can Contact Us to request to exercise these rights at any time.

If we choose not to action your request, we will explain to you the reasons for our refusal.

Your right to withdraw consent.

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest.

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

Keeping your information.

We will only use and store your information for as long as it is required for the purposes it was collected for. How long it will be stored for depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

9. Links to Other Websites

The Site may contain links to other websites or services that are not owned or controlled by **Portsmouth Grammar School**. This Notice only applies to information collected by the Site. We have no control over these third-party websites, and your use of third-party websites and features are subject to privacy policies posted on those websites. We are not responsible or liable for the privacy or business practices of any third-party websites linked to the Site. Your use of third parties' websites linked to the Site is at your own risk, so we encourage you to read the privacy policies of any linked third-party websites when you leave one of the Site.

10. Changes to this Notice

Except to the extent limited by applicable law, we reserve the right to update this Notice to reflect changes to our information practices by prominently posting notice of the update on the Site, and as required, obtaining your consent. Any updates will become effective immediately after posting the updates to this Notice and apply to all information collected about you, or where required, upon your consent. You agree that you will review this Notice periodically. If we make any changes to this Notice, we will change the "Last Updated" date at the top. You are free to decide whether or not to accept a modified version of this Notice, but accepting this Notice, as modified, is required for you to continue using the Site. If you do not agree to the terms of this Notice or any modified version of this Notice, your sole recourse is to terminate your use of the Site.
If we make any changes to this Notice that materially impacts previously collected information about you, we will obtain your prior express consent.

11. Contact us

If you have any questions about this Notice or information we have collected about you, please Contact Us. We will aim to respond to all queries within 30 days.

What to do if you're not happy.

In the first instance, please talk to us directly so we can resolve any problem or query. You also have the right to contact the Information Commissions Office (ICO), the UK supervisory authority for data protection issues, if you have any questions about Data Protection. You can contact them using their help line 0303 123 113 or at www.ico.org.uk.

Your current state:

Allow these cookies (Necessary)

Change your consent | Withdraw your consent

Necessary

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Cookie Name	Description	Duration
intSchoolsCookieManager	Contains the necessary data for GDPR & DPA cookie bar	1 year

Cookie Name	Description	Duration
ASP.NET_SessionId	Is used to identify the users session on the server	Session
culture	Is used to store the default website language code	Session
returnUser	Is used to hide the alert/notification after 1st visit	1 day

Statistics

Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.

Cookie Name	Description	Duration
__Secure-3PAPISID	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting. For more information, see the Google Privacy Notice.	2 years
__Secure-3PSID	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting. For more information, see the Google Privacy Notice.	2 years
__Secure-APISID	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting. For more information, see the Google Privacy Notice.	8 months
__Secure-HSID	To secure digitally signed and encrypted data from the unique Google ID and store the most recent login time that Google uses to identify visitors, prevent fraudulent use of login data and protect visitor data from unauthorized parties. This can also be used for targeting purposes to display relevant and personalized advertising content. For more information, see the Google Privacy Notice.	8 months
__Secure-SSID	Stores information about how the visitor uses the website and about the advertisements that may have been seen before the visitor visits the website. Also used to customize ads on Google domains. For more information, see the Google Privacy Notice.	8 months
_gali	Is used by Google Analytics to determine which links on a page that are being clicked. For more information, see the Google Privacy Notice.	Until browser closes
_ga	This cookie is a Google Analytics persistent cookie which is used to distinguish unique users. For more information, see the Google Privacy Notice.	2 years
_gat_UA_USER_ID	This cookie is used to throttle request rate. These are third party cookies that are placed on your device to allow us to use the Google Analytics service. These cookies are used to collect information about how visitors use our website. We use this information to compile reports and to help us improve the website. For more information, see the Google Privacy Notice.	Until browser closes
_gat	This cookie is used to throttle request rate. These are third party cookies that are placed on your device to allow us to use the Google Analytics service. These cookies are used to collect information about how visitors use our website. We use this information to compile reports and to help us improve the website. For more information, see the Google Privacy Notice.	Until browser closes

Cookie Name	Description	Duration
_gid	This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected including the number visitors, the source where they have come from, and the pages visited in an anonymous form. For more information, see the Google Privacy Notice.	1 day

Marketing

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.

Cookie Name	Description	Duration
CONSENT	Stores visitors' preferences and personalizes ads. For more information, see the Google Privacy Notice.	Persistent
NID	Stores visitors preferences and personalizes ads on Google websites based on recent searches and interactions. For more information, see the Google Privacy Notice.	6 months
OTZ	Links activities of website visitors to other devices that are previously logged in via the Google account. In this way, advertisements are tailored to different devices. For more information, see the Google Privacy Notice.	1 month
SIDCC	Security cookie to confirm visitor authenticity, prevent fraudulent use of login data and protect visitor data from unauthorized access. For more information, see the Google Privacy Notice.	3 months
ANID	Lists ads on Google sites based on recent searches. For more information, see the Google Privacy Notice.	Persistent
SAPISID	Google collects visitor information for videos hosted by YouTube. For more information, see the Google Privacy Notice.	Persistent
SSID	Google collects visitor information for videos hosted by YouTube on maps integrated with Google Maps. For more information, see the Google Privacy Notice.	Persistent
HSID	Security cookie to confirm visitor authenticity, prevent fraudulent use of login data and protect user data from unauthorized access. For more information, see the Google Privacy Notice.	2 years
APISID	Personalizes Google ads on websites based on recent searches and interactions. For more information, see the Google Privacy Notice.	2 years
SID	Security cookie to confirm visitor authenticity, prevent fraudulent use of login data and protect visitor data from unauthorized access. For more information, see the Google Privacy Notice.	2 years
Collect	Cookies used for analytics help collect data that allows services to understand how users interact with a particular service. For more information, see the Google Privacy Notice.	Session
_hjSession_SITE_ID	Holds current session data / Ensures subsequent requests in the session window are attributed to the same session. For more information, see the Hotjar Cookies.	Until browser closes
_hjSessionUser_SITE_ID	Set when a user first lands on a page / Persists the Hotjar User ID which is unique to that site / Ensures data from subsequent visits to the same site are attributed to the same user ID. For	Until browser closes

Cookie Name	Description	Duration
	more information, see the Hotjar Cookies.	
_hjIncludedInPageviewSample	Set to determine if a user is included in the data sampling defined by your site's pageview limit. For more information, see the Hotjar Cookies.	Until browser closes
_hjFirstSeen	Identifies a new user's first session / Used by Recording filters to identify new user sessions. For more information, see the Hotjar Cookies.	Until browser closes
_hjAbsoluteSessionInProgress	Used to detect the first pageview session of a user. For more information, see the Hotjar Cookies.	Until browser closes
_fbp	Used to store and track visits across websites. For more information, see the Meta (Facebook) Cookies.	3 months

Allocation of Tasks & Version Control

Allocation of Tasks

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice	Bursar	As required, and at least annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Director of Information Services	As required, and at least termly
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR	Data Manager	As required, and at least termly
Receiving / reviewing input from interested groups (such as pupils, staff, Parents) to consider improvements to the School's processes under the policy	School Business Meeting	As required, and at least annually
Formal annual review	SMT	Annually

Version Control

Date Approved	29th June 2026 (SMT)
Date Reviewed	22nd June 2026 (School Business Meeting)
Next Review Date	Summer Term 2027
Policy author (SMT)	Bursar / Head of ICT Services
Status	Internal Staff
Report	ICT and Data Report

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