

## PRIVACY NOTICE

(Please note that the Parents Booking Privacy Notice is different from the Netmedia Privacy Policy, and can be found [here](#).)

### 1. What is this Notice About & Why Should You Read It?

We are committed to safeguarding the privacy of persons for whom we process personal data. In this privacy notice we explain how we will treat personal data processed by us, in accordance with data protection legislation.

### 2. What Types of Personal Data Do We Process and What are the Purposes of the Processing?

We process the following types and categories of personal data:

- Information relating to any purchases that you make or are contemplating making in relation to our goods or services, such as name, address, telephone number, age, email address, and bank details, and/or any other personal data which you voluntarily provide us with.
- Information relating to your employment with us, including name, address, email address, contact numbers, next-of-kin details, employment records, nationality, passport details, visa details, driving licence details and bank details.
- Personal data obtained through the usage of Cookies on our website – for more information, please view our Cookie Notice.
- Personal data enabling us to administer our website and ensure that our website is presented in the most effective manner for you, such as IP address, geographical location, browser types and version, operating system, referral source, length of visit, page views and website navigation paths.

From time to time we need to process special category data about people. We will only process special category personal data when allowed to do so by law, including where you have given us consent to do so, where it is necessary in order to enable us to carry out our obligations and specific rights in the field of employment, social security and social protection law, in order to protect a person's vital interests or if the data has already manifestly been made public by you. We may also process this type of data to establish, exercise or defend a legal claim. There are certain other exceptions which exist in law, and we reserve the right to rely on these exceptions, if and when required, but do not envisage such processing of special category personal data taking place within our organisation.

We will only process personal data which is adequate, relevant and limited to what is necessary for the processing purposes.

### 3. Where Do We Obtain Your Personal Data From?

### 3.1 Data Which We Collect From You Directly

The majority of the personal data which we process is obtained from you directly.

### 3.2 Data Which We May Obtain From Others

We do not routinely receive or process personal data about you from any other organisation. If we do process such personal data, we shall do so in accordance with the law.

Please note that if you are disclosing personal data regarding another person to us, you must first obtain that person's consent for both the disclosure and the processing by us of that personal data, unless another lawful basis exists for such a disclosure, such as a legal obligation. You are responsible for ensuring that you are authorised to disclose any such data to us.

## 4. What Lawful Bases Do We Have For Processing Your Personal Data?

We process your personal data on a number of lawful bases, namely:

- The performance of contract, or to enter into pre-contractual negotiations;
- In order for us to comply with a legal obligation imposed upon us;
- In order for us to protect your vital interests or those of another person;
- In our legitimate interests; and/or
- With your consent. Where the lawful basis for our processing your personal data is consent, you have the right to withdraw your consent at any time.

## 5. What Rights Do You Have?

You have certain rights under data protection legislation, which you can generally exercise in respect of the data which we process about you by contacting us.

Your rights are summarised below:

- **Right of access** – you can request a copy of the information that we hold about you
- **Right to rectification** – you can ask us to correct any personal data which we hold about you if you think that this is inaccurate or incomplete. Please note that you are responsible for letting us know if the personal data which we hold about needs to be corrected or updated.
- **Right to be forgotten** – in certain circumstances you can ask us to delete the personal data which we hold about you

- **Right to restriction of processing** – in certain circumstances you have a right to restrict us processing your personal data
- **Right of data portability** – you can ask us to transfer the personal data that we hold about you to other organisations, in certain circumstances
- **Right to object** – you have the right to object to us processing your personal data in certain circumstances
- **Right to object to us making a decision about you based solely on automated processing**, including profiling in certain circumstances

## 6. Who Do We Share Your Personal Data With and Why?

We may disclose your personal data to any of our employees, officers, insurers, professional advisors, agents, suppliers or subcontractors insofar as reasonably necessary, and in accordance with data protection legislation.

We may also disclose your personal data:

- with your consent;
- to the extent that we are required to do so by law;
- to protect the rights, property and safety of us, our customers, users of our websites and other persons;
- in connection with any ongoing or prospective legal proceedings;
- to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling;
- to another organisation if we enter into a joint venture or merge with another organisations;
- to any member of our group, which means those companies which are a subsidiary of our holding company, as defined by s.1159 of the Companies Act 2006.

If we wish or need to share your special category personal data with another organisation, we will only do so if we have either obtained your consent or we are required or allowed to do so by law.

## 7. Transferring Your Data Outside of the European Economic Area/The UK

Where we need to transfer and/or share personal data to countries and/or organisations outside of the European Economic Area, we only do so in accordance with the General Data Protection Regulation ('GDPR').

In the event of a no-deal Brexit, we will only transfer and/or share personal data to countries and/or organisations outside of the United Kingdom where authorised to do so by law.

## 8. How Long Do We Process Your Personal Data For?

We will only process your personal data for the purpose or purposes stated, and this data shall not be kept for longer than is necessary for such purpose or purposes.

Unless we advise you otherwise, we will retain your personal data in accordance with legal requirements and/or best practice.

## **9. Security of Personal Data**

We will take reasonable technical and organisational measures and precautions so as to prevent the loss, misuse or alteration of your personal data.

We will store all of the personal data which we process in paper records, on our servers and/or in the Cloud.

Please note that the transmission of any type of information over the internet is inherently insecure. We therefore cannot guarantee the security of data sent over the internet.

## **10. Are We Allowed to Change this Notice?**

From time to time we need to make amendments to our Privacy Notice, which we will do by publishing a new version on our website. Please check this page occasionally so as to ensure that you are happy with any changes which we have made to the Notice.

## **11. What Should You Do If You Have Any Complaints or Want to Find out More?**

We continuously seek to ensure that we adhere to the general principles of data protection legislation, including that your personal data will be processed lawfully, fairly, in a transparent manner, subject to the purpose limitation, is minimised, is accurate, is not stored for longer than is necessary for the purposes and is processed with integrity and confidentially, as appropriate.

If you wish to exercise any of your rights as a data subject, wish to receive any more information or wish to make a complaint, please contact our data protection officer.

Our Data Protection Officer is William Mackenzie and he can be contacted using the details below.

We will always endeavour to resolve any queries which you may have, but please note that you also have the right to complain directly to the Information Commissioner's Office and seek other legal remedies.

## **12. Applicability**

Please note that this privacy notice does not apply to our Parents' Evening Booking System, which is provided by Netmedia Ltd, which has its own specific Privacy Notice.

## **13. How Can You Contact Us?**

We are Netmedia Ltd, registered in Scotland under registration number SC483579. Our registered address is at Old Drynie House, Kilmuir, North Kessock, Inverness IV1 3XG. Our principal place of business is at our registered address. Our company website address is <http://netmedia.co.uk> and our parents' evening website addresses is <https://parents-booking.com>.

You can contact us in any of the following ways:

- by post, using the address given above
- by calling us on 01436 731000
- by emailing us at [dataprotection@netmedia.co.uk](mailto:dataprotection@netmedia.co.uk)

The information below this line should not be published on the website.

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<b>Document Details</b>	
Date of Approval	1 March 2022
Approved by	Board of Directors
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## Cookie Notice

### 1. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website.

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may either be 'persistent cookies' or 'session cookies'. A persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date. A session cookie, on the other hand, will expire at the end of the user session when the web browser is closed.

We use persistent and session cookies on our website.

Cookies can either be First Party Cookies, when they are placed on the website by the owners of the website or Third-Party Cookies, when they are placed on the website by other third parties who help them with their website.

You can delete cookies already stored on your computer.

Most browsers allow you to refuse to accept cookies. Blocking all cookies will have a negative impact on the usability of many websites. If you block cookies, you may not be able to use all of the features on our website.

You can find out how to manage cookies on popular browsers, by clicking on the links below:

- Google Chrome  
<https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>
- Microsoft Edge  
<https://support.microsoft.com/en-gb/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>
- Mozilla Firefox  
<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Microsoft Internet Explorer  
<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>
- Opera  
<https://help.opera.com/en/latest/>
- Apple Safari  
<https://support.apple.com/en-gb/safari>

To find information relating to other browsers, visit the browser developer's website.

The cookies which our website uses are:

<b>Cookie Name</b>	<b>Expiration Date/Average life span</b>	<b>Description</b>	<b>Type of Cookie</b>
1P_JAR	>5000 years	Carries out information about end user website and advertising user may have seen before visiting website. <b>Targeting/Advertising</b>	Most common as Persistent
ANID	>300 years	Not much information known about this cookie. <b>Unknown</b>	Most common as Persistent
APISID	>1400 years	DoubleClick (owned by Google) cookie, generally sent through advertising partners to build profile of website visitor's interests in order to show relevant ads. Works by uniquely identifying browser and device. <b>Targeting/Advertising</b>	Most common as Persistent
CONSENT	>4000 years	Carries out information about end user uses website and advertising user may have seen before visiting website. <b>Targeting/Advertising</b>	Most common as persistent
HSID	>1400 years	Set by DoubleClick (owned by Google) to build a profile of the website visitor's interests and show relevant ads on other sites. <b>Targeting/Advertising</b>	Most common as persistent
NID	>300 years	Set by DoubleClick (owned by Google) to build a profile of the website visitor's interests and show	Most common as persistent

		relevant ads on other sites. <b>Targeting/Advertising</b>	
OTZ	>30 years	Not much information known about this cookie. <b>Unknown</b>	Most common as persistent
SAPISID	>1400 years	Set by DoubleClick (owned by Google) to build a profile of the website visitor's interests and show relevant ads on other sites. <b>Targeting/Advertising</b>	Most common as persistent
SEARCH_SAMESITE	>150 days	Rare cookie. Not much information known about this cookie. <b>Unknown</b>	Most common as persistent
SID	>900 days	Very common cookie name but where it is found as a session cookie it is likely to be used for session state management. <b>Strictly Necessary</b>	Most common as persistent, however also session cookie
SIDCC	>150 years	Carries out information about end user websites and advertising user may have seen before visiting website	Most common as persistent
SSID	>1400 years	Carries out information about end user uses website and advertising user may have seen before visiting website <b>Targeting/Advertising</b>	Most common as persistent
_zicmid	>700 years	Live chat widget sets the cookies to store the Zopim Live Chat ID used to identify a device across visits. <b>Functionality</b>	Most common as persistent
__Secure-3PAPISID	>7900 years	Rare cookie. Not much information known about this cookie. <b>Unknown</b>	Most common as persistent

__Secure-3PSID	>7900 years	Rare cookie. Not much information known about this cookie. <b>Unknown</b>	Most common as persistent
__Secure-APISID	>7900 years	Rare cookie. Not much information known about this cookie. <b>Unknown</b>	Most common as persistent
__Secure-HSID	>7900 years	Rare cookie. Not much information known about this cookie. <b>Unknown</b>	Most common as persistent
__Secure-SSID	>7900 years	Rare cookie. Not much information known about this cookie. <b>Unknown</b>	Most common as persistent

We also use Google Analytics on our website. To opt out of being tracked by Google Analytics across all websites you can visit <http://tools.google.com/dlpage/gaoptout>.

## 2. About Us

We are Netmedia Ltd registered in Scotland under registration number SC483579. Our registered address is at Old Drynie House, Kilmuir, North Kessock, Highland, IV1 3XG. Our principal place of business is at our registered address. Our website address is Netmedia.co.uk.

You can contact us in any of the following ways:

- by post, using our address (see above)
- by calling us on 01463 731 000
- By emailing us at [dataprotection@netmedia.co.uk](mailto:dataprotection@netmedia.co.uk)

## 3. Further Information

If you require any further information, please contact us using the details above.