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**Privacy Statement – Website and Cookies Data – FI12(I)**

**Three Counties Academy Trust (TCAT)**

**Effective Date:** Academic year 2024-2025 **Last Reviewed:** February 6th, 2025

**1. Introduction**

Three Counties Academy Trust, commonly referred to as **TCAT**, is committed to protecting the privacy and security of personal data. This privacy statement explains how we collect, use, and share **website and cookies data** across all TCAT-operated websites in compliance with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, and the **Privacy and Electronic Communications Regulations (PECR)**.

TCAT is the **Data Controller** for the personal data collected through its websites unless otherwise stated. Each school within TCAT follows this privacy statement to ensure consistency in data protection practices.

**2. What Data We Collect**

We collect, store, and process the following categories of website and cookies data:

* **Personal Information (if provided)** – Name, email address, phone number, and any details submitted via contact forms
* **Technical Information** – IP address, browser type and version, device type, operating system, and referral source
* **Usage Data** – Pages visited, time spent on the website, click interactions, and navigation paths
* **Cookies and Tracking Technologies** – Information stored in cookies to personalise content, improve website functionality
* **Communication Preferences** – Subscriptions to newsletters, alerts, or other communications
* **Security and Fraud Prevention Data** – Suspicious activity

**3. Why We Collect and Use Website and Cookie Data**

We process website and cookies data under the following lawful bases as defined under UK GDPR:

* **Legitimate Interests (Article 6(1)(f))** – To improve website functionality, enhance security, and monitor user engagement, balanced against individual rights
* **Consent (Article 6(1)(a))** – For cookies and analytics tracking that are not strictly necessary for website operation
* **Legal Obligation (Article 6(1)(c))** – To comply with security and regulatory requirements

**4. How We Use Website and Cookie Data**

We use website and cookies data for the following purposes:

* To provide a secure and functional website experience
* To analyse website traffic and improve website content
* To track and manage cookie preferences in compliance with **PECR**
* To personalise user experiences based on previous visits and interactions
* To facilitate communication via online contact forms
* To prevent security threats and detect fraudulent activity

**5. Cookies Policy**

Cookies are small text files stored on a user’s device when they visit a website. TCAT uses the following types of cookies:

* **Strictly Necessary Cookies** – Essential for website operation (e.g., login authentication, security)
* **Performance and Analytics Cookies** – Used to track user interactions and improve website functionality
* **Functional Cookies** – Enhance user experience by remembering preferences
* **Targeting and Advertising Cookies** – Used for marketing and personalised content

Upon visiting TCAT websites, users are presented with a **cookie consent banner** allowing them to:

* View the cookie policy

**6. How We Store and Protect Website and Cookie Data**

We take the security of website and cookies data seriously and use the following measures to protect it:

* **Encryption** – Secure encryption for stored and transmitted data
* **Access Controls** – Restricted access to administrative and analytics tools
* **Firewall and Security Monitoring** – Continuous monitoring for potential threats

Cookies are retained for different periods depending on their type:

* **Session Cookies** – Deleted when the browser is closed
* **Persistent Cookies** – Stored for a period defined by the website (typically up to 12 months) unless manually deleted by the user

**7. Who We Share Website and Cookie Data With**

We only share website and cookies data when necessary and lawful, including with:

* **Website Hosting and IT Providers** – For maintaining and managing TCAT websites
* **Analytics Providers** – Such as Google Analytics, for website usage tracking
* **Law Enforcement Agencies** – If required for legal compliance or cybersecurity concerns
* **Marketing and Communications Platforms** – If users have opted in to receive updates

All third parties we share data with must comply with strict data protection agreements.

**8. International Data Transfers**

Some analytics and tracking tools may process data outside the UK. If this occurs, we ensure adequate safeguards, such as **UK adequacy decisions** or **Standard Contractual Clauses (SCCs)**.

**9. Website Users' Rights**

Under UK GDPR, website users have the following rights regarding their personal data:

* **Right to Be Informed** – About how we use their data
* **Right of Access** – To request a copy of their personal data
* **Right to Rectification** – To correct inaccurate or incomplete data
* **Right to Erasure ("Right to Be Forgotten")** – In certain circumstances, to request data deletion
* **Right to Restrict Processing** – To limit how data is used
* **Right to Data Portability** – To request data in a transferable format (where applicable)
* **Right to Object** – To processing based on legitimate interests
* **Right to Withdraw Consent** – For cookie tracking and marketing communications

To exercise any of these rights, please contact the Data Protection Officer (DPO) (details below).

**10. Contact Details**

For any questions about this privacy statement or to exercise your rights, please contact:

**S Smith Information Governance Officer and Data Protection Officer**on behalf of Three Counties Academy Trust  
Herefordshire Council, Plough Lane, Hereford, HR4 0LE  
Email: samsmith@herefordshire.gov.uk  
Tel: 01432 260282

If you have concerns about how your data is handled, you can also contact the **Information Commissioner’s Office (ICO):**

**ICO Website:** [**www.ico.org.uk**](https://www.ico.org.uk) **ICO Helpline:** 0303 123 1113

**11. Changes to This Privacy Statement**

We may update this privacy statement from time to time. Any significant changes will be communicated via our website and school communications.