

Website Privacy Notice



COOMBE HOUSE
SCHOOL

Privacy Notice owner:	Data Protection Officer	Adoption Date:	February 2023
Approved by company:	Managing Director		
Review cycle	Annual		
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Changes made:	The following changes have been made: -Amended Governance and GDPR Lead to Data Protection Officer -Replaced Senior Responsible Individual (SRI) with Data Protection Officer (DPO)		
Next review due by:	July 2026		



Dorset
Centre of
Excellence

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1. Identity and contact details of the data controller

1.1. The data controller responsible in accordance with the purposes of the UK General Data Protection Regulation (UK GDPR) and other data protection regulations is:

Dorset Centre of Excellence Limited

Donhead St Mary

Shaftesbury

SP7 9LP

Telephone: 01747 449 844

Email: reception@coombehouse.org.uk

www.dorsetcentreofexcellence.org.uk

www.coombehouseschool.org.uk

The Company is registered with the Information Commissioner's Office (ICO), as legally required. The reference number is: ZB244508.

As the controller of the personal data processed, the Company is responsible for deciding how information is collected, used and stored.

2. Contact details of the Data Protection Officer (DPO)

2.1. The contact details of the Data Protection Officer (DPO) are as follows:

Dorset Centre of Excellence Limited

Donhead St Mary

Shaftesbury

SP7 9LP

Email: dpo@coombehouse.org.uk

The Data Protection Officer is the first point of contact for individuals whose data the company processes, and for the ICO.

The Quality Assurance Lead is responsible for overseeing the implementation of this notice, monitoring compliance with data protection law, and developing related procedures and guidelines where applicable.

3. General information on data processing

3.1. Scope of processing personal data

3.1.1. In general, the Company processes the personal data of users to the extent necessary to provide a functioning website with content and services. The regular processing of personal data only takes place with the consent of the user. Exceptions include cases where prior consent cannot be technically obtained and where the processing of the data is permitted by law.

3.2. Legal basis for data processing

- 3.2.1. Where consent is appropriate for processing personal data, Art. 6 (1) (a) UK GDPR serves as the legal basis to obtain the consent of the data subject for the processing of their data.
- 3.2.2. As for the processing of personal data required for the performance of a contract of which the data subject is party, Art. 6 (1) (b) UK GDPR serves as the legal basis. This also applies to processing operations required to carry out pre-contractual activities.
- 3.2.3. When it is necessary to process personal data in order to fulfil a legal obligation to which our company is subject, Art. 6 (1) (c) UK GDPR serves as the legal basis.
- 3.2.4. If vital interests of the data subject or another natural person require the processing of personal data, Art. 6 (1) (d) UK GDPR serves as the legal basis.
- 3.2.5. When it is necessary to process personal data for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, Art. 6 (1) (e) UK GDPR serves as the legal basis.
- 3.2.6. If the processing of data is necessary to safeguard the legitimate interests of our company or that of a third party, and the fundamental rights and freedoms of the data subject do not outweigh the interest of the former, Art. 6 (1) (f) UK GDPR will serve as the legal basis for the processing of data.

3.3. Data removal and storage duration

- 3.3.1. The personal data of the data subject will be erased or restricted as soon as the purpose of its storage has been accomplished. Additional storage may occur if this is provided for by the national legislator to which the data controller is subject. Restriction or erasure of the data also takes place when the storage period stipulated by the aforementioned standards expires, unless there is a need to prolong the storage of the data for the purpose of concluding or fulfilling the respective contract.

4. Rights of the data subject

- 4.1. When an individual's personal data is processed, they are a data subject within the meaning of the UK GDPR and have the following rights:
 - 4.1.1. Right to information.
 - 4.1.1.1. The individual may request the data controller to confirm whether their personal data is processed by them. If such processing occurs, the individual can request the following information from the data controller:

- The purpose for which the personal data is processed.
- The categories of personal data being processed.
- The recipients or categories of recipients to whom the personal data have been or will be disclosed.
- The planned duration of the storage of the personal data or, if specific information is not available, criteria for determining the duration of storage.
- The existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning you or to object to such processing.
- The existence of the right to lodge a complaint with a supervisory authority.
- Where personal data is not collected from the individual, any available information as to their source.
- The existence of automated decision-making including profiling under Art. 22 (1) and Art. 22 (4) UK GDPR and, in certain cases, meaningful information about the data processing system involved, and the scope and intended result of such processing on the data subject.
- The individual has the right to request information on whether their personal data will be transmitted to a third country or an international organization. In this context, the individual can then request for the appropriate guarantees in accordance with Art. 46 UK GDPR in connection with the transfer.

4.1.2. Right to rectification.

- 4.1.2.1. The individual has a right to rectification and/or modification of the data, if their processed personal data is incorrect or incomplete. The data controller must correct the data without delay.

4.1.3. Right to the restriction of processing.

- 4.1.3.1. The individual may request the restriction of the processing of their personal data under the following conditions:
 - If the individual challenges the accuracy of their personal data for a period that enables the data controller to verify the accuracy of the personal data.
 - The processing is unlawful, and the individual opposes the erasure of the personal data and instead request the restriction of its use instead.

- The data controller or its representative no longer need the personal data for the purpose of processing, but the individual needs it to assert, exercise or defend legal claims; or
- The individual has objected to the processing pursuant to Art. 21 (1) UK GDPR and it is not yet certain whether the legitimate interests of the data controller override your interests.

4.1.4. Right to erasure.

4.1.4.1. If an individual requests the data controller to delete their personal data without undue delay, they are required to do so immediately if one of the following applies:

- Personal data concerning the individual is no longer necessary for the purposes for which they were collected or processed.
- The individual withdraws their consent on which the processing is based pursuant to Art. 6 (1) (a) and Art. 9 (2) (a) UK GDPR and where there is no other legal basis for processing the data.
- According to Art. 21 (1) UK GDPR if the individual objects to the processing of the data and there are no longer overriding legitimate grounds for processing, or you object pursuant to Art. 21 (2) UK GDPR.
- The personal data has been processed unlawfully.
- The personal data must be deleted to comply with a legal obligation in Union law or Member State law to which the data controller is subject.

4.1.4.2. The right to deletion does not exist if the processing is necessary:

- To exercise the right to freedom of speech and information.
- To fulfil a legal obligation required by the law of the United Kingdom to which the data controller is subject, or to perform a task of public interest or in the exercise of public authority delegated to the representative.
- For reasons of public interest in the field of public health pursuant to Art. 9 (2) (h) and Art. 9 (2) (i) and Art. 9 (3) UK GDPR.
- For archival purposes of public interest, scientific or historical research purposes or for statistical purposes pursuant to Art. 89 (1) UK GDPR, to the extent that the law referred to in subparagraph (a) is likely to render impossible or seriously affect the achievement of the objectives of that processing, or
- To enforce, exercise or defend legal claims.

4.1.5. Right to data portability.

4.1.5.1. An individual has the right to receive their personal data given to the data controller in a structured and machine-readable format. In addition, the individual has the right to transfer this data to another person without hindrance by the data controller who was initially given the data if:

- a) The processing is based on consent in accordance with Art. 6 (1) (a) UK GDPR or Art. 9 (2) (a) UK GDPR or performance of a contract in accordance with Art. 6 (1) (b) UK GDPR and
- b) The processing is done by automated means.

4.1.6. Right to object.

4.1.6.1. For reasons that arise from the individual's particular situation, they have, at any time, the right to object to the processing of their personal data pursuant to Art. 6 (1) (e) or 6 (1) (f) UK GDPR; this also applies to profiling based on these provisions.

4.1.6.2. As data controller the Company will no longer process the personal data concerning you unless the Company can demonstrate compelling legitimate grounds for processing that outweigh the individual's interests, rights and freedoms, or the processing is for the purpose of enforcing, exercising or defending legal claims.

4.1.6.3. If the personal data relating to the individual is processed for direct marketing purposes, they have the right to object at any time to the processing of their personal data in regard to such advertising; this also applies to profiling associated with direct marketing.

4.1.7. Right to withdraw consent.

4.1.7.1. An individual has the right to withdraw their consent at any time. The withdrawal of consent does not affect the legality of the processing carried out on the basis of the consent prior to consent being withdrawn.

4.1.8. Right to complain to a supervisory authority.

4.1.8.1. Without prejudice to any other administrative or judicial remedy, an individual shall have the right to complain, if they believe that the processing of the personal data concerning them violates the UK GDPR. If an individual is located in the United Kingdom, they shall have the right to complain to the ICO if they are unhappy with how the Company has used the data and/or believe that the processing of the personal data concerning them violates the applicable law. The ICO's address: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Helpline number: 0303 123 1113 ICO website: <https://www.ico.org.uk>.

4.1.8.2. If an individual has concerns about how the Company has handled their personal information, please contact the Data Protection Officer in the first instance so that they can try to resolve the issue. Please contact them by email at: dpo@coombehouse.org.uk.

4.1.8.3. The supervisory authority to which the complaint has been submitted shall inform the complainant of the status and results of the complaint, including the possibility of a judicial remedy pursuant to Art. 78 UK GDPR.

5. Use of cookies

5.1. Description and scope of data processing

5.1.1. Cookies are set when an individual visits the website. Cookies are files that are stored in the Internet browser or by the Internet browser on the user's computer system. This storage of information on the user's terminal device can be done using unique identifiers (UID), which allows us to identify or associate it with a natural person.

5.1.2. Cookies are used to make the website more user-friendly. Some elements of the website require the calling browser to be identified even after a page break.

The following data is stored and transmitted in the cookies:

- Log-in information

5.1.4 Cookies are also used on the website to analyse the browsing behaviour of the users. As a result, the following data will be transmitted:

- Frequency of page views
- Use of website functionalities

The user data collected in this manner is pseudonymised by technical measures. It is therefore not possible to assign the data to the user accessing the site. The data is not stored together with other personal data of the users.

5.2. Purpose of data processing

5.2.1. The purpose of using technical cookies is to simplify the use of websites for users. Some functions of the website cannot be offered without the use of cookies. These require that the browser is recognized even after a page change.

Cookies are needed for the following purpose: Website Functionality. The user data collected by technical cookies are not used to create user profiles. The analysis cookies are used for the purpose of improving the quality of the website and its content. Through the analysis cookies, it is learnt how the website is used and thus can constantly optimize the offer.

- 5.2.2. Google Analytics are used to allow the analysis of the traffic to the site and to review a number of statistics regarding visitors. Matomo Analytics is used to analyse the traffic to the site and to review a number of statistics regarding visitors.

5.3. Legal basis for data processing

- 5.3.1. The legal basis for the processing of personal data using non-technical cookies is Art. 6 (1) (a) UK GDPR.
- 5.3.2. The legal basis for the processing of personal data using technical cookies is Art. 6 (1) (f) UK GDPR, legitimate interests.

5.4. Duration of storage and possibility of objection and removal

- 5.4.1. Cookies are stored on the user's device and transmitted to the site by the user. Therefore, a user will also have full control over the use of cookies. The user can deactivate or restrict the transmission of cookies by changing the settings in their Internet browser. Cookies that have already been saved can be deleted at any time. This can also be done automatically. If cookies are deactivated for the website, it is possible that not all functions of the website can be used to their full extent.

6. Contact via Email

6.1. Description and scope of data processing

- 6.1.1. The user can get in contact via the email address provided on the website. In this case the personal data of the user transmitted with the email will be stored. The data will be used exclusively for the processing of the conversation.

6.2. Purpose of data processing

- 6.2.1. If the user gets in contact by sending an email, this also constitutes the necessary legitimate interest in the processing of the data.

6.3. Legal basis for data processing

- 6.3.1. If the user has given consent, the legal basis for processing the data is Art. 6 (1)(a) UK GDPR.
- 6.3.2. The legal basis for the processing of data transmitted while sending an email is Art. 6 (1) (f) UK GDPR. If the purpose of the email contact is to conclude a contract, the additional legal basis for the processing is Art. 6 (1) (b) UK GDPR.

6.4. Duration of storage

- 6.4.1. The data will be deleted as soon as it is no longer necessary to achieve the purpose for which it was collected. For personal data sent by email, this is the case when the respective conversation with the user has ended. The

conversation ends when it can be concluded from the circumstances that the matter in question has been conclusively resolved.

- 6.4.2. The additional personal data collected during the sending process will be deleted after a period of seven days at the latest.

6.5. Objection and removal

- 6.5.1. The user has the possibility to withdraw consent to the processing of their personal data at any time. If the user gets in contact by email, they can object to the storage of their personal data at any time.

Email: dpo@coombehouse.org.uk

In this case, all personal data stored while establishing contact will be deleted.

7. Contact form

7.1. Description and scope of data processing

- 7.1.1. A contact form is available on the website, which can be used for electronic contact. If a user makes use of this option, the data entered in the input mask will be transmitted and stored.

- 7.1.2. When sending the message, the following data will also be stored:

- Email address
- First name
- Last name
- IP address of the user's device
- Date and time of contact

7.2. Purpose of data processing

- 7.2.1. The processing of the personal data from the input mask as well as if the user gets in contact by mail, serves exclusively for the purpose of establishing contact.

- 7.2.2. The other personal data processed during the sending process serve to prevent misuse of the contact form and to ensure the security of the information technology systems.

7.3. Legal basis for data processing

- 7.3.1. The legal basis for the processing of data transmitted while sending an email is Art. 6 (1) (f) UK GDPR. The legitimate interest is to provide the user with the best possible response to the request they send via the contact form. If the purpose of the email contact is to conclude a contract, the additional legal basis for the processing is Art. 6 (1) (b) UK GDPR.

7.4. Duration of storage

- 7.4.1. The data will be deleted as soon as they are no longer necessary to achieve the purpose for which they were collected. For the personal data from the input mask of the contact form and those sent by email, this is the case when the respective conversation with the user has ended. The conversation ends when it can be inferred from the circumstances that the facts in question have been conclusively clarified.
- 7.4.2. The additional personal data collected during the sending process will be deleted after a period of seven days at the latest.

7.5. Objection and removal

- 7.5.1. If the user gets in contact via the input mask in the contact form or via e-mail, the user can object to the storage of their personal data at any time.

Email: dpo@coombehouse.org.uk

In this case, all personal data stored while establishing contact will be deleted.

8. Corporate web profiles on social networks

8.1. Use of corporate profiles on social networks:

- 8.1.1. Facebook - on the company / school profiles, information is provided, and Facebook users are offered the possibility of communication. If the user carries out an action on the Facebook profile (e.g. comments, contributions, likes etc.), they may make personal data (e.g. name or photo of their user profile) public. However, as the Company generally or to a large extent have no influence on the processing of a user's personal data by Facebook, the Company cannot make any binding statements regarding the purpose and scope of the processing of the data.
- 8.1.2. The corporate profile on social networks is used for communication and information exchange with existing and potential customers and the general public. It is used to provide information about the services offered. Every user is free to publish personal data.
- 8.1.3. As far as a user's personal data is processed in order to evaluate their online behaviour or to conduct lead campaigns, this is done on the basis of the users express declaration of consent, Art. 6 (1) (a), Art. 7 UK GDPR. The legal basis for processing personal data for the purpose of communicating with customers and interested parties is Art. 6 (1) (f) UK GDPR. Thereby, the legitimate interest is to answer the users request optimally or to be able to provide the requested information. If the aim of contacting the user is to conclude a contract, the additional legal basis for the processing is Art. 6 (1) (b) UK GDPR.

- 8.1.4. The data generated on the company profile is not stored on the Company systems.
- 8.1.5. For the processing of a user's personal data in third countries, appropriate guarantees in form of standard data protection clauses have been provided pursuant to Art. 46 (2) (c) UK GDPR. The Company have concluded these standard data protection clauses with the above-mentioned providers. A copy of the standard data protection clauses can be requested.

9. Hosting

- 9.1. The website is hosted on servers of a service provider commissioned by the Company. The service provider is: Wordpress.
- 9.2. The servers automatically collect and store information in so-called server log files, which the users browser automatically transmits when they visit the website. The stored information is:
- Browser type and version
 - Used operating system
 - Referrer URL
 - Hostname of the accessing computer
 - Time and date of the server request
 - IP address of the user's device
- 9.3. This data will not be merged with other data sources. The data is collected on the basis of Art. 6 (1) (f) UK GDPR. The website operator has a legitimate interest in the technically error-free presentation and optimization of the website - and server log files are therefore recorded.

10. The server of the website is geographically located in the United States of America.

Usage of Plugins

10.1. Contact Form 7:

10.1.1. Scope of processing of personal data

- 10.1.1.1. The Wordpress plugin Contact Form 7 of RockLobster LLC, Sakai 810-0001 Fukuoka Prefecture Chuo-ku Tenjin 1-chome 8-1, Fukuoka City Hall, Japan (Hereinafter referred to as RockLobster) is used for the administration of contact forms on the website. The data entered in the form will be transferred by email. This allows personal data to be stored and evaluated, in particular the user's activity (in particular which pages have been visited and which elements have been clicked on) and device and browser information (in particular the IP address and the operating system). Data can be transferred to RockLobster

servers in Japan. With regard to Japan, there is a European Union adequacy decision. You can find it here: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L:2019:076:TOC>. Further information about the collection and storage of data by Contact Form 7 can be found here: <https://contactform7.com/privacy-policy/>.

10.1.2. Purpose of data processing

- 10.1.2.1. The use of the Contact Form 7 Plugins serves the improvement of the user friendliness of the website. This plug-in is used to easily create, integrate and present contact forms in an appealing way.

10.1.3. Legal basis for the processing of personal data

- 10.1.3.1. The legal basis for the processing of personal data is the user's given consent in accordance with Art. 6 (1) (a) UK GDPR.

10.1.4. Duration of storage

- 10.1.4.1. The users personal information will be stored for as long as is necessary to fulfil the purposes described in this Privacy Policy or as required by law, e.g. for tax and accounting purposes.

10.1.5. Possibility of revocation of consent and removal

- 10.1.5.1. The user has the right to revoke their declaration of consent under data protection law at any time. The revocation of the consent does not affect the lawfulness of the processing carried out on the basis of the consent up to the revocation.
- 10.1.5.2. The user can prevent Contact Form 7 from collecting and processing their personal data by preventing the storage of third-party cookies on their computer, by using the "Do Not Track" feature of a supporting browser, by disabling the execution of script code in your browser, or by installing a script blocker such as NoScript (<https://noscript.net/>) or Ghostery (<https://www.ghostery.com>) in their browser. For more information about opting out of Contact Form 7 and opting out of its use, please visit: <https://contactform7.com/privacy-policy/>.

10.2. Use of Google Analytics

10.2.1. Scope of processing of personal data

- 10.2.1.1. Google Analytics are used, which is a web analysis service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA and its representative in the Union Google Ireland Ltd., Gordon House, Barrow Street, D04 E5W5, Dublin, Ireland (Hereinafter referred to as Google). Google Analytics examines, among other

things, the origin of visitors, their length of stay on individual pages and the use of search engines, thus allowing better monitoring of the success of advertising campaigns. Google places a cookie on your computer. This allows personal data to be stored and evaluated, in particular the user's activity (in particular which pages have been visited and which elements have been clicked on), device and browser information (in particular the IP address and the operating system), data on the advertisements displayed (in particular which advertisements have been displayed and whether the user has clicked on them) and also data on advertising partners (in particular pseudonymised user IDs). The information generated by the cookie about the users use of this website will be transmitted to and stored by Google on servers in the United States. However, if IP anonymisation is enabled, Google will truncate (crop or shorten) the users IP address within the EU/EEA before it is transferred. Only in exceptional cases is the full IP address transmitted to a Google server in the USA and shortened there. On behalf of the operator of this online presence, Google will use this information to evaluate the users use of the online presence, to compile reports on the activities of the online presence and to provide further services associated with the use of the online presence and the Internet use to the operator of the online presence. The IP address transmitted by the users browser as part of Google Analytics is not combined with other data from Google. The user may refuse the use of cookies by selecting the appropriate settings on their browser, however, please note that if this is done they may not be able to use the full functionality of the website. Further information on the collection and storage of data by Google can be found here: <https://policies.google.com/privacy?hl=en-GB>.

10.2.2. Purpose of data processing

- 10.2.2.1. The purpose of processing personal data is to specifically address a target group that has already expressed an initial interest by visiting the site.

10.2.3. Legal basis for the processing of personal data

- 10.2.3.1. The legal basis for the processing of personal data is the user's given consent in accordance with Art. 6 (1) (a) UK GDPR.

10.2.4. Duration of storage

- 10.2.4.1. The personal information will be stored for as long as is necessary to fulfil the purposes described in this Privacy Policy or as required by law. Advertising data in server logs is anonymized by Google's own

statements to delete parts of the IP address and cookie information after 9 and 18 months respectively.

10.2.5. Possibility of revocation of consent and removal

10.2.5.1. The user has the right to revoke their declaration of consent under data protection law at any time. The revocation of the consent does not affect the lawfulness of the processing carried out on the basis of the consent up to the revocation. The user may prevent the collection and processing of their personal data by Google by preventing the storage of cookies by third parties on their computer, by using the "Do Not Track" function of a supporting browser, by deactivating the execution of script code in their browser or by installing a script blocker such as NoScript (<https://noscript.net/>) or Ghostery (<https://www.ghostery.com>) in their browser. The user can prevent the processing of this data by Google by downloading and installing the browser plug-in available under the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>

With the following link the user can deactivate the use of their personal data by Google: <https://adssettings.google.com/>. Further information on objection and removal options against Google can be found at:

<https://policies.google.com/privacy?gl=EN&hl=en>.

10.3. Use of Matomo

10.3.1. Scope of processing of personal data

10.3.1.1. The open-source tracking tool Matomo (<https://matomo.org/>) is used to analyse the surfing behaviour of the users. Matomo places a cookie on the user's computer. This allows personal data to be stored and evaluated, in particular the user's activity (in particular which pages have been visited and which elements have been clicked on), device and browser information (in particular the IP address and the operating system), data on the advertisements displayed (in particular which advertisements have been displayed and whether the user has clicked on them) and also data on advertising partners (in particular pseudonymised user IDs). The software is set so that the IP addresses are not stored completely, but 2 bytes of the IP address are masked for anonymization (e.g.: 192.168.xxx.xxx). In this way, it is no longer possible to assign the shortened IP address to the calling computer. The data is stored in our MySQL database. Logs or report data are not sent to Matomo servers. For more information about Matomo's

collection and storage of data, please visit:
<https://matomo.org/privacy-policy/>.

10.3.2. Purpose of data processing

- 10.3.2.1. The processing of users' personal data enables us to analyse the surfing behaviour of the users. By evaluating the data collected, the Company is able to compile information on the use of the individual components of the website. This helps the Company to constantly improve the website and its user-friendliness.

10.3.3. Legal basis for the processing of personal data

- 10.3.3.1. The legal basis for the processing of personal data is the user's given consent in accordance with Art. 6 (1) (a) UK GDPR.

10.3.4. Duration of storage

- 10.3.4.1. The personal information will be stored for as long as is necessary to fulfil the purposes described in this Privacy Notice or as required by law, e.g. for tax and accounting purposes.

10.3.5. Possibility of revocation of consent and removal

- 10.3.5.1. The user has the right to revoke their declaration of consent under data protection law at any time. The revocation of the consent does not affect the lawfulness of the processing carried out on the basis of the consent up to the revocation. The user can prevent Matomo from collecting and processing the personal data by preventing the storage of cookies from third parties on their computer, by using the "Do Not Track" function of a supporting browser, by deactivating the execution of script code in their browser or by using a script blocker such as NoScript (<https://noscript.net/>) or Ghostery (<https://www.ghostery.com>) in their browser. With the following link the user can deactivate the processing of their personal data by Matomo: <https://matomo.org/privacy-policy/>. For more information on objection and removal options against Matomo please visit: <https://matomo.org/privacy-policy/>

10.4. Use of Wordfence Security

10.4.1. Scope of processing of personal data

- 10.4.1.1. The website uses functions of Defiant Inc., 800 5th Ave., Suite 4100, Seattle, WA 98104, USA (Hereinafter referred to as Defiant). Wordfence Security secures our online presence and protects visitors from viruses and malware. When the user visits a page with a plugin, a direct connection is established between their computer and the

Defiant Server. In order to recognize whether the visitor is a human or a bot, the plug-in sets cookies. Additional personal data may be stored and evaluated, in particular device and browser information (in particular IP address and operating system). It is possible to evaluate the behaviour from the sent notifications (e.g. how often a page is called up). To protect against brute force and DDoS attacks or comment spam, IP addresses are stored on the Wordfence servers. IP addresses that are classified as acceptable are placed on a whitelist. Further information on the collection and storage of data by Defiant can be found here: <https://www.wordfence.com/privacy-policy/>.

10.4.2. Purpose of data processing

- 10.4.2.1. The website uses the plug-in to protect against viruses and malware and to ward off attacks by computer criminals.

10.4.3. Legal basis for the processing of personal data

- 10.4.3.1. The legal basis for the processing of personal data is the user's given consent in accordance with Art. 6 (1) (a) UK GDPR.

10.4.4. Duration of storage

- 10.4.4.1. The personal information will be stored for as long as is necessary to fulfil the purposes described in this Privacy Policy or as required by law, e.g. for tax and accounting purposes.

10.4.5. Possibility of revocation of consent and removal

- 10.4.5.1. The user has the right to revoke their declaration of consent under data protection law at any time. The revocation of the consent does not affect the lawfulness of the processing carried out on the basis of the consent up to the revocation. The user can prevent Wordfence Security from collecting and processing your personal data by preventing the storage of third-party cookies on their computer, by using the "Do Not Track" function of a supporting browser, by deactivating the execution of script code in their browser, or by installing a script blocker such as NoScript (<https://noscript.net/>) or Ghostery (<https://www.ghostery.com>) in the browser. The user can find further information on objection and removal options against Wordfence Security at:

<https://www.wordfence.com/privacy-policy/>
<https://www.wordfence.com/privacy-policy/>.

11. Version control

Date of adoption of this notice, by or on behalf of the Proprietor	February 2023
Date of last review of this notice	August 2025
Date for next review of this notice	July 2026
Notice owner (Proprietor)	Dorset Centre of Excellence