



Palm Global
Academy

PALM GLOBAL ACADEMY

PRIVACY POLICY

2026/2027

1. Introduction

Palm Global Academy (PGA) is an online school committed to protecting the privacy and security of students, parents, guardians, mentors, staff, and website users. This Privacy Policy explains how we collect, use, store, share, and protect personal data through our website, learning platforms, communication systems, admissions process, and educational services.

This privacy notice provides you with details of how we collect and process your personal data through our online portal Compass Education as well as our website palmglobalacademy.com.

Personal Data is any information from which a living individual can be identified. The school will need to process the personal data of applicants, pupils, parents, guardians and mentors in order to perform its contractual obligations and because it has a legitimate interest in doing so.

The types of personal data the school will process include names, dates of birth, contact details, nationality, medical and health information (where appropriate), passports or other national identification documents, curriculum and assessment information, attendance records, level of English proficiency, information relating to special educational needs or disabilities, previous school(s) information (including references and assessment data), information relating to safeguarding (where appropriate), images of pupils and the financial information of parents and guardians.

Special Category Data: Some of this is defined as special category or 'sensitive' personal data. That information is only processed with the consent of the individual concerned, where it is needed to comply with a legal obligation or if it must be processed to protect a student's vital interests.

Data Collection: The school collects personal data in a number of ways. For example, parents, guardians and mentors will provide personal data about themselves and their children in correspondence, online forms (including enquiry and application forms), documents, in discussions with the school and via agents or websites. Information about pupils will be gathered directly as part of their tuition and be created and developed by the school over the course of their education at the school. It may also be provided by third parties such as local or government bodies or medical professionals where appropriate.

2. How does the school use my personal data?

Admission: The school will use the personal data of parents, guardians, mentors, applicants and pupils to make decisions relating to admissions, assessment, and the charging and recovery of fees.

Education: The school's primary purpose is to provide education and learning for our students, including enabling participation in classes, assignments, assessments and the monitoring and reporting of our student's academic progress.

Lesson recording: As an online school, lessons are recorded for safeguarding, quality assurance, academic support, teacher development, student revision, and continuity purposes. We use a feature of Zoom that only records the teacher and any screen they share.

Communication Data: Any communication that you send to us whether that be through our online portal, the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us.

Legal and administrative purposes: This is to ensure and to facilitate the safe and efficient operation of the school and to ensure that the school complies with its legal obligations.

3. Other than for educational purposes, where else could my personal data be used?

Customer data includes data relating to any purchases in relation to the school, such as your name, title, billing address, delivery address email address, phone number, contact details, purchase details and card details. We process this data to ensure that school fees are paid and that the student/s are fully registered on the school admissions. We also hold a record of these transactions to ensure transparency for both parents and the school. Our lawful ground for this processing is the performance of a contract between you and us and/or taking steps at your request to enter into such a contract.

User data includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain backups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.

Technical data includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and decide our marketing strategy.

Marketing data includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. Our lawful ground for this processing is our legitimate interests which in this case are to study what interests potential students and their parents to our school and to help grow our business and to decide our marketing strategy.

We may use customer data, user data, and marketing data to deliver relevant website content and advertisements to you (including Facebook adverts or other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is legitimate interest which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests such as to grow our business.

3. Sharing Personal data

Competent Authorities: Where it is appropriate and lawful to do so the school may share information with local and national government bodies, Children's Services and Skills (Ofsted) and other regulators or exam boards.

Third Party Service Providers: the school may engage third parties to provide it with services that it needs for its operation, including but not limited to IT service providers, internet service providers, external examiners and assessors, content providers, professional advisers, our insurers and consultants. Personal Data will only be shared with these parties to the extent that is necessary and will always be subject to appropriate confidentiality provisions.

Educational Providers and employers may be given personal data in response to a reference request or in order to verify information that is provided to the school as part of the admission process or for safeguarding reasons.

We are subject to the provisions of the general data protection regulations that protect your personal data. Where we transfer your data to third parties outside of the EEA, we will ensure that certain safeguards are in place to ensure a similar degree of security for your personal data.

4. Data Retention

Secure: The school will securely store the personal data in its possession for as long as it is needed for the purposes for which it was originally collected unless the law requires or permits it to be kept for longer. For example, data may need to be retained to bring or defend legal claims or for quality assurance purposes.

Research: Some personal data may be retained for longer than usual for historical research or statistical purposes and where that is the case the school will only keep the minimum amount of data that it needs for those purposes and will also consider the extent to which that data can be anonymised.

In case we need to use your details for an unrelated new purpose, we will let you know and explain the legal grounds for processing. We may process your personal data without your knowledge or consent where this is required or permitted by law. We do not carry out automated decision making or any type of automated profiling.

5. Your rights

As an online school, we have a very active web presence and use social media as one of our daily tools. Students will have the opportunity to appear on our website and on our social media in many ways, including in photographs, video, sound recordings and posts. When we do this, we will seek explicit consent from parents and students prior to the publication of any of the above.

Under certain circumstances individuals have rights under data protection laws in connection with their personal data. Those rights include the right to access personal data, the right to correction, request erasure, object to processing, request the restriction of the processing of personal data, to transfer personal data and to withdraw consent. Please note that some of these rights are qualified and whether they are available may vary depending on the circumstances.

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The school will not charge a fee to provide access to personal data (or to enable the exercise of any other rights), but it may charge a reasonable fee if a request is clearly unfounded, repetitive or excessive. Alternatively, the school may refuse to comply with a request in those circumstances.

Identity: The school may need to request specific information from individuals to help it confirm identity and verify the right to access personal data or to any of the other rights that have been referred to. This is a security measure to ensure that personal data is handled in accordance with the law and is not disclosed to anyone that does not have the right to receive it.

If you wish to exercise any of the rights set out above, please email us at:

info@palmglobalacademy.com

By signing this agreement, you agree and consent to our processing of the information you provide to us for the purposes outlined above which shall include, where necessary, the processing of sensitive personal data which relates to your child. Please note, you have the right to ask for a copy of the information we retain on your child or yourself and to correct any inaccuracies that may be contained within it.

6. Internet Security

Palm Global Academy will take all reasonable precautions and apply spam and virus protection to all school email accounts; however, the school are not responsible for any unwanted emails appearing in student's school email accounts.

Palm Global Academy will take all reasonable steps to ensure that your child uses the facilities of the school platform for appropriate purposes, but your child will be held accountable for his/her use of the school email services and the online social community and that deliberate misuse will be treated as a breach of our school rules.

Parents give permission for the Head Teacher to monitor the use of the school's services at any time.

In order to protect students from unsuitable contacts on the internet, students will have passwords and must only make contact with other students and staff in the authorised classrooms, message boards, email accounts and lessons and online communities set up by Palm Global Academy.

All students will have their identities verified before acceptance into Palm Global Academy.

I hereby agree and consent to Palm Global Academy in processing information I provide for the purposes outlined above which shall include, where necessary, the processing of sensitive personal data which relates to my child.

Name of parent/legal guardian _____

Name of child _____

Signed

Date