

# How we handle your data.

What we collect, why, how long we keep it, and your rights.

DRAFT v0.1 · Pending legal review. Not a binding document until signed off.

## WHO WE ARE

### Who we are

The data controller is School Summit Innovator, part of the School Summit family. You can reach our Data Protection Officer at [privacy@schoolsummit.com](mailto:privacy@schoolsummit.com).

## WHAT WE COLLECT

### What we collect

- Account data — name, email, school, year group, role.
- Entry data — the content of your competition entry.
- Usage data — server logs, privacy-respecting analytics, account activity.
- Communications — emails you send us, support tickets, your preferences.

## LAWFUL BASIS

### Lawful basis

- Contract — to run the competition you have entered.
- Legitimate interest — to keep the service secure and improve it.
- Consent — for marketing emails, photo/video publication, sharing with sponsors.
- Legal obligation — where we must retain or disclose data by law.

## WHO SEES IT

### Who sees it

Your entry is visible to the team running the programme, to assigned judges, and — if you reach the shortlist or final — to relevant sponsors and audiences for that stage. We never sell personal data. We never share contact details with sponsors or third parties without explicit, granular consent.

## RETENTION

### Retention

- Account data — for as long as your account is active, plus 24 months for inactive accounts.
- Entry data — retained for the public record of the programme (Hall of Fame). You can request removal from public records at any time.

- Communications — 24 months from last contact.
- Server logs — 90 days.

#### YOUR RIGHTS

## Your rights

Access, rectification, erasure, restriction, objection, portability, withdraw consent and complain to the ICO (UK) or Data Protection Commission (Ireland). To exercise any of these, email [privacy@schoolsummit.com](mailto:privacy@schoolsummit.com). We respond within 30 days.

#### INTERNATIONAL TRANSFERS

## International transfers

We process data within the UK and EEA. Where we use sub-processors outside the UK/EEA we rely on the UK International Data Transfer Agreement or EU Standard Contractual Clauses.

#### CHILDREN

## Children

This programme is designed for students aged 15–19. We follow the ICO Children's Code (Age-Appropriate Design Code) and equivalent frameworks. Parents and guardians have a direct contact in our DSL.



