Compass Connections
Founded 2011
www.compassconnections.co.uk

Data Privacy Notice and UK GDPR Compliance

Published September 2026

COMPASS CONNECTIONS

Compass Connections has been nurturing wellbeing through imaginative and creative explorations since 2011. We support schools nationwide in nurturing wellbeing techniques for young people, focusing on regulation strategies which are easy and manageable for the young people to implement and are sustainable in the long term for their mental and emotional health.

Our sessions are provided in-person, with a wealth of regularly updated online resources to access, for both schools and young people. They are in line with the DFE statutory guidance on 'Physical Health and Mental Wellbeing for Primary and Secondary schools' (2025).

It is led by Maria Caneda, who is the Director of Wellbeing and Learning, with over 25 years of experience in education. Her previous roles include classroom teacher, senior leader, and consultant.

Compass Connections also delivers CPD training for primary colleagues.

Contact Details: Maria Caneda maria@compassconnections.co.uk

Data Privacy Notice

This data privacy notice tells you (the client) what to expect us (Compass Connections) to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- Sharing information outside the UK
- How to complain

Review

As an organisation, we review this notice annually in line other relevant statutory guidance.

Signed: Maria Caneda

Date Approved: 15/09/2026

Date Reviewed: 15/09/2027

Data Privacy at Compass Connections

Compass Connections is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the UK GDPR (General Data Protection Regulation) compliances. It applies to all clients.

From 19 June 2026 the processing of personal data is to be governed by the UK General Data Protection Regulation (GDPR). 'Processing' here includes the collection, recording, and use of personal data, whether by manual or electronic means, and the privacy and any dissemination of that information.

'Personal data' is defined as such data relating to a living individual who can be identified from that data. Identification can be by the personal data alone, or in conjunction with any other information in the data controller's possession or likely to come into such possession.

Compass Connections is the data controller in this instance. The Client is the data subject. This means that Compass Connections is responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former clients. This notice does not form part of any contract to provide services. We may update this notice at any time.

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website.

We will comply with Data Protection Law. This says that the personal information we hold about you must be:

a) Used lawfully.
b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
c) Relevant to the purposes we have told you about and limited only to those purposes.
d) Accurate and up to date
e) Kept only as long as necessary for the purposes we have told you about.
f) Kept securely

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

Your right of access	You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.
Your right to rectification	You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete.
Your right to erasure	You have the right to ask us to delete your personal information.
Your right to restriction of processing	You have the right to ask us to limit how we can use your personal information.
Your right to object to processing	You have the right to object to the processing of your personal data.
Your right to data portability	You have the right to ask that we transfer the personal information you gave us to another organisation, or to you.
Your right to withdraw consent	When we use consent as our lawful basis you have the right to withdraw your consent at any time.

If you make a request, we must respond to you without undue delay and in any event within one month.
To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

What information we collect and use

Personal data means any information about an individual from which that person can be identified. It does not include data where the identify has been removed.

The data we collect, and use are dependent on the services we are contracted to deliver or are legally required to hold.

	Information we collect and use	Our lawful bases for collecting or using personal information
Primary School Services / and Education Organisations:	• Name and email contact details for the point of contact	• Consent - we have permission from you after we gave you all the relevant information. All your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time. • Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All your data protection rights may apply except the right to object. • Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability. • Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. • Our legitimate interests are that we need to collect this information to provide our services to schools and families of primary age children.
Parents and Carers at our after-school provision:	• Name and email contact details for the point of contact (parents, guardians, carers) • Name of the child • Date of birth of the child • Any relevant medical or allergy information	

	Information we collect and use	Our lawful bases for collecting or using personal information
Dealing with queries, complaints or claims:	• Name and email contact details for the point of contact • Payment details • Purchase or service history • Information relating to health and safety (including incident investigation details and reports and accident book records)	• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time. • Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object. • Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability. • Recognised legitimate interests - our pre-approved purpose for collecting or using personal information for dealing with queries, complaints or claims. • We may need to share personal information with a public authority or another organisation because they need it for their public tasks or official functions (the 'public task disclosure response condition'), We need to respond to, or deal with, an emergency event or situation (the 'emergencies condition')., We need to protect the physical, mental or emotional well-being of people who need extra support, or to protect them from harm or neglect (the 'Safeguarding condition').

	Information we collect and use	Our lawful bases for collecting or using personal information
Information updates or marketing purposes:	• Names and email contact details • Marketing preferences	• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time. • Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object. • Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability. • Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are that we need to collect this information to provide our services to schools and families of primary age children. • For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above. • Recognised legitimate interests - our pre-approved purpose for collecting or using personal information for information updates or marketing purposes. • We need to share personal information with a public authority or another organisation because they need it for their public tasks or official functions (the 'public task disclosure response condition')., We need to respond to, or deal with, an emergency event or situation (the 'emergencies condition')., We need to protect the physical, mental or emotional well-being of people who need extra support, or to protect them from harm or neglect (the 'Safeguarding condition'). • Vital interests - collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

	Information we collect and use	Our lawful bases for collecting or using personal information
Recruitment purposes	• Contact details (eg name, address, telephone number or personal email address) • Date of birth • Education history (eg qualifications) • Details of any criminal convictions (eg DBS)	• Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time. • Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object. • Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability. • Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are that we need to collect this information to provide our services to schools and families of primary age children. • For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above. • Recognised legitimate interests - our pre-approved purpose for collecting or using personal information to comply with legal requirements: • We need to share personal information with a public authority or another organisation because they need it for their public tasks or official functions (the 'public task disclosure response condition')., We need to respond to, or deal with, an emergency event or situation (the 'emergencies condition')., We need to protect the physical, mental or emotional well-being of people who need extra support, or to protect them from harm or neglect (the 'Safeguarding condition'). • Vital interests - collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
Legal requirements compliance	• Criminal offence data (including Disclosure Barring Service (DBS)) • Safeguarding information • Any other personal information required to comply with legal obligations	

We will only use the client's personal information when the law allows us to. Most commonly, we will use the information in the following circumstances:

a) Where we need to perform the contract that we have entered into
b) Where we need to comply with a legal obligation

Failing to provide personal information

If the client fails to provide certain information when requested, we may not be able to perform the contract we have entered into with them or may be prevented from complying with our legal obligations.

How we share personal information

We may have to share your data with third parties, including third party service providers and other entities in the group.

We require third parties to respect the security of your data and treat it in accordance with the law.

We may transfer your personal data outside of the UK. If we do, you can expect a similar degree of protection in respect of your personal information.

Third party service providers

'Third parties' includes third-party service providers.

The following third-party service providers process data about you for the following purposes:

Microsoft Outlook United States*	Email communications – for the marketing, information sharing and email correspondence between clients and Compass Connections at maria@compassconnections.co.uk
EE Mobile Network (part of the BT Group)	Telephone and text messaging correspondence between clients and Compass Connections
one.com United States*	Website communications from www.compassconnections.co.uk
Starling Bank	Fees paid into Compass Connections Bank account. Starling Bank is registered in England and Wales as Starling Bank Limited (No. 09092149), London EC2M 2PP. www.starlingbank.com/legal/privacy-notice/
Social Media accounts	Instagram, Blusky, X (Formerly Twitter) and Facebook.
Class For Kids	regarding after-school booking system. 180 W George St, Glasgow G2 2NR www.classforkids.com

** We may transfer the personal information we collect about you to the United States in order to perform our contract with you. The UK governs personal data transfers to third parties in the United States primarily through the **UK-US Data Bridge** (the UK Extension to the EU-US Data Privacy Framework) under the Data Protection (Adequacy) (United States of America) Regulations 2023.*

Third-party service providers security

All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specific purposes and in accordance with out instruction.

Compass Connections will not share your personal information with other third-party entities.

Managing Data Security

We have put in place measures to protect the security of your information and to prevent your personal information from being accidently lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal information to those who have a contractual obligation to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other mean and the applicable legal requirements.

In some circumstances, we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such further information without further notice to you. Once you are no longer a client of the company, we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

With regard to marketing correspondence, we seek to obtain an active opt-in subscribing communication service. In this case, we will retain your personal email address unless the client unsubscribes from our marketing and email correspondence.

Clients' duty to inform of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your client relationship with us.

Rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information commonly known as a 'data subject access request'. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below)
- **Object to processing** of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enable you to ask us to suspend the processing of personal information about you
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the main point of contact at Compass Connections in writing via email.

You will not have to pay a fee to access your personal information. However, we may change a reasonable fee if your request for access is repetitive or excessive.

We may need you to request specific information from you to help us confirm your identity and ensure your right to access the information. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no tight to receive it.

In the circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw from consent, please contact Compass Connections in writing via email. Once we have received this notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agree to, unless we have another legitimate basis for doing so in law.

Changes Data Privacy Notice

We reserve the right to update this privacy notice at any time and will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Queries or Complaints

If you have any concerns about our use of your personal information, you can make a data protection complaint to us maria@compassconnections.co.uk

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline number: 0303 123 1113
Website: www.ico.org.uk/make-a-complaint

REPLY FORM

Data Privacy Notice

In compliance with UK GDPR (2026)

ACTIVE OPT-IN

I acknowledge that I have received the **Data Privacy Notice** and that I have read and understood it.

Name	
School / Organisation	
Role	
Contact email	
Signature	
Date	

Please return this reply slip and keep a copy for your records.
Thank you