Privacy Notice

November 2026 (V1.1)

This privacy notice applies to the Cokethorpe Estate website (cokethorpeestate.co.uk) and to the commercial lettings, events and venue hire activities operated under the Cokethorpe Estate brand.

1. Who we are

The Cokethorpe Estate is the commercial brand of Cokethorpe School. The commercial activities of the Estate — including venue hire, weddings, corporate events, sports facility lettings and conference services — are operated by **Cokethorpe Enterprises Limited** (CEL), the wholly-owned trading subsidiary of **Cokethorpe Educational Trust Limited** (CET Ltd).

Both entities are **joint controllers** of the personal data described in this notice. This means they jointly determine the purposes and means of the processing:

- **Cokethorpe Enterprises Limited** enters into commercial contracts with Estate customers, issues invoices and processes payments.
- **Cokethorpe Educational Trust Limited** provides the staff, premises, IT systems and data protection governance through which the processing is carried out. All staff who handle your personal data are employed by CET Ltd.

Their respective responsibilities are set out in a written joint controller arrangement in accordance with Article 26 of the UK GDPR, the essence of which is reflected in this notice.

	Cokethorpe Educational Trust Limited	Cokethorpe Enterprises Limited
Company number	00767293	15511282
Charity number	309650	N/A (not a charity)
Registered address	Cokethorpe School, Witney, Oxfordshire OX29 7PU	
ICO registration	Z5441947	registered but not yet received the number.

Regardless of which entity you deal with, you may exercise your data protection rights against either of them. In practice, all queries and requests are handled by a single contact point — see section 2.

2. Our data protection contact

The Bursar of Cokethorpe School is the designated data protection contact for both joint controllers and will deal with any query, request or complaint about how we use your personal data.

- **Email:** bursar@cokethorpe.org
- **Telephone:** 01993 892327
- **Address:** The Bursar, Cokethorpe School, Witney, Oxfordshire OX29 7PU

3. What this notice covers

This notice explains how we collect, use, store and share personal data when you:

- visit the Cokethorpe Estate website (cokethorpeestate.co.uk);
- enquire about or book a wedding, private celebration, corporate event, sports facility hire or other commercial service;
- attend an event or function at the Estate;
- register interest in the nursery setting advertised on the Estate website;
- contact us by telephone, email or through a form on the website; or
- are recorded on CCTV while on the Estate premises.

If you are a parent, pupil or prospective family of Cokethorpe School, the School's main **Privacy Notice** (published at www.cokethorpe.org) applies to the processing of your personal data in that capacity. If you are a member of staff, the **Staff Privacy Notice** applies. This Estate Privacy Notice covers only the commercial and events-related processing described above.

4. What personal data we collect

The personal data we collect depends on how you interact with us. It may include:

Enquiry and booking information

- Your name, email address, telephone number and postal address
- The type and date of your event
- The number of guests expected
- Catering requirements, including dietary needs and food allergies
- Any accessibility requirements you tell us about
- Payment and billing information
- Bank account details (sort code, account number and account holder name) where a refund is due
- Details of your suppliers (e.g. florists, photographers, caterers) where you share them with us

Nursery interest registration

- Your name and contact details
- Your child's name and date of birth
- Any additional information you choose to provide

If your child is subsequently offered a nursery place, the School's main Privacy Notice will apply from that point.

Website usage data

- Your IP address, browser type and operating system
- Pages visited, time spent on each page and referral source
- Cookie data — see section 10 below

CCTV

- Images captured by CCTV cameras in operation at the entrance to the site and in external areas around the Estate grounds and car parks. CCTV is not in operation inside event venues.

Event photography and video

- Where the Estate photographs or films an event for its own promotional purposes, we will ask for your consent in advance. You are free to decline.

5. How we collect your personal data

We collect personal data:

- **Directly from you** — when you complete an enquiry form, send us an email, telephone us, meet us at a show or visit, or correspond with us about a booking.
- **From your device** — when you visit the Estate website, through cookies and similar technologies (see section 10).
- **From third parties** — occasionally from recommended suppliers, wedding platforms or event directories, where you have given them permission to share your details with venues.
- **From CCTV** — automatically when you enter an area covered by CCTV on the Estate premises.

6. Why we use your personal data and our lawful bases

We use your personal data for the purposes set out below, together with the lawful basis on which we rely in each case.

Purpose	Lawful basis (Article 6 UK GDPR)
Responding to your enquiry about a wedding, event or venue hire	**Legitimate interests** — it is in our legitimate interest to respond to enquiries and to promote the Estate's services. Where you proceed to a booking, the basis becomes **performance of a contract**.
Managing your booking, including liaising with your suppliers	**Performance of a contract** — necessary to fulfil our agreement with you.
Processing payments and refunds, including collecting bank details for refunds	**Performance of a contract** and **legal obligation** (e.g. tax and accounting requirements under HMRC rules).
Managing dietary and allergy information for catering	**Performance of a contract**. Where this includes health-related information (a special category), we rely on **explicit consent** (Article 9(2)(a) UK GDPR) or, where necessary to protect vital interests, Article 9(2)(c).
Processing nursery interest registrations	**Legitimate interests** — to respond to your expression of interest and to manage the admissions pipeline.
CCTV monitoring	**Legitimate interests** — for the safety and security of people on the premises and for the prevention and detection of

	crime. See the School's CCTV and Vehicle Cameras Policy for full details.
Sending you information about future Estate events or offers	**Consent** (for electronic marketing under PECR) or **legitimate interests** (for postal marketing), with an easy opt-out in every communication. See section 8.
Website analytics and cookies	**Consent** (for non-essential cookies) and **legitimate interests** (for strictly necessary cookies). See section 10.
Complying with legal or regulatory obligations	**Legal obligation**.
Establishing, exercising or defending legal claims	**Legitimate interests**.

Where we rely on legitimate interests, we have carried out a balancing assessment to ensure that our interests do not override your rights and freedoms. You have the right to object to processing based on legitimate interests — see section 12.

7. Who we share your personal data with

We share your personal data only where there is a clear reason to do so:

- **Between the joint controllers** — CET Ltd and CEL share personal data between them as necessary for the purposes described in this notice. This is inherent in the joint controller relationship.
- **Within Cokethorpe** — with colleagues in the School's finance, facilities, catering and events teams, on a need-to-know basis.
- **Suppliers you have chosen** — where you ask us to liaise with your caterer, florist, photographer, entertainment provider or other supplier in connection with your event, we will share relevant details with them.
- **Our service providers** — including our website hosting provider, payment processor, email platform and IT support provider. These organisations process data on our behalf under written contracts that require them to keep it secure and to use it only for the purposes we specify.
- **Professional advisers** — such as lawyers, insurers and accountants, where necessary.
- **Authorities** — where we are required to do so by law (e.g. HMRC, police, local authority).

We do not sell or rent your personal data to third parties.

8. Marketing

If you enquire about or book an event with us, we may wish to keep in touch with you about future events, offers and news from Cokethorpe Estate.

- **Electronic marketing** (email, text messages): we will only send this where you have given your consent, or where the "soft opt-in" exemption under the Privacy and Electronic Communications Regulations (PECR) applies — meaning you are an existing contact and the communication relates to similar services, and you have been given a clear opportunity to opt out.
- **Postal marketing:** we may send information by post where we have a legitimate interest in maintaining a relationship with you. You can opt out at any time.

Every marketing communication will include a simple way to unsubscribe or opt out. If you change your mind, you can contact us at any time using the details in section 2.

9. International transfers of personal data

Some of our service providers (for example our website hosting, email or analytics providers) may process data on servers located outside the UK. Where personal data is transferred to or accessed from outside the UK, we ensure that appropriate safeguards are in place in accordance with UK GDPR requirements, such as relying on the UK's adequacy decisions or ensuring that contracts incorporating the International Data Transfer Agreement (IDTA) or equivalent approved clauses are in place.

If you have any queries about the specific safeguards applied to international transfers of your personal data, please contact the Bursar.

10. Cookies and website analytics

The Cokethorpe Estate website uses cookies — small text files placed on your device — to help us understand how visitors use the site and to improve your experience.

Cookie type	Purpose	Lawful basis
Strictly necessary	Essential for the website to function (e.g. security, load balancing). These cannot be switched off.	Legitimate interests
Analytics	Help us understand how visitors use the site (e.g. pages visited, time on site). We use [TO BE CONFIRMED — e.g. Google Analytics / other provider] for this purpose.	Consent
Embedded content	The site may embed third-party content such as video (e.g. from a video hosting service) or 3D virtual tours (e.g. Matterport). These providers may set their own cookies when you interact with their content.	Consent

[TO BE CONFIRMED — confirm the cookie consent mechanism on the Estate website and specific cookies once Herd provides the cookie scan results.]

You can control cookies through your browser settings. Blocking some cookies may affect your experience of the website.

11. How long we keep your personal data

Data type	Retention period
Enquiries that do not proceed to a booking	12 months from the date of enquiry, then securely deleted
Booking and contract records (including invoices and correspondence)	7 years from the date of the event, in line with HMRC requirements and limitation periods
Payment card details	Not stored by us — processed securely by our payment provider

Bank details collected for refunds	Securely deleted once the refund has been processed and confirmed. The transaction record (without the full bank details) is retained for 7 years as part of the financial records.
Dietary and allergy information	Deleted within 3 months of the event, unless retained at your request for a future booking
Nursery interest registrations	Until the enquiry is resolved or 12 months, whichever is sooner. If your child is offered a place, the School's main retention schedule applies.
CCTV footage	Approximately 28 days, after which footage is automatically overwritten based on recorder capacity. Footage may be retained for longer where it is needed for a specific purpose, such as an incident investigation, a subject access request or a request from the police. Any retained footage and disclosures are recorded in the CCTV system log book. See the School's CCTV and Vehicle Cameras Policy and the CCTV and Vehicle Cameras Data Protection Impact Assessment for full details.
Website analytics data	[TO BE CONFIRMED — state the retention period set in the analytics provider]
Marketing consent records	For as long as you remain opted in, plus a suppression record retained indefinitely to ensure we respect your opt-out

12. Your rights

Under UK GDPR, you have the following rights in relation to your personal data. Some rights are subject to conditions and exemptions, and we will consider each request on its merits. You may exercise your rights against either joint controller.

Right	What it means
Access	You can ask for a copy of the personal data we hold about you.
Rectification	You can ask us to correct personal data that is inaccurate or incomplete.
Erasure	You can ask us to delete your personal data in certain circumstances (the "right to be forgotten").
Restriction	You can ask us to restrict how we use your personal data while a query or complaint is resolved.
Portability	You can ask to receive personal data you have provided to us in a structured, commonly used, machine-readable format.
Objection	You can object to processing based on our legitimate interests, including direct marketing. Where you object to direct marketing, we will stop immediately.
Withdraw consent	Where we rely on your consent, you can withdraw it at any time without affecting the lawfulness of what we did before you withdrew it.

To exercise any of these rights, please contact the Bursar using the details in section 2. We will respond within one month. In exceptional cases we may need up to two additional months, in which case we will let you know.

13. Automated decision-making

We do not carry out any automated decision-making or profiling that produces legal or similarly significant effects on you. All decisions about bookings and events are made by members of our team.

14. Data security

We take appropriate technical and organisational measures to protect your personal data against loss, misuse and unauthorised access. Access to personal data is limited to those who need it for their role, and everyone handling your information does so under a duty of confidentiality.

We have procedures for dealing with any suspected personal data breach and will notify you and the Information Commissioner's Office where we are required to do so by law.

15. Queries and complaints

If you have any questions about this privacy notice or about how we handle your personal data, please contact the Bursar:

- **Email:** bursar@cokethorpe.org
- **Telephone:** 01993 892327

If you are unhappy with how we have handled your personal data, please tell us so that we can put it right. We will acknowledge your complaint, investigate it and tell you the outcome.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

- **Website:** www.ico.org.uk
- **Helpline:** 0303 123 1113
- **Online complaint form:** https://ico.org.uk/make-a-complaint/data-protection-complaints/

The ICO recommends that you try to resolve the matter with us first.

16. Changes to this notice

We keep this privacy notice under regular review and will update it when our processing activities, the law or authoritative guidance changes. Any significant changes will be published on the Estate website. This notice was last updated in November 2026.

17. Related policies

This notice should be read alongside the following, where relevant:

- Cokethorpe School Privacy Notice (published at www.cokethorpe.org)
- CCTV Policy
- Data Protection Policy for Staff
- Guidelines on the Storage and Retention of Records
- Joint Controller Arrangement between Cokethorpe Educational Trust Limited and Cokethorpe Enterprises Limited (available on request)

18. Legislation and guidance

This notice has regard to the following, in each case the version currently in force:

- The UK General Data Protection Regulation
- The Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025
- The Privacy and Electronic Communications Regulations 2003 (PECR)
- Guidance published by the Information Commissioner's Office

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Joint controllers:

Cokethorpe Educational Trust Limited — Company number: 00767293 | Charity number: 309650 | ICO registration: Z5441947
Cokethorpe Enterprises Limited — Company number: 15511282 | ICO registration: [TO BE CONFIRMED]

Registered address (both): Cokethorpe School, Witney, Oxfordshire OX29 7PU