

Privacy Notice: Clients, Contacts, and Website Visitors

Baines Cutler Solutions Limited (BCS) is a data and business consultancy to independent schools in the UK and internationally. This notice explains how we handle personal data about our clients, prospective clients, suppliers, event attendees, and website visitors, and the rights you have. It is provided under Articles 13 and 14 of the UK General Data Protection Regulation (UK GDPR). It does not cover the school staff data and survey data that schools entrust to us for analysis: that processing is described in our separate notice, Privacy Notice: School Staff and Survey Data.

1. Who We Are

Baines Cutler Solutions Limited is a company registered in England and Wales (company number 08396603). Registered office: Orchard Grove, Knockholt Road, Halstead, Sevenoaks, Kent TN14 7EU. We are registered with the Information Commissioner's Office (ICO) and pay the data protection fee (registration reference ZC082559, registered 21 January 2026, renewed annually). For anything in this notice, contact our Data Protection Lead, Ben Walker, at privacy@bainescutler.co.uk or by post to the registered office.

2. The Personal Data We Collect

- **Business contact data:** names, job titles, work email addresses, work phone numbers, and school or organisation details of the bursars, heads, governors, HR staff, and other contacts we deal with.
- **Engagement data:** correspondence, meeting notes, transcripts of online meetings (Teams transcription is on by default, is announced at the start of the meeting, and can be turned off if you ask; recordings are deleted once notes are produced), proposals, contracts, and records of the services we provide.
- **Financial data:** billing contacts, invoicing details, and payment records.
- **Marketing data:** records of the publications, surveys, webinars, and events you have expressed interest in, and your marketing preferences.
- **Website and technical data:** IP address, browser and device information, pages visited, and the first-party analytics identifiers described in section 8.

We collect this data directly from you, from your school or organisation, from publicly available sources (such as school websites and Companies House), and from sector directories.

3. Why We Use It and Our Lawful Bases

Purpose	Lawful basis (Article 6 UK GDPR)
Delivering consultancy services, surveys, and benchmarking reports under contract	Contract: Article 6(1)(b)
Administering client relationships, correspondence, and records	Legitimate interests: running our business effectively
Invoicing, accounting, and tax records	Legal obligation: Article 6(1)(c)
Sending sector research, survey invitations, and service updates to school business contacts	Legitimate interests: business-to-business marketing relevant to recipients' roles, with an opt-out in every message
Running webinars and events	Contract and legitimate interests
Establishing, exercising, or defending legal claims	Legitimate interests

Where we rely on legitimate interests we balance them against your rights and interests. You can object at any time (section 7). We do not use your personal data for automated decision-making that has legal or similarly significant effects on you.

4. Who We Share It With

We do not sell personal data. We share it only with: our IT and software providers acting on our instructions (Microsoft 365, including Copilot, for email, storage, and collaboration; Dropbox for file storage; Zoho Campaigns and Zoho CRM for mailing lists, email distribution and client relationship records; Xero for accounting; 16i for website hosting and surveys; Google, for website statistics through Google Tag Manager and Google Analytics 4, only where you accept analytics cookies; and Anthropic, whose Claude assistant may process correspondence and documents that contain your contact details); our professional advisers (accountants, solicitors, insurers) where necessary; and public authorities where the law requires. None of these providers may use your data to train AI models.

5. International Transfers

We work with international schools, and some of our service providers store data outside the UK, including Anthropic in the United States and Zoho in the European Union. Where personal data leaves the UK we ensure an appropriate safeguard is in place: UK adequacy regulations, the ICO's International Data Transfer Agreement (IDTA), or the UK Addendum to the EU Standard Contractual Clauses, in line with the ICO's international transfers guidance (updated January 2026), and we record the assessment Article 46(1A) UK GDPR requires.

6. How Long We Keep It

We keep personal data no longer than necessary, in line with our Data Retention and Disposal Schedule. As a guide: contract and engagement records are kept for six years after the engagement ends (the limitation period for contract claims); accounting records for six years from the end of the financial year; and marketing contact data for as long as we have an active relationship, reviewed at least every two years.

7. Your Rights

You have the right to access your personal data; to have it rectified or erased; to restrict or object to its processing (including an absolute right to object to direct marketing); and to data portability where applicable. To exercise any right, email privacy@bainescutler.co.uk. We respond within one month.

You also have the right to complain to us about how we handle your personal data. We operate a complaints procedure under section 164A of the Data Protection Act 2018: we will acknowledge your complaint within 30 days and tell you the outcome without undue delay. You can also complain to the ICO at ico.org.uk or on 0303 123 1113, though we would welcome the chance to address your concern first.

8. Cookies and Analytics

Our website, bainescutler.com, uses a small number of cookies, managed through Google Tag Manager and a consent banner that appears on your first visit. Strictly necessary cookies make the site work and are set without consent. Every other cookie is set only if you accept it in the banner, and you can change or withdraw your choice at any time using the cookie settings control on www.bainescutler.com/privacy/; your choice is stored in a consent cookie so that it is remembered on this device.

Analytics. If you accept analytics cookies, we use Google Analytics 4 to measure how the site is used so that we can improve it. Google acts as our processor and the property is configured for statistics only: advertising features, Google Signals, and links to Google Ads are switched off; IP addresses are truncated; data is kept for 14 months; and it is used only to understand and improve the site. If you do not accept, no analytics cookie is set and nothing is sent to Google.

Marketing. We set no marketing or advertising cookies. If we introduce any (for example Google Ads, Microsoft Clarity, or Meta tools), they will run only with your consent through the same banner, and this notice and the table below will be updated first. Our forms are protected from automated abuse by methods that set no cookies; we do not use reCAPTCHA. Embedded Vimeo videos are set to do-not-track and set no cookie until you press play.

Cookie	Set by	Purpose	Duration
CookieConsent	bainescutler.com (Cookiebot consent banner)	Strictly necessary: stores the cookie choices you make in the banner	12 months
_ga	Google Analytics 4 (first party, bainescutler.com)	Analytics, set only with your consent: distinguishes visitors	2 years
_ga_8W8PZLYGXM	Google Analytics 4 (first party, bainescutler.com)	Analytics, set only with your consent: keeps session state for the property	2 years

9. Changes to This Notice

We review this notice at least annually. This version was prepared on 2 July 2026 and updated on 22 September. Material changes will be posted at www.bainescutler.com/privacy/, which is the single page for our privacy and cookie information.