



**Privacy Notice for**  
**Alumni (OSE) and Friends of St. Edward's**

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Linked Documents:	<ul style="list-style-type: none"><li>• Privacy Notice for Parents &amp; Guardians</li><li>• Data Retention Policy</li></ul>
External Links:	<ul style="list-style-type: none"><li>• ICO - <a href="https://ico.org.uk">https://ico.org.uk</a></li><li>• ThankQ - <a href="https://www.theaccessgroup.com/charity-crm/features/fundraising-donor-management/">https://www.theaccessgroup.com/charity-crm/features/fundraising-donor-management/</a></li><li>• Alumnet - <a href="https://alumnet.social/privacy">https://alumnet.social/privacy</a></li></ul>

Signed by: Bursar

On behalf of: ITSC

Date: 23/09/2020

## **How we use your information**

### **Introduction**

This notice explains how and why the Beyond Teddies Team at St Edward's School collects and uses personal data about you, when carrying out its fundraising activities, community relations and for development purposes.

This notice also outlines what we do with your information and what decisions you can make about your information in relation to fundraising and development.

The St Edward's Society is part of the School, and the School is responsible for how it uses your personal data. To use data protection terminology, the School is the "data controller" or "controller".

### **What is "personal data"?**

Personal data is information which is about you and from which you can be identified. This includes your contact details, your relationship with the School and financial information.

### **What personal data does the School hold about you and how is this obtained?**

We receive information about you from other teams within the School but only where this is relevant to our work. We obtain information from the School about the dates when you attended the School and which House you were a part of. We hold a specific database (ThankQ) with information about alumni, parents, staff, former parents, former staff and other supporters.

You provide us with information about yourself during the course of our relationship with you. For example, when you complete the Valet form when leaving the School or when you sign up to receive communications from us or order tickets for events.

In addition, we will obtain your information from other sources, which we use for the purposes described below. There are others who are involved in our development activities, for example, other members of your family and another alumni might tell us about your interests or your career.

We will hold information such as:

- your name, gender, marital status, roll number, and date of birth;
- information about your family, for example, whether you have any brothers or sisters who attended the School;
- any connection you may have with other members of the School community such as other alumni.
- Educational details such as the dates when you or your child attended the School and University (if applicable);
- if you are a former staff member the dates when you worked at the School;
- your contact details and professional details including employer and occupation;
- information about your achievements and interests e.g. which sports team you were part of as a pupil;
- photographs, including those we have taken (for example at events or to accompany a published interview);

- how you like to hear from us e.g. whether you have signed up to receive emails from us;
- your involvement with us. This includes correspondence with you, your attendance at our events, and whether you volunteer on one of our Committees;
- records of any donations and your Gift Aid status if applicable;
- information from articles in the media;
- any dietary requirements for catering purposes; and
- any disability which you may have so that we may make reasonable adjustments for you.

### **Why do we use your personal data?**

We use your information in the following ways:

- to keep you informed about events and activities and in relation to your attendance at those events (for example, so that we can accommodate you if you tell us about any special needs or dietary requirements);
- to facilitate interaction between members of the School community for example, we provide an online portal to allow alumni to communicate. More information can be found here: <https://alumnet.social/privacy>
- to tell you about products sold to benefit the School such as clothing and sports goods;
- to keep you informed about what is happening at the School, for example, by sending you publications such as a copy of the School alumni magazine called Rhubarb;
- in connection with providing financial support to the School (including making donations to the School, specific campaigns, such as to assist with bursarial support or new sports facilities);
- in connection with the other ways in which you might support the School (such as when you volunteer);
- in connection with any research we carry out. For example, we may ask you to complete a survey, provide feedback or join one of our committees.

We will contact you for the above purposes by email, telephone, social media, or post. If you do not want to be contacted for any of these purposes or in any particular way of communication mentioned above, please inform us.

We will use your personal data to build up a picture of your public philanthropic history and wealth so that we can tailor our fundraising requests appropriately. As part of this we may use your personal data to help us decide who might have capacity to make a donation to the School. We will use the following information for this purpose: your postal address, history of public philanthropy, public employment details and our assessment of how wealthy you are. We will also obtain information from sources outside of the School. These sources are as follows companies that assist us in our fundraising activities, Companies House, LinkedIn, company websites.

If you wish to make a donation, particularly a donation of a substantial value, we may need to verify your identity and / or carry out financial due diligence on you. This may involve taking and retaining copies of your identification documents and obtaining your personal data from the following sources: internet search engines, 192.com, the Charity Commission, Zoopla, Business Week and related media articles. This is to comply with our legal obligations.

We also collect and hold information about you derived from publicly available sources, including: LinkedIn, Twitter, Companies House and other business-related resources including company websites, the Queen's Honours lists, Royal Mail National Change of Address service, and reliable news and press reports.

We may take photographs or videos of you to use in our publicity or on our social media platforms and website.

### **How and why does the School share your personal data with third parties?**

- If you use a third-party platform to donate, then we will receive information about you from them;
- In accordance with our legal obligations, will share information with local authorities, such as the Independent Schools Inspectorate, Ofsted and the Department for Education, for example, where we have any safeguarding concerns;
- On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders;
- We may also need to share information with our professional advisors. For example, we may share your personal data with our legal advisers for the purpose of obtaining legal advice;
- We will need to share information if there is an emergency, for example, if you are hurt whilst on School premises or at one of our events;
- We will share information with HMRC in connection with Gift Aid claims; and
- We use contractors to help us with our work (e.g. a printing company for our literature) or where we store our database in the cloud.

### **Our lawful bases for using your information**

This section contains information about the lawful basis that we are relying on when handling your information.

- **Contract:** We will need to use your information in order to perform our obligations under a contract with you, for example, we need your name and contact details so that we can send you tickets for a concert that you have purchased tickets for.
- **Legitimate interests:** This means that we are using your information when this is necessary for our legitimate interests, except when your interests and fundamental rights override our legitimate interests. We rely on legitimate interests to use your information for all the purposes described except where we have asked you for your consent (in which case consent applies as the lawful bases). Specifically, we have a legitimate interest in:
  - ensuring that there is an active community of supporters which will benefit the School and members of the School community, such as current and former pupils and parents;
  - promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money for the bursary fund or new buildings;
  - using your personal data to administer our events;
  - safeguarding and promoting the welfare of our current and former pupils with whom you may be in contact e.g. if you arrange work experience or mentor a pupil; and
  - ensuring that we comply with our legal obligations.

If you object to us using your information where we are relying on our legitimate interests as explained above, please contact the Development Director.

- **Public task:** We rely on this basis (as well as legitimate interests) where we use personal data in order to look after those, we are responsible for. For example, if we needed to carry out checks on someone before allowing them to mentor our pupils.
- **Legal obligation:** On some occasions we will need your information to comply with a legal obligation. For example, we may need to keep a record of who is attending an event so that we can comply with our health and safety obligations.
- **Vital interests:** For example, to prevent someone from being seriously harmed or killed.
- **Consent:** In some cases, we are processing your personal data because you have given us your consent to do so. We may ask for your consent to use your data in certain ways for example, we will ask for consent before taking or using identifiable (named) photographs and videos. If we ask for your consent to use your personal data, you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. To withdraw or change your consent please contact the Development Director.

We do not rely on the contractual basis to use your personal data if we do not have a contract with you. For example, if you are a guardian or a parent not party to the contract with the School for your child's education.

The School must also comply with an additional condition where it processes certain types of more sensitive personal data. This applies to the following categories of information: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about criminal convictions or offences. We don't generally handle these types of personal data in relation to our fundraising and development activities, but we may do so occasionally. For example, we may need to use special category data in connection with your attendance at one of our events, e.g. to adjustments because of a disability you have or if you are hurt whilst taking part in an activity.

#### **Sending information to other countries**

In certain circumstances, we may send your information to countries which do not have the same level of protection for personal data as there is in the UK. For example, we may:

- store your information on cloud computer storage based overseas;
- sign up with organisations that are overseas to enhance the quality of our services.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

If the country that we are sending your information to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal data as there is in the UK.

Where appropriate we may put in place additional safeguards, for example, if we are using a third party to process a payment then we may ask them to contract with us using model data protection clauses provided by the European Commission in the absence of any other appropriate safeguard. If you would like more information about the safeguards that are in place, please contact the Development Director.

### **For how long do we keep your information?**

We have an ongoing relationship with you, and we would like you to be involved with the School for many years to come. For this reason, the Beyond Teddies Team keeps the majority of your personal data indefinitely. For example, we keep your contact details so that we can continue to stay in touch with you. Similarly, we will retain information about your involvement with the School as this helps us tailor our communications to you both now and in future.

We will also need to keep a record if you tell us that you do not want to hear from us anymore, so that we do not inadvertently add you to our mailing list in the future.

We also keep some information indefinitely for archiving purposes (this is known as "archiving in the public interest" under data protection law) and for historical research purposes. This includes the School's legitimate interest in research; supporting long-term accountability; enabling the discovery and availability of the School's and the wider school community's identity, memory, culture and history; enabling the establishment and maintenance of rights and obligations and of precedent decisions; educational purposes; and commercial and non-commercial re-use. For example, we keep some old photographs so that we have a record of what the School was like in the past. Information held in our archive may be made publicly available, but this would only be done in compliance with data protection laws.

The School will also keep information for a long time as part of its wider legal and regulatory obligations, even if that information is no longer needed for marketing, development or fundraising purposes. Although the Beyond Teddies Team keeps the majority of your personal data for a very long time, there are some exceptions to this.

For more information on how personal data is used by the School more widely and for a copy of the School's Data Retention Policy please contact the Data Protection and Compliance Manager at [datamanager@stedwardsoxford.org](mailto:datamanager@stedwardsoxford.org)

### **What decisions can you make about your information?**

Data protection legislation gives you a number of rights regarding your information. Your rights are as follows:

- **Correction:** if information the School holds about you is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request.
- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent or contract (please see "Our lawful basis for using your information" above); and (c) the information is being processed by us on computer.
- **Restriction:** you can request that we restrict how we use your personal data.
- **Object:** you may object to us using your information that is likely to cause, or is causing damage or distress, or for the purposes of direct marketing. You can also object to decisions being taken by automated means.

Please contact the Development Director to exercise any of your above rights if:

- you object to us using your information for marketing purposes e.g. to send you information about a regional networking event. We will stop using your information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential; or
- the lawful bases on which we are relying is legitimate interests. Please see the section "our lawful bases for using your information" above;
- if we ever use your information for scientific or historical research purposes or statistical purposes

This privacy notice does not, and is not intended to, give you any rights which you did not already have. For example, it does not give you any additional contractual rights.

You should inform the School of any changes to your personal data provided to the School, so it is held up-to-date and accurately. If you fail to provide certain information when requested, we may not be able to perform our obligations under the contract we have entered with you. We may also be prevented from complying with our legal obligations.

### **Audit, review and complaints**

To ensure compliance with the latest data protection legislation, the School will undertake periodic audits of systems and business processes to identify areas of non-compliance or improvement.

This policy will be reviewed periodically and updated in accordance with changes in legislation.

If you believe that the School has not complied with this notice or acted otherwise than in accordance with the data protection regulation, or believe a data breach has occurred, we would ask you to contact the School's Data Protection & Compliance Manager in the first instance. The School will take all steps possible to ensure that it is rectified or corrected. All notifiable breaches will be reported to the relevant supervisory authority within the necessary time frame and guidelines.

St Edward's School is registered as the Data Controller with the Information Commissioner's Office (ICO). If you believe that the School has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO). The ICO is the UK supervisory authority for data protection issues.

### **Further information and guidance**

The Development Director is the person responsible at our School for managing how we look after personal data and deciding how it is shared in relation to fundraising and development.

If you have any questions about this notice, its references or require further information, please contact the Development Director at [development@stedwardsoxford.org](mailto:development@stedwardsoxford.org) or you can contact the Beyond Teddies Team at [ose@stedwardsoxford.org](mailto:ose@stedwardsoxford.org), Beyond Teddies, St Edward's School, Woodstock Road, Oxford, OX2 7NN, on 01865 205319.

The Bursar has the overall responsibility for data protection within the School and is supported by the Data Protection & Compliance Manager, who has the delegated responsibility for overseeing the School's data practices are compliant with the relevant data protection legislation. You can contact the Data Protection & Compliance Manager at [datamanager@stedwardsoxford.org](mailto:datamanager@stedwardsoxford.org), Data Protection & Compliance Manager, St Edward's School, Woodstock Road, Oxford, OX2 7NN.