



**PREP
SCHOOLS
TRUST**

**Privacy Notice for Alumni,
Donors, and Supporters**

Date of last review:	October 2021	Review period:	1 year
Date of next review:	July 2022	Owner:	Data Compliance Lead

Privacy Notice – alumni, donors, supporters

1. Background and Introduction

Prep Schools Trust (“the Trust”) is proud of the many alumni who have attended and shaped its schools and who now make up its wider community. The Trust is also extremely grateful to school donors and supporters, a group made up of both alumni and those who are linked to the Trust’s schools in other ways. The Trust seeks to enable its schools to maintain and develop lifelong relationships with their alumni, donors and supporters.

The Trust is a charity, and it is committed to maintaining your trust and confidence in relation to your privacy. The overarching purpose of collecting and processing your data is to provide you with the best possible experience of being an alumnus, alumna, donor or supporter of one of the Trust’s schools. It also enables the Trust (and/or the Trust’s schools) to ensure that any approaches it may make to ask for your support – whether voluntary or financial - of their alumni relations or fundraising goals, are respectful and relevant to you.

The Trust will be transparent about the data it is collecting about you, where it comes from, how it uses the information and the rights you have in relation to the use of your data.

2. Who we are and what we do

Who we are

For the purposes of the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (UK GDPR), the Trust is the 'data controller' of data about alumni, donors and supporters. The data itself will be 'processed' by the Trust strictly in accordance with the DPA and UK GDPR.

This Notice is intended to be written on behalf of all the schools in the Trust i.e. Barfield, Chandlings Prep, Cothill House, Kitebrook Preparatory or Mowden Hall.

The postal address of the Trust is:

7 Cothill, Abingdon, Oxon, OX13 6JN

The Data Compliance Lead for the Trust is Jo Fitzroy-Ezzy. She can be contacted at the address set out above or as follows:

Email: datacompliance@prepschoolstrust.org Tel: 01865 390720

The Trust is also registered with the Fundraising Regulator, and where communications relate to fundraising will ensure that its schools comply with best practice and the Fundraising Promise (<https://www.fundraisingregulator.org.uk/code/fundraising-promise>).

What we do

Alumni relations and development activities exist at the schools within the Trust to develop lifelong relationships with and amongst alumni, donors and supporters. We would like to help you stay connected with each other and with the school’s news, events, reunions, volunteering opportunities, fundraising priorities and progress updates that are relevant to you.

We fundraise to ensure that through the generosity of our supporters, the schools continue to create the best educational environment within which our children can fulfil their potential and our superb teaching staff can continue to be creative and inspirational. Philanthropic support can be sought for bursaries, essential facilities or special projects and activities.

The information collected enables the Trust to undertake the activities described above.

3. How we collect information

The Trust collects information in the following ways: directly from you during your ongoing relationship with us; from publicly available sources (such as Companies House and LinkedIn); from third parties providing us with services or acting on our behalf (such as wealth screening companies). The amount of data collected and held depends on the frequency and nature of your interactions with us. Information may be gathered during the lifetime of our relationship with you.

When we collect personal information on our forms, we will make it clear whether there is a legal requirement for you to provide it, and whether there is a legal requirement on the Trust to collect it. If there is no legal requirement then we will explain why we need it and what the consequences are if it is not provided.

We will only hold information necessary to support the relationship appropriately and ensure that you have the best experience possible in your contact with us.

Categories of information we may hold and process include:

Biographical information, for example:

- Personal information such as your name, title, contact details, date of birth, marital status, partner and relevant family details.
- Characteristics information, such as gender, age.
- For past pupils, information relating to time at their school, for example dates of attendance, subject choices, involvement in sports, teams, clubs and societies.
- Employment information, including current employment and professional activities.
- Information about your relationship to relevant trusts or companies, e.g. membership on boards of trustees.
- Your interests, activities, and accolades.
- Public social media information, for example information held on LinkedIn.

Information about your interactions with us, for example:

- Your communication preferences (phone, email, post etc).
- Record of your communications with the school and the Trust.
- Record of your attendance at school or Trust events, including any payments made.
- Record of your connections with other alumni or staff.
- Record of any membership of school or Trust social media groups, e.g. Facebook or LinkedIn.
- Record of offers of support and of voluntary work you have undertaken for the school or Trust.

Gift information, for example:

- Current and past donations and pledges, and records of projects you have supported.
- Record of any current giving arrangements.
- Recognition requests, including any requests for anonymity in relation to your giving.
- Thank you letters and donor reports.

- Our understanding of your likely philanthropic interests either provided by you or from information in the public domain.
- Any financial information required to process your gifts .

Special Category personal data, for example:

- Health or dietary information, as provided by you to allow us to adjust the some of the services we provide. This information is more sensitive and requires a higher level of protection.

4. How we use your information

We process your personal data in support of the Trust’s alumni, donor and supporter relations and fundraising activity. The following are non-exhaustive examples of the way in which your information may be used.

Alumni relations:

- To offer a programme of alumni events relevant to your interests, including networking and reunion events, sports events, concerts and dinners.
- To keep you up to date with news about the school and school events.
- To provide you with information about alumni benefits and services.
- To let you know of volunteering opportunities at the school including mentoring and speaking opportunities.
- To ensure that we interact with you appropriately and offer relevant content when you are using our digital communications and platforms.

Philanthropy and donor care:

- To ensure that our fundraising efforts are efficient and cost-effective, and approaches for support are based, as far as possible, on an understanding of what may interest you.
- To invite you to support fundraising projects, at all times being mindful of fundraising best practice and the Fundraising Promise.
- To undertake all administration and activity relevant to processing, acknowledging and communicating the impact of any gift you may choose to make.
- To seek out potential supporters and assess feasibility of projects, we may use publicly available information and recommendations from others to determine those who might have an interest in making a gift to the school. Only relevant publicly available information may be added to your record. By doing this, the Trust can focus its conversations about fundraising and volunteering and ensure that you are provided with an experience as an alumnus/a, donor or supporter which is appropriate for you.
- We may also carry out due diligence on potential donors using only publicly available information in order to comply with our gift acceptance policy and to fulfil our legal responsibilities such as money laundering regulations.

External communications and internal reporting:

- With your permission, we may publish your name to recognise a gift, or work with you to create a copy to be included in publications or on the website (e.g. stories about alumni events and successes, or fundraising campaign updates and reports).
- We may use your personal data for operational reporting in order to evaluate progress and improve our services. We will only use the data required and reports will always be anonymised or pseudonymised where appropriate.

5. The legal basis / legal condition for processing your data

There are a number of legal bases for the processing of personal data. We will only use your personal data where the law allows us to do so. A brief explanation of the legal bases most likely to apply to the use of your data is set out below:

- **Consent:** where you have given clear consent for us to process your personal data for a specific purpose. In most cases, we will not need your consent to use your personal information. However, there are a few occasions where we either need it or choose to ask for it, for example, where we use your personal data for the purpose of direct marketing.
- **Legitimate interests:** where processing is necessary for our legitimate interests or the legitimate interests of a third party, unless your interests and rights override those interests. For example, where we need to process your personal data in order to offer a programme of alumni events relevant to your interests and to provide you with updates about the Trust.
- **Legal obligation:** where processing is necessary to fulfil a legal obligation.
- **Contract performance:** where processing is necessary to fulfil a contractual obligation.
- **Vital interests:** rarely, we may need to process personal data of our staff and workers to protect you or someone else's life. For example, to share information about medical conditions that you may have with a doctor or hospital in the event of an accident.

The following table provides a non-exhaustive list linking some of the ways in which your data may be used with the relevant legal basis:

Process	Legal basis			
	Alumni	Donors	Supporters (including volunteers)	Others (e.g. event guests)
Sending communications about School or Trust news and updates, event invitations, volunteering opportunities, and/or benefits and services	Legitimate interests	Legitimate interests	Legitimate interests	Legitimate interests
Maintenance of an alumni, former staff, donor, and supporter database, including your contact details, communication history and	Legitimate interests	Legitimate interests	Legitimate interests	N/A

preferences, and details of your career and interests				
Volunteering	Consent	Consent	Consent	N/A
Event ticketing paid	Consent and contract performance	Consent and contract performance	Consent and contract performance	Consent and contract performance
Event ticketing unpaid	Consent and contract performance	Consent and contract performance	Consent and contract performance	Consent and contract performance
Gift processing	N/A	Legitimate Interests and Legal Obligation	N/A	N/A
Claiming Gift Aid	N/A	Legitimate Interests and Legal Obligation	N/A	N/A
Data appending and cleaning	Legitimate interests	Legitimate interests	Legitimate interests	Legitimate interests
Use of data sources held elsewhere within the Trust	Legitimate interests	Legitimate interests	Legitimate interests	Legitimate interests
Data analysis	Legitimate interests	Legitimate interests	Legitimate interests	Legitimate interests
Fundraising*	Legitimate interests or consent	Legitimate interests or consent	Legitimate interests or consent	Legitimate interests or consent
Research into potential donors**	Legitimate interests or Consent	Legitimate interests or Consent	Legitimate interests or Consent	Legitimate interests or Consent
Management of volunteer committees	Legitimate interests or Consent	Legitimate interests or Consent	Legitimate interests or Consent	Legitimate interests or Consent

* Fundraising activities are undertaken by various communication channels, including post, telephone, email, and face-to-face contact. The Trust complies with the legislation applicable to each channel, alongside your own communications preferences, and will seek your consent to such communications where required.

** The Trust is of the view that research and processing of this type is within the reasonable expectations of alumni, donors, and supporters to whom we have provided a copy of this Privacy Notice and who have not objected to such processing.

The Trust will also need to process your special category personal data for the following legal reasons:

- explicit consent: rarely, we will process special categories of your personal data if you have given us your explicit consent but only where consent is appropriate;
- vital interests: rarely, we may need to process your personal data in order to protect someone's life. For example, to share information about medical conditions that you may have with a doctor or hospital in the event of an incident or accident;
- legal claims: we may need to process special categories of your personal data in connection with legal claims such as where a complaint or legal claim is brought against you or the Trust or in order to investigate allegations;
- other reasons: less commonly, we may need to process special categories of your personal data where you have already made this information public or for health or social care purposes (with a basis in law) or for public health purposes (with a basis in law) or for reasons of substantial public interest (with a basis in law).

6. Future changes

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose. Please note that we may process your data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

This Privacy Notice may be updated from time to time in order to reflect changes in the data that we process and how such data is processed. Where there has been a significant update we will ensure alumni, donors and supporters are notified of the change via our website and other communications channels.

The Trust maintains a *Record of Data Processing* activities. This can be requested from the Trust's Data Compliance Lead.

7. Do we share your information with third parties?

We will not share information about you with third parties without your consent unless the law allows us to. We do not and will not sell your data.

The Trust benefits from a network of individuals who offer their time and expertise to the Trust on a voluntary basis, for example by serving on school or Trust boards, or assisting with alumni or development projects. On occasion the Trust may share relevant data with these individuals under appropriate circumstances. Data will be shared securely and in line with relevant policies including the Trust's *Data Protection Policy*.

The Trust may need to share your data with third parties working on its behalf. In relation to third parties, we will only do this in appropriate circumstances, by secure means, and with the relevant data sharing agreements in place.

Third parties do not keep your data after the processing is complete. Third parties may include, but are not limited to: mailing houses, printers, organisations providing databases or alumni networking platforms, supporter market research, survey tools or payment services (e.g. direct debit, online donation processing) or other business-related support.

Occasionally we may need to transfer your personal data outside the UK, for example, some of our suppliers and service providers are located outside the UK and may see your personal information when providing us with software support, or a company which we use for carrying out surveys may handle your contact information on our behalf.

On the few occasions where we do transfer your information outside the UK, we will ensure it is protected and handled in line with data protection law. For example, we will only transfer it to a country that is officially considered to provide adequate protection for personal data or protect it by using one of the safeguarding measures available under data protection law.

8. How we protect your data

Alumni, former staff, donor, and supporter data is held securely on the Trust's administrative database, 'Isams' or on a CRM system.

Data is treated confidentially and sensitively and access is limited to those members of staff responsible for developing, delivering and implementing alumni, donor, and supporter programmes, who will process data in line with this Privacy Notice and the Trust's *Data Protection Policy* which can be requested from the Compliance Lead (see contact details above).

9. How long we keep your personal information

We only keep your information for as long as we need it or for as long as we are required by law to keep it.

When determining how long we should retain your personal data we take into consideration our legal obligations and tax or accounting rules, for example information we hold relating to gifts and donations will be retained in line with our legal obligations under HMRC and the Charity Commission.

When we no longer need to retain personal data, we ensure it is securely disposed of.

Full details are given in our *Records Retention Policy* which can be found on our website or requested from the Trust's Data Compliance Lead.

9. Automated decision making and profiling

Automated decision-making takes place when an electronic system (i.e. computer software) uses personal information to make decisions about a person without a human being involved. Profiling is a type of automated decision-making that involves collecting various pieces of information about a person in order to make

decisions or predictions about that person (for example, how that person may behave or what their preferences are). Automated decision-making does not have to involve profiling, though it often will.

We do not envisage that any decisions will be taken about you using automated decision making (including profiling). If that changes we will tell you.

10. Your rights

You have the right to:

- Ask for access to your personal information.
- Ask for rectification of the information we hold about you.
- Ask for the erasure of information about you.
- Ask for our processing of your personal information to be restricted.
- Data portability.
- Object to us processing your information.
- Withdraw your consent at any time to direct marketing or where processing is based on consent.

If you wish to exercise any of the above rights or at any time you are not happy with how we are processing your personal information then you may contact the Data Compliance Lead at the Prep Schools Trust:

Jo Fitzroy-Ezzy (Data Compliance Lead)
Director of Marketing and Communications
Prep Schools Trust
7 Cothill
Abingdon
Oxon OX13 6JN
Email – datacompliance@prepschoolstrust.org

If you remain unhappy with the outcome you can contact the Information Commissioner's Office.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.