



Emanuel School

## Privacy Notice for Alumni and Friends

### **Introduction**

Emanuel School takes its responsibilities for using personal information about individuals seriously. The school holds personal information for the purposes of managing the relationship between the school, former pupils and others in the alumni community.

Personal information is any information that identifies an individual and is related to them. Examples include contact details, next of kin and financial information. Information about religion or ethnic group, medical information, CCTV, photographs and video recordings are also considered personal information.

This policy is intended to provide information to alumni and friends about how the school will use (or "process") personal data about individuals. This information is provided in accordance with the rights of individuals under data protection law to understand how their data is used.

The person responsible for data protection and privacy at the school is the bursar. Day to day, the head of IT and compliance will deal with all your requests and enquiries concerning the school's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and data protection law. They can be contacted by email at [data.protection@emanuel.org.uk](mailto:data.protection@emanuel.org.uk), by post at Emanuel School, Battersea Rise, London SW11 1HS, or by telephone on 020 8870 4171.

This privacy notice applies alongside any other information the school may provide about a particular use of personal data, for example when collecting data via an online or paper form. This privacy notice also applies in addition to the school's other relevant policies, including the school's CCTV policy.

The school will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably possible.

### **What information the school will process and why**

The school and any relevant other organisation will use the contact details of alumni and other members of the school community to keep them updated about the activities of the school, or alumni events of interest, including by sending updates and newsletters, by email and by post.

Information which may be processed includes:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- career information
- bank details and other financial information, e.g. where events are paid for or donations made;
- correspondence with and concerning staff, pupils and parents past and present;
- images from alumni events, and images captured by the school's CCTV system; and
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin.



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The use of personal data will be made in accordance with the school's legitimate interests, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

The school expects that the following uses will also fall within that category of its "**legitimate interests**":

- Maintaining a record of those who were educated at Emanuel School.
- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests; including collecting information from publicly available sources about occupation and activities, in order to maximise the school's fundraising potential.
- To make use of photographic images in school publications, on the school website and (where appropriate) on the school's social media channels;
- To give and receive information and references about past pupils, including to any educational institution that it is proposed they attend; and to provide references to potential employers;
- For security purposes, including CCTV in accordance with the school's CCTV policy;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation purposes; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

Unless the relevant individual objects, the school will also:

- Share personal data about alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community;
- Contact alumni by post, email and phone in order to promote and raise funds for the school and, where appropriate, other worthy causes;

Should you wish to limit or object to any such use, or would like further information about how the school uses your personal information, please contact the school by email at [development@emanuel.org.uk](mailto:development@emanuel.org.uk) or [data.protection@emanuel.org.uk](mailto:data.protection@emanuel.org.uk); or by post to the school address. You always have the right to object to direct marketing or fundraising. However, the school is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

### ***How the school collects and processes your data***

Generally, the school receives personal data from the individual directly. This may be via a form, or simply in the ordinary course of interaction or communication such as email. However in some cases personal data may be supplied by third parties such as the Old Emanuel Association; or collected from publicly available resources.

Emanuel School's foundation, growth and success have been supported by philanthropy, and philanthropy continues to make an enormous impact at our school. To ensure that the



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school's communications are relevant to you and your interests and to assess your likely ability to make, and interest in making, donations to the school, it may use additional information such as geographical information and measures of affluence where available from external sources to assist.

The school wants to make sure it uses its resources as effectively as possible to help the school engage with its community of alumni and friends appropriately. In order to achieve this the school may undertake wealth screening of the alumni database. Wealth screening enables the school to better target conversations about fundraising and therefore generate funds cost-effectively. To achieve this the school may share your data with trusted third-party suppliers.

In order to provide you with the best experience and understand how the school could engage with you in the future, it undertakes analysis on the personal data it holds on you. This analysis helps the school to gain a better understanding of your interests, of how you engage with the school, and to understand broader demographic and geographic trends.

The school may also undertake research on your personal information to help make informed decisions. This may include research on demographic, philanthropic, business and financial information from publicly available sources, including social media. The school may also combine the data you provide with data obtained from other sources.

If you do not wish your data to be used in any of the ways listed above or have questions about this, you can contact the school at [development@emanuel.org.uk](mailto:development@emanuel.org.uk).

### ***Who has access to personal data and who the school shares it with***

For the most part, personal data collected by the school will remain within the school, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Where an individual is a member of the Old Emanuel Association, information may be shared with the association.

Some of the school's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions.

### ***How long the school keeps personal data***

The school will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Alumni information is kept for the duration of the relationship between the alumni and the school.

### ***Your rights***

Individuals have various rights under data protection law to access and understand personal data about them held by the school, and in some cases ask for it to be erased or amended or have it transferred to others, or for the school to stop processing it, but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is being used should contact the school at [data.protection@emanuel.org.uk](mailto:data.protection@emanuel.org.uk).

The school will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of



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requests for access to information. If the request is manifestly excessive or similar to previous requests, the school may ask you to reconsider or require a proportionate fee, but only where data protection law allows it.

You should be aware that the right of access is limited to your own personal data and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to legal privilege (for example legal advice given to or sought by the school, or documents prepared in connection with a legal action).

The school is also not required to disclose any confidential reference given or received by the school itself for the purposes of the education, training or employment of any individual.

### **Consent**

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Please be aware however that the school may have another lawful reason to process the personal data in question.

### **Data accuracy and security**

The school will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the development office by email to [development@emanuel.org.uk](mailto:development@emanuel.org.uk) of any significant changes to important information such as contact details held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under data protection law): please see above for details of why the school may need to process your data, or who you may contact if you disagree.

The school will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and governors will be made aware of this policy and their duties under data protection law and receive relevant training.

### **Queries and Complaints**

If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with data protection law, they should utilise the school complaints procedure notifying the bursar on [data.protection@emanuel.org.uk](mailto:data.protection@emanuel.org.uk). Anyone can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator.