

Privacy Notice for Alumni and Friends

Introduction

Emanuel School values the lifelong relationships it holds with its alumni and friends. The school holds personal information for the purposes of managing the relationship between the school, former pupils and others in the alumni community.

Emanuel School takes its responsibilities for using personal information about individuals seriously. This privacy notice is intended to provide information to alumni and friends about how the school collects, manages and uses ('process') their personal data. It also describes how an alumni/friend can change the ways in which the school uses their personal information at any time.

Emanuel School is registered as a data controller with the Information Commissioner Office (ICO) and is responsible under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 for the personal data they hold.

The person responsible for data protection and privacy at the school is the bursar. Day to day, the compliance manager 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, 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 notice should be read with any other policies mentioned within this privacy notice.

This notice does not form part of a contract to provide services and the school may update this notice at any time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably possible.

Data Protection Principles

Emanuel School will comply with the data protection principles when gathering and using personal information, as set out in the school's *Data Protection Policy*.

Personal data that we hold

Emanuel School may hold information relating to alumni from several sources. A significant proportion of the information the school holds has been provided by you directly (e.g. by filling in forms, or by responding to us by email/telephone or otherwise). As you were a pupil at Emanuel School, some of your personal data will have been transferred from your pupil/student record to the school's alumni database.

Information which may be processed includes but is not limited to:

- Contact and communications information, such as:
 - your contact details such as address, email address, phone numbers, social media links,
 - your communication preferences and consent forms,
 - records of communications and interactions we have had with you.
- Biographical information, such as:
 - your first name, last name, title, gender and date of birth,
 - your family and partner/spouse details,

- your professional activities and employment, including work contact details,
- information you have publicly shared on social media,
- your interests and extra-curricular activities.
- Financial information, such as:
 - your donation history, including gift amount, purpose, date, method of payment or other payment references,
 - tax status and Gift Aid declaration information,
 - bank details,
 - details of financial transactions, e.g. event tickets purchased,
 - assessment of your ability and willingness to make donations, including considerations of income and wealth.
- Relevant educational background and interaction with the school, such as:
 - historical records of your time in school, including records of your achievements and interests, photos and videos, where applicable,
 - your attendance at events,
 - records of meetings, conversations and correspondence,
 - interaction with emails we send,
 - your volunteering activity for the school including alumni volunteering.
- Other information, such as:
 - information required to manage your attendance at alumni events, including access arrangements and dietary requirements which may include health conditions;
 - images from alumni events, and images captured by the school's CCTV system.

Using your information

We collect and use your information to develop a full range of activities for and in relation to our pupils, parents, alumni, friends and supporters with the aim of fostering support for, and pride in, all that Emanuel School seeks to achieve. These include:

- providing you with information about relevant news, events and activities. This might include sending you publications, e-newsletters, invitations to events and details of volunteering opportunities.
- internal record keeping including maintaining a record of those who were educated at Emanuel School.
- furthering our charitable objectives, including to help us raise money or by asking you to donate money to Emanuel School.
- conducting surveys, focus groups and other research.
- providing services, including access to school facilities, email hosting for alumni and online accounts.
- administrative purposes, including the recording of donations you have made or events you have attended.
- transfer to HM Revenue and Customs in respect of any Gift Aid claims.
- 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, 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.
- 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.

- wealth screening, profiling and research. We do this so that our communications and fundraising approaches are informed by research carried out using publicly available data. We tailor our approaches to ensure that our fundraising strategy is appropriate and tailored to individuals and as far as it is possible, so that it will not cause offence. This approach will use a combination of publicly available information where available, such as geographical data and measures of affluence, information drawn from company resources and news media, with what you have provided us, such as past donations and career information. This enables us to better understand you as our supporter and ensure that our communications are relevant to you, your interests and to assess your likely ability and willingness to make donations to the school.

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 or 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*).

We will ensure that the ways in which we communicate with you, such as sending out school and alumni publications, inviting to events, advising you about our alumni benefits, fundraising priorities and voluntary giving, do not conflict with your chosen communication preferences.

We will use post, email, telephone and may also use social media messaging (e.g. LinkedIn) to keep in touch with the Emanuel School community. Digital tools may be used to monitor the impact of the school's communications, such as using email tracking to record when an email we send to you has been opened.

If you interact with the school through a third party (e.g. making a donation via a crowdfunding page) then we may obtain information about you from that third party, but only if you have given your explicit consent to that third party sharing your information.

The lawful basis on which we use this information

The school's primary condition for use of personal data is made in accordance with the school's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals. Our legitimate interests include promoting the charitable objects and interests of the school and its associated clubs, societies and associations.

If at any time it appears to us that we would like to use your personal data in a way which means that we would need your consent, then we will explain to you what we want to do and ask for your consent. If you give consent, you may change your mind at any time.

Protecting your data

The school is committed to protecting personal information. We take appropriate technical and organisational steps to ensure the security of personal data, including the use of technology and devices and access to school systems.

We store our data on school site servers or on servers and cloud storage based in the UK or within the European Union (EU). If a trusted partner/organisation has its servers outside the European Economic Area (EEA), we will take reasonable steps to ensure they provide an adequate level of protection. By submitting your personal information to us, you agree to this transfer, storing or processing at a location outside the EEA.

With whom we may share your information

For the most part, personal data collected by the school will remain within the school and will be accessed for relevant use only. Some of the school's processing activity is carried out on its behalf by third party organisations. These may include the following as required:

- suppliers and service providers (e.g. IT software systems, online payment systems, mailing services);
- support services (including insurance, IT support and information security);
- professional advisors such as lawyers and consultants.
- Relevant authorities (HMRC, police)

We may also use the services of external screening/profiling companies to help ensure that we make appropriate requests for support.

Information will be provided to those parties securely or anonymised where possible. The recipient of the information will be bound by confidentiality obligations, is required to respect the security of your data and to treat it in accordance with the law.

The school will never sell any of its data to third party organisations.

How long the school keeps your personal data

An alumnus (OE) is any former pupil of Emanuel School and some of their details will be kept on record for historical reference purposes in support of their lifelong relationship with Emanuel School or until they request us to do otherwise.

Where an alumnus exercises their right to erasure, we will continue to maintain a core set of personal data to ensure we do not contact them inadvertently in future and to maintain e.g. an educational record for archive purposes. We may also need to retain some financial records for statutory purposes (e.g. Gift Aid, anti-fraud and accounting matters).

Any changes we make to this privacy notice will be published on the school website and notify you by other communication channels where appropriate.

Your Rights (Access/Correction/Erasure/Restriction)

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 in writing at 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 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.

Where the school has been told of the passing of an alumnus (OE), it will be necessary for the school to verify the identity of the person informing the school following which the school will stop sending alumni related communications. Wishes to request data deletion/amendment ('right to erasure') will only be followed, if the identity is confirmed.

Right to Withdraw Consent

In the circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact data.protection@emanuel.org.uk. Once the school has received notification that you have withdrawn your consent, we will no longer process your information for the purposes you originally agreed to, unless we have another legitimate basis for doing so by law.

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. Please keep us informed if your personal information such as contact details change during your relationship with us by notifying the development office (development@emanuel.org.uk).

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 has put in place 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 you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance.

Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/>, although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator.

Contact

Bursar
Emanuel School
Battersea Rise
London
SW11 1HS

data.protection@emanuel.org.uk