



FRANCIS HOLLAND SCHOOLS TRUST

How We Use Your Information

Privacy Notice (Alumni, Friends & Supporters)

Francis Holland Schools Trust

April 2018

Introduction

This notice is to help you understand **how** and **why** we collect personal information about you and **what** we do with that information. It also explains the decisions that you can make about your own information.

Who We Are

The Francis Holland (Church of England) Schools Trust, also herein referred to as “the School” or “the Trust”. Our registered address is 35 Bourne Street, London SW1W 8JA.

Data Protection Contact Details

If you have any questions about this notice please contact:

The Data Protection Coordinator
Francis Holland Schools Trust
35 Bourne Street, London SW1W 8JA

Email: dpc@fhst.org.uk

What is personal information?

Personal information is information that identifies you as an individual and relates to you. This includes your contact details. We may also hold information such as your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

How and why does the Trust collect and use personal information?

The Marketing and Development Offices are departments of the Trust that have responsibility for alumni relations, events, and fundraising and charitable giving to our schools. The Offices work in accordance with the Trust’s Data Protection Policy and relevant legal regulations such as the General Data Protection Regulation (GDPR) and the Data Protection Act 1998. We set out below examples of the different ways in which we use personal information and where this personal information comes from. Any personal data is stored securely, with access restricted to authorised staff only. Most information that we hold will have been obtained directly from you, from your original school admissions form and, in some cases, from publicly available sources.

Personal data held and processed by the Marketing and Development Offices may include:

- Biographical information including your name and date of birth
- Your contact details and communication preferences
- Your education history
- Your clubs and societies affiliations and your other connections with the school

- Your professional activities and employment
- Your interests and extra-curricular activities
- Information you have publicly shared on social media
- Your volunteering activity for the school including alumni volunteering
- Your family and partner/spousal details
- Your relationships with other alumni, donors and friends
- Your donation history and wealth assessment information
- Records of communications and interactions we have had with you
- Your attendance at school events

Please note that we do not collect or store any credit/debit card details.

This data is used by the Trust to support a full range of activities for our alumni and friends and to ensure that the ways in which we communicate with you, such as sending out school publications, inviting you to events, or advising you about our alumni benefits and fundraising priorities, are relevant and adhere to your chosen communication preferences.

Here are some further examples of how we may use your personal data:

- General administration (e.g. event management, processing of donations, internal record keeping);
- Seeking non-financial support (e.g. careers advice to students, sharing of expertise);
- From time to time to create a profile of your interests, preferences and level of potential donations so that we can contact you in the most appropriate way and with the most relevant information;
- Enable alumni representatives to discharge their duties as volunteer helpers under the Marketing and Development Offices umbrella.
- We may use information about you if we need this for historical research purposes or for statistical purposes.
- We may need information about any court orders or criminal petitions which relate to you. This is so that we can safeguard the reputation of the school or the welfare of any current students with whom you may come into contact during school or alumni events.
- We use CCTV to make sure the school site is safe. CCTV is not used in private areas such as toilets.
- We may take photographs or videos of you at events to use on social media and on the school websites to help promote the school. If you have any concerns about the use of photographs and videos please contact the Marketing Office.

Sharing personal information with third parties

Occasionally we may use consultants, experts and other advisors to assist the Trust in fulfilling its obligations and to help run our alumni services properly. We might need to share your information with them if this is relevant to their work but will ensure appropriate data-sharing agreements are in place before doing so.

Other instances in which we may share your data include:

- In accordance with our legal obligations, we may need to share information with the police.
- We may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- We may share some information with our insurance company, for example, where there is a serious incident involving you on school premises.
- We may also need to share information if there is an emergency, for example, if you are hurt whilst on school premises.

Our legal grounds for using your information

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

Legitimate interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to you. The Trust relies on legitimate interests for most of the ways in which it uses your information.

Specifically, the Trust has a legitimate interest in:

- Promoting the objects and interests of the School through its alumni services, including fundraising;
- Facilitating the efficient operation of the Trust; and
- Ensuring that all relevant legal obligations of the Trust are complied with.

If you object to us using your information where we are relying on our legitimate interests as explained above please speak to the Data Protection Coordinator.

Necessary for a contract

Once you have joined the alumni body, we will need to use your information in order to perform our obligations under our contract with you. For example, we need your name and contact details so that we can keep you updated on alumni events and what is happening at the school.

Legal obligation

Where the Trust needs to use your information in order to comply with a legal obligation, for example to report a matter to the courts, the local authority or the police where legally obliged to do so.

Vital interests

For example, to prevent someone from being seriously harmed or killed.

Public interest

The Trust considers that it is acting in the public interest when providing education.

Additional conditions

The Trust must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

Substantial public interest

The processing is necessary for reasons of substantial public interest.

Vital interests

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Legal claims

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

Medical purposes

This includes medical treatment and the management of healthcare services.

We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please contact the School if you would like to withdraw any consent given.

Sending information to other countries

In storing personal data overseas, we will abide by European Commission regulations which state that personal data must not be stored outside the EEA unless the relevant country has an adequate

level of data protection. The Commission has produced a list of countries which have adequate data protection rules. The list can be found here:

http://ec.europa.eu/justice/data-protection/internationaltransfers/adequacy/index_en.htm

We may also send your information to other countries where we communicate with you when you are overseas (for example, during the summer holidays if you live in a different country).

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 information as there is the UK.

What decisions can you make about your information?

You have the following rights, which you can exercise by contacting us:

- If information is incorrect you can ask us to correct it;
- You can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to;
- 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;
- You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer;
- Our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

If you request that we stop processing your data, we will remove personal data with the following exceptions:

- Your name and years of entry and leaving alongside your request to remove your data. We will retain this information to prevent you from being inadvertently contacted in the future.
- Information needed to comply with statutory requirements, but only for as long as those statutory requirements specify (e.g. Gift Aid declarations)
- A coded reference may be attributed to you for reporting and accounting purposes concerning any events attended or donations made.

The Data Protection Coordinator can give you more information about your data protection rights.

Further information and guidance

The Data Protection Coordinator is the person responsible at the Trust for managing how we look after personal information and deciding how it is shared.

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

This notice is to explain how we use your personal information. Please contact the School if:

- You object to us using your information for marketing purposes e.g. the use of images. We will stop using your information for in this way 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.

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office (ico.org.uk).