

## **How We Use Your Information** ***Privacy Notice (Alumni, Friends & Supporters)***

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**Francis Holland Schools Trust**

September 2022

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## Introduction

Our alumni and supporters are extremely important to us, and this Privacy Notice is to help you understand **how** and **why** we collect personal information about you and **what** we do with that information. It outlines the types of information that we hold and how we use it to provide services to our alumni and supporters. It also explains the decisions that you can make about your own information. We aim to be clear when we collect your personal information, and not do anything you would not reasonably expect.

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## 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.

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. We do this by offering a range of academic, social and networking events and publications. We also fundraise to support our schools’ students, teaching, research and capital projects. The Marketing and Development Offices work in accordance with the Trust’s Data Protection Policy and relevant legal regulations such as the General Data protection regulation (UK GDPR) and the Data Protection Act 2018.

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## 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.

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## How and why do we collect personal information?

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. This data is collected by the school during the course of our relationship with students, alumni, donors and supporters. Initially, personal information about students is transferred into our database from our MIS, in accordance with the Student Privacy Notice.

The vast majority of the information we hold is obtained directly from you; and if you interact with any other departments or schools within the Trust, we may receive data from those areas. Similarly, we may receive information from recognised school volunteer groups (e.g. parent associations), clubs or societies, subject to their privacy notices. We may also obtain information from third parties we partner with, subject to those third parties’ own privacy practices. We always aim to keep your details

up to date, and we will conduct projects to check the contact details we have for you are correct, and, where appropriate, update them.

As a result, some of the data may also have been obtained from publicly available sources – for example, we may find a new address for you by using the Royal Mail's National Change of Address database (NCOA). We may also use information from publicly available sources to carry out research to assess your inclination and capacity to support the Trust financially or by volunteering your time. More information on these activities, and the legal bases on which we process your data in pursuit of these activities, is below and you will always have the right to opt out of any or all forms of data processing. We value our relationship with you and we use your personal information to ensure we contact you in the most appropriate way, improve our services and to ensure we work efficiently and effectively.

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. We are fully PCI-DSS compliant. Bank details used for processing Direct Debits are stored by a trusted third-party, under the Direct Debit Guarantee scheme.

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## **How do we use your personal information?**

The data we hold 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.

Unless you have requested otherwise, personal information held about you is accessible to the Trust, its schools and faculties, alumni associations, groups and networks (included selected

volunteers), alumni volunteers, and sports and other clubs associated with the Trust and may be used to pursue and support a full range of mutually beneficial alumni and supporter engagement and fundraising activities, where these do not override your fundamental rights and freedoms as a data subject. All external entities with whom personal information is shared and to whom we are not legally bound must sign a contract and/or a confidentiality and non-disclosure agreement which governs their use of the personal information before any transfer of personal information takes place.

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 our schools. If you have any concerns about the use of photographs and videos please contact the Marketing and Development Offices.

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## **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. Personal information will only be kept by the third party for as long as it is required to fulfil its obligation to the Trust, and will then be destroyed.

If you interact with the Trust through a third party (for example, supporting the Trust via JustGiving or a crowdfunding page, Eventbrite, or through a recognised Trust volunteer or group) then we may obtain information about you from that third party. The receipt of personal information in this manner is subject to the third party's own privacy policy or the information they have provided to

the data subject. Information obtained in this way is treated no differently to any other once held by us, and is bound by the terms of this Privacy Notice as soon as it is received.

From time to time we may work in partnership with other charitable organisations contractually bound to the Trust on joint fundraising initiatives, and we may – in limited circumstances – share your name and information about the nature of your relationship with the Trust (e.g. the fact that you are an existing donor) with those organisations. We do this solely to ensure that you are contacted for these joint initiatives only by the most appropriate partner. In such cases all parties are bound by a contractual agreement governing the types and uses of the shared data and will not be permitted to retain the data nor use it for any other purpose (for example, fundraising beyond the joint project). Please note that these ‘partnership approaches’ encompass a very small number of individuals who are likely to make major philanthropic gifts to the specific charitable area the Trust is working in partnership to support.

We may use information we hold on you to tailor social media offerings related to the Trust activities listed above. This means that you might see targeted content from us on social media channels where you have an account. We do this to try to ensure we are providing you with content that is most appropriate for you or may be of most interest to you. If you would prefer we did not tailor our messaging and content to you in a targeted way on social media please let us know. Please note this may still mean you receive and/or see content about the Trust on social media channels, though it may not be tailored by us.

Tools may be used to help us improve the effectiveness of the Trust’s communications with you, including tracking whether the emails we send are opened and which links are clicked within a message. We also monitor website visits and use tools such as Google Analytics to improve our website and services.

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 Trust premises.
- We may also need to share information if there is an emergency, for example, if you are hurt whilst on Trust premises.

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## **Our legal grounds for using your information**

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

As part of our work we process and store personal information relating to students, staff, alumni, current and potential supporters and friends of the Trust and we therefore adhere to all relevant UK data protection legislation. We take our data protection responsibilities seriously and ensure the personal information we obtain is held, used, transferred and processed in accordance with all applicable laws. When laws are updated, revised or replaced we will review our data processing practices as required by and in line with the most up-to-date UK legislation.

### **Legitimate interests**

This means that the processing is necessary for legitimate interests except where the processing is unfair to you.

There is no requirement under EU or UK legislation for the Trust to conduct alumni and supporter relations or fundraising, and we therefore rely on our legitimate interest as our legal basis for data processing for these activities wherever appropriate and possible. This is because alumni and supporter relations and fundraising:

- is of clear benefit to the Trust and those who we can support because of this activity – through teaching, research and in society more broadly;
- has a limited impact on the privacy of students, alumni, staff and current and potential supporters, whose interests do not override our legitimate interests and the wider public interest;
- is reasonably expected by our students, alumni, staff and current and potential supporters, who we do not wish to bother with disruptive consent requests when they are unlikely to object to processing.

We process the information outlined in this Privacy Notice in pursuit of our legitimate interests in:

- communicating with students, staff, alumni, and current and potential supporters;
- providing benefits, services and offers to students, staff, alumni and supporters;
- furthering the Trust's educational charitable mission (which includes fundraising and securing the support of volunteers);
- enabling the Trust to achieve its strategic and operational goals.

We may pursue these legitimate interests by contacting you by telephone, email, post or social media, subject to your communications preferences. Information about how you can manage the ways that we contact you, including how to opt out from some or all contact from us, is outlined in the 'Your rights' section below.

Whilst we rely on legitimate interest as the legal basis for processing where this is appropriate and possible we recognise that it is not the only lawful ground for processing personal information. As such, where appropriate we will sometimes process your personal information using an alternative legal basis. For example if you are not a student or graduate but you fundraise or donate to the Trust via a crowdfunding platform such as JustGiving we may contact you with future opportunities to get involved only if you agree we may do so.

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. If you would like to withdraw any consent given, or 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.

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**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](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.

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**Your rights: What decisions can you make about your information?**

We will always try to ensure that the personal information we hold for you is up-to-date, reasonable and not excessive. You will always have the right to:

- Be informed as to how we use your personal information (via this Privacy Notice);
- Access or request a copy of the data we hold about you;
- Update, amend or rectify the personal information we hold about you
- Change your communication preferences at any time to restrict how we process your personal information, or opt out of some or all communication from us;
- Ask us to remove your personal information from our records. Please note that in such instances we must retain a 'skeleton record' for you to ensure we do not contact you again. There may also be data which we are legally obliged to keep;
- Withdraw consent, where it is used as a legal basis for processing;
- Object to or restrict the processing of your personal information for any of the purposes outlined above.

Please note that in some instances we may be required to contact you outside your preferences because we are legally obliged to do so (for example, to provide a Direct Debit Guarantee and/or Gift Aid confirmation) or in response to an action you have taken (for example, to post you a gift thank you letter and receipt, or tickets to an event you have registered for). Beyond any legal obligation or action in response to a positive action by you, your contact preferences will always stand until you inform us otherwise.



Please also note that as a student or graduate if you opt out of an activity through a platform hosted by a third party we are partnering with to deliver a service your preferences as collected on that platform may only relate to the activity that platform facilitates. For example, if you are a student or graduate and you opt out of the Trust keeping you informed by email whilst fundraising through JustGiving this will mean you do not receive future emails about crowdfunding opportunities, crowdfunding events, or stewardship related to crowdfunding. Any opt-in or opt-outs to or from our updates via Eventbrite only affect communications we may send via Eventbrite. If you opt out of our email communications via Mailchimp please note that this applies to our 'one to many' communications only, and we may still contact you by email 'one to one' (e.g. direct contact from a staff member about something specific to you personally). You also have the right to opt out of 'one to one' communications by contacting us directly. We will always make it as clear as possible what you are opting out of to ensure you can make the most appropriate personal choices.

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

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## **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.

### **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](mailto:dpc@fhst.org.uk)

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 us 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](https://ico.org.uk)).

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## **Future changes**

From time to time, we may use your information for new purposes not currently described in this Privacy Notice. If our information practices or the appropriate legislation changes at some point in the future we will always indicate the policy changes in this document.