



Old Godolphin Association

Privacy Notice

September 2018



Introduction

1. This notice explains **how** and **why** we collect personal information about you when carrying out our activities for the benefit of former pupils and staff at Godolphin School (the School) and outlines **what we do** with your information. It also explains what **decisions** you can make about your own information.
2. The Association is a separate entity from the School and is the joint controller with the School of your personal information in so far as it relates to the Association's activities but not otherwise.
3. If you have any questions about this notice or your data protection rights, please contact the School's Privacy Officer on behalf of the Association, whose contact details are set out at the end of this notice.

What is "personal information"?

4. Personal information is information that identifies you as an individual and relates to you. This includes your name, contact details, your connection with the School and details of your further education and career.

What personal information does the Association hold about you and how is this obtained?

5. We receive information about you from the School and you also provide us with information about yourself during the course of our relationship with you.
6. We may obtain information about you from other sources in the public domain, such as LinkedIn, Facebook, Twitter and wealth-screening sources, and from media articles.
7. We may hold information such as:
 - 7.1. Your name and contact details;
 - 7.2. If applicable, the dates when you attended the School;
 - 7.3. If you are a former staff member, the dates when you worked at the School;
 - 7.4. If you are a former pupil, information about your achievements and interests as a pupil;
 - 7.5. Where you attended university and your occupation;
 - 7.6. How you like to hear from us e.g. whether you have signed up to receive emails from us;
 - 7.7. Your involvement with us e.g. if you participate in the organisation and activities of the Association, including volunteering and fundraising;
 - 7.8. Information about you from articles in the media and from other public sources;
 - 7.9. For catering purposes, any dietary requirements that you have provided; and
 - 7.10. Details of any disability which you may have, so that we may make reasonable adjustments for you.

Why does the Association use your personal information?

8. We use your information in the following ways:
 - 8.1. To facilitate contact between members of the Association, including use of the School's online portal which allows alumnae to communicate. This can be found here: <http://godolphincommunity.org/>
 - 8.2. To keep you informed about events and activities organised by the Association or the School, such as reunions, concerts, plays and lectures, and in relation to your attendance at those events;
 - 8.3. In connection with ways in which you might participate in the organisation and the activities of the Association, including volunteering and fundraising; and
 - 8.4. In connection with your providing financial support to the School, including making donations to the School, specific fundraising campaigns and requests for sponsorship.
9. We may contact you for any of the above purposes by email, post, telephone or text message but will only do this where we are allowed to do so under data protection law. For example, we will usually need your consent before sending you an email about a fundraising opportunity. If you tell us that you do not want to be contacted for any of these purposes, then we will, of course, respect that.
10. We may take photographs or videos of you to use in our publicity or on our social media platforms and website.

How and why does the Association share your personal information with third parties?

11. We will not share your personal information with any third party other than as specified in this notice or as required by law.
12. We may share information about you with other members of the Association and with the School.
13. On occasion we may need to share information about you with the police for the prevention and investigation of crime and the prosecution of offenders.
14. We may need to share information about you with our legal advisers for the purpose of obtaining legal advice.
15. If you attend one of our events, we may share your information with event booking platforms or joint hosts if applicable.
16. We may need to share information about you if there is an emergency, e.g. if you are hurt whilst at one of our events.
17. **We may need to share information about you with the external contractors we use to help us with our work, e.g. a printing company for our literature or where we store our database in the cloud.**

Our legal bases for using your information

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

Legitimate interests

19. In many cases, processing your personal information is necessary for the Association's legitimate interests, except where your interests and fundamental rights override those legitimate interests.

20. Specifically, we have a legitimate interest in:

- 20.1. Ensuring that there is an active membership within the Association;
- 20.2. Promoting the objects and interests of the Association, including fundraising;
- 20.3. Using your personal information to administer our events; and
- 20.4. Ensuring that we comply with our legal obligations.

21. If you object to us using your information where we are relying on our legitimate interests as explained above, please speak to the School's Privacy Officer on behalf of the Association.

Consent

22. In some cases, we are processing your personal information because you have given us your consent to do so.

23. If we ask for your consent to use your personal information you can withdraw this consent at any time. Any use of your information before you withdraw your consent remains valid. To withdraw your consent please contact the School's Privacy Officer on behalf of the Association.

Necessary for a contract with you

24. We may need to use your information in order to perform our obligations under a contract with you. For example, we need your name and contact details so that we can send you tickets for an event that you want to attend.

Legal obligation

25. On some occasions we may need your information to comply with a legal obligation. For example, we may need to keep a record of who is attending an event, so that we can comply with our health and safety obligations.

Vital interests

26. We may need to use your information to protect a vital interest, e.g. to prevent death or serious injury.



Special categories of information

27. The Association is also required to comply with an additional condition where it processes special categories of personal information, namely information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic information, biometric information, health information and information about sex life or orientation. The Association's grounds for processing information of this nature will depend on the circumstances but may include the following:

27.1. To protect the vital interests of any person where that person cannot give consent, e.g. if they are seriously hurt or are unconscious; or

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

Criminal offence information

28. We may only use information relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations or exercise our rights.

More than one basis

29. In some cases, we will rely on more than one basis for a particular use of your information. In addition, we may move from one legal basis to another as circumstances change.

Sending your information to other countries

30. We will not send your information to other countries which do not have the same level of protection for personal information as there is in the UK or the EU, unless you ask us to communicate with you overseas, e.g. when you are on holiday or live overseas, or otherwise give your specific consent.

For how long do we keep your information?

31. We will keep information about you only for as long as we need to do so, in compliance with our data protection and other legal obligations. For example, we will need to retain contact details for you for so long as you want to be part of the Association, so that we can communicate with you.

32. We may also need to keep a record if you tell us that you do not want to hear from us anymore, so that we do not inadvertently add you to our mailing list in the future.

33. We may also keep information about you for a long time or even indefinitely if we need this for historical, research or statistical purposes.

What decisions can you make about your information?

34. You have a number of additional rights regarding your personal information, some of which are new rights whilst others build on your existing rights. These rights are as follows:



- 34.1. **Rectification:** if information we hold about you is incorrect you can ask us to correct it;
- 34.2. **Access:** you can 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;
- 34.3. **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances, e.g. where we no longer need the information;
- 34.4. **Portability:** in certain circumstances, you can request the transfer of your information to you or a third party in a format that can be read by a computer;
- 34.5. **Restriction:** 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; and
- 34.6. **Objection:** you may object to us using your information where (a) we are using it for direct marketing purposes, (b) the basis on which we are relying is legitimate interests (c) we are using it for historical or scientific research or archiving purposes.

Further information and guidance

35. The School's Privacy Officer is the person responsible on behalf of the Association for managing how we look after personal information and deciding how it is shared.
36. Like other organisations we need to keep your information safe and 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.
37. Please speak to the School's Privacy officer if:
 - 37.1. You object to us using your information for any purpose. We will stop doing so if you tell us not to; or
 - 37.2. You would like us to update the information we hold about you; or
 - 37.3. You would prefer that certain information is kept confidential.
38. 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).
39. The Privacy Officer's contact details are:

Godolphin School
Milford Hill
Salisbury
SP1 2RA

Email: privacy@godolphin.org
Tel: 01722 430500