



Godolphin School

Privacy Notice for Support and Development

September 2018



Introduction

1. This notice explains **how** and **why** we collect personal information about you when carrying out our support and development activities and outlines **what we do** with your information. It also explains what **decisions** you can make about your own information.
2. If you have any questions about this notice or your data protection rights in relation to support and development, please contact the Privacy Officer, whose contact details are set out at the end of this notice.
3. The School works in close conjunction with The Godolphin Foundation (registered charity no 1168399) in respect of its fundraising and development activities. The Godolphin Foundation is a separate entity set up to provide financial and other support to the School. The administration of the Foundation is provided through the School and this notice also covers how The Godolphin Foundation uses your personal information.
4. This notice relates only to how the School uses your personal information for support and development purposes. For more information about how we use your information more widely (for example, in relation to the provision of education) please refer to the appropriate privacy notices (including for parents and older and younger pupils) published on the School's website (www.godolphin.org).

What is “personal information”?

5. Personal information is information that identifies you as an individual and relates to you. This includes your name, contact details, your relationship with the School and financial information relating to you.

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

6. You provide us with information about yourself during the course of our relationship with you.
7. We may also obtain information about you from other sources in the public domain, such as LinkedIn, Facebook, Twitter and wealth-screening sources, and from media articles.
8. We may hold information such as:
 - 8.1. your name and contact details;
 - 8.2. if applicable, the dates when you or your daughter attended the School;
 - 8.3. if you are a former staff member, the dates when you worked at the School;
 - 8.4. if you are a former pupil, information about your achievements and interests as a pupil;
 - 8.5. where you attended university and your occupation;
 - 8.6. how you like to hear from us e.g. whether you have signed up to receive emails from us;
 - 8.7. your involvement with us e.g. if you carry out any volunteering on behalf of the School;
 - 8.8. records of any donations made by you and your Gift Aid status if applicable;

- 8.9. for catering purposes, any dietary requirements that you have provided and
- 8.10. details of any disability which you may have, so that we may make reasonable adjustments for you.

Why do we use your personal information?

- 9. We use your information in the following ways:
 - 9.1. to keep you informed about events and activities at the School, such as concerts, plays and lectures, and in relation to your attendance at those events;
 - 9.2. to keep you informed about what is happening at the School;
 - 9.3. in connection with ways in which you might support the School, such as volunteering;
 - 9.4. in connection with your providing financial support to the School, including making donations to the School, specific fundraising campaigns and requests for sponsorship; and
 - 9.5. to facilitate interaction between members of the School community, such as the School's online portal which allows alumnae to communicate. This can be found here: <http://godolphincommunity.org/>
- 10. We will 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.
- 11. We may have to verify your identity and/or carry out financial due diligence in relation to you, in order to comply with our legal obligations. This may involve taking and retaining copies of your identification documents and obtaining your personal information from publicly available sources such as Google, Companies House, the Charity Commission and media articles. We may also ask for your consent to obtaining information from other third party sources which are not publicly available.
- 12. We may take photographs or videos of you to use in our publicity or on our social media platforms and website. If we consider that the photograph or video is more privacy intrusive we may ask for your consent first.

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

- 13. We will not share your personal information with any third party other than as specified in this notice or as required by law.
- 14. If required by our legal obligations, we will share your information with local authorities, the Independent Schools Inspectorate and the Department for Education, e.g. if we have any safeguarding concerns.
- 15. 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.

16. We may need to share information about you with our legal advisers for the purpose of obtaining legal advice.
17. If you attend one of our events, we may share your information with event booking platforms or joint hosts if applicable.
18. We may need to share information about you if there is an emergency, e.g. if you are hurt whilst on School premises or at one of our events.
19. We use external contractors to help us with our work, e.g. a printing company for our literature, or where we store our database in the cloud.
20. We may share information about you with the Old Godolphin Association and The Godolphin Foundation.

Our legal bases for using your information

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

Legitimate interests

22. In most cases, the School is using your personal information when this is necessary for the School's legitimate interests, except where your interests and fundamental rights override those legitimate interests.
23. Specifically, we have a legitimate interest in:
 - 23.1. ensuring that there is an active community of supporters which will benefit the School and members of the School community, such as current and former pupils and parents;
 - 23.2. promoting the objects and interests of the School. This includes fundraising, e.g. if we want to raise money for new buildings or a bursary fund;
 - 23.3. using your personal information to administer our events;
 - 23.4. safeguarding and promoting the welfare of our pupils with whom you may be in contact, e.g. if you arrange work experience or mentor a pupil; and
 - 23.5. ensuring that we comply with our legal obligations.
24. If you object to us using your information where we are relying on our legitimate interests as explained above, please speak to the Privacy Officer.

Consent

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

Necessary for a contract with you

27. We will 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

28. On some occasions we will 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

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

Special categories of information

30. The School is also required to comply with an additional condition where it processes special categories of personal information, namely 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. The School's bases for processing information of this nature will depend on the circumstances but may include the following:

- 30.1. 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
- 30.2. 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

31. 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. Less commonly we may use information relating to criminal convictions and offences where it is necessary in relation to legal claims, where it is necessary to protect pupils and you are not capable of giving your consent, or where you have already made the information public.

More than one basis

32. 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

33. 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?

34. 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 School community, so that we can communicate with you.
35. We will 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.
36. We may keep information about you for a long time or even indefinitely if we need this for historical, research or statistical purposes.
37. We may also keep information for a long time as part of our wider legal and regulatory obligations, even if that information is no longer needed for support and development purposes. This is especially relevant to former staff, pupils and parents. For more information on how personal information is used by the School more widely, please contact the Privacy Officer.

What decisions can you make about your information?

38. 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:
- a. **Rectification:** if information the School holds about you is incorrect you can ask us to correct it;
 - b. **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;
 - c. **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;
 - d. **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;
 - e. **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
 - f. **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

39. The Privacy Officer is the person responsible at the School for managing how we look after personal information processed in relation to support and development and deciding how it is shared.

40. 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.
41. Please speak to the Privacy Officer if:
- a. You object to us using your information for support and development purposes. We will stop doing so if you tell us not to; or
 - b. You would like us to update the information we hold about you; or
 - c. You would prefer that certain information is kept confidential.
42. 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).
43. The contact details for the Privacy Officer are:

Godolphin School
Milford Hill
Salisbury
SP1 2RA

Email: privacy@godolphin.org
Tel: 01722 430500