

**PRIVACY NOTICE FOR  
THE OLD GODOLPHIN ASSOCIATION**

Last reviewed:	July 2022
Next review: month/year	September 2023
Reviewed by:	Head of Marketing and Alumnae, Senior Deputy Head

## **1 Introduction**

We take your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information on who we are, how and why we collect, store, use and share ("process") personal information, your rights in relation to your personal information and how to contact us and supervisory authorities in the event you have a complaint.

## **2 What is personal information?**

Personal information is information that identifies you as an individual and relates to you, for example, your name, contact details, connection with Godolphin (the School) and details of your further education and career.

## **3 Who we are**

**3.1** Godolphin ("the School") is an independent school and a registered charity (number 309488) located at Milford Hill, Salisbury, Wiltshire, SP1 2RA. The School is administered by its corporate trustee, The Godolphin School Trustee Limited (company number 08527491), of the same address.

**3.2** When the Old Godolphin Association (OGA) processes personal information for these objectives, we do so as joint controllers of that information with the School and subject to a data sharing agreement with the School and to applicable data protection laws. Further information about the data sharing agreement is available from our Privacy Officer whose contact information is given at the end of this notice.

## **4 The personal information we collect and use**

**4.1** 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. 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.

**4.1.1** The personal information which we may process includes:

**4.1.2** Your name and contact details;

**4.1.3** The dates when you attended the School;

**4.1.4** If you are a former staff member, the dates when you worked at the School and your role(s) at the School;

**4.1.5** If you are a former pupil, information about your achievements and interests;

**4.1.6** Where you attended university and your occupation;

- 4.1.7 How you like to hear from us, for example, whether you have signed up to receive emails from us;
- 4.1.8 Your involvement with us, for example, whether you participate in the organisation and activities of the OGA, including volunteering and fundraising;
- 4.1.9 Information about you from articles in the media and from other public sources;
- 4.1.10 Any dietary requirements that you provide and details of any disability which you may have;
- 4.1.11 CCTV images of you taken on the School premises; and
- 4.1.12 Photographs or videos of you taken at OGA or School events.

## **5 How we use your personal information**

### **5.1 We use your information for the following purposes:**

- 5.1.1 To facilitate contact between members of the OGA;
- 5.1.2 To keep you informed about events and activities organised by the OGA or the School, such as reunions, concerts, plays and lectures, and in relation to the organisation of and your attendance at those events;
- 5.1.3 In connection with ways in which you might participate in the organisation and the activities of the OGA, including volunteering and fundraising;
- 5.1.4 In connection with your providing financial support to the School, including making donations to the School, specific fundraising campaigns and requests for sponsorship;
- 5.1.5 or for the maintenance of a historical record about the School, historical research or statistical purposes; and
- 5.1.6 To comply with our legal obligations.

## **6 Who we share your personal information with**

### **6.1 The third parties with whom we will or may share your personal information are:**

- 6.1.1 Other members of the OGA and with the School;
- 6.1.2 Local authorities, the Independent Schools Inspectorate and the Department for Education in accordance with our legal obligations, for example regarding safeguarding concerns;
- 6.1.3 Law enforcement bodies for safeguarding purposes, the prevention and investigation of crime and the prosecution of offenders;

- 6.1.4 Other emergency services, the Health and Safety Executive and our insurers in the event of an emergency or incident at the School or one of our events;
- 6.1.5 Our legal advisers for the purpose of obtaining legal advice;
- 6.1.6 Event booking platforms or joint hosts in connection with your attending events;
- 6.1.7 External contractors we use to help us with our work, for example, printing companies for our literature, cloud computing services or database management or wealth intelligence consultants;
- 6.1.8 Persons arranged by the School for the purposes of maintenance of a historical record about the School, historical research or statistical data;

6.2 We will only share personal information when we have a good reason to do so.

## **7 Whether information has to be provided by you, and if so why**

7.1 The provision of your personal information is necessary to our activities. If you object to the provision of certain information, this may prevent you from participating in the activity to which it relates.

## **8 Reasons we can collect and use your personal information**

8.1 We rely on a number of different lawful bases in order when we collect and use your personal information.

8.2 **Contract:** this allows us to process personal information where necessary for the performance of a contract to which you are a party (or intend to become a party). It applies where, for example, you buy tickets from us for an event that you want to attend.

8.3 **Legal obligation:** this allows us to process personal information where necessary to comply with a legal obligation to which we are subject. It applies where, for example, we keep a record of who is attending an event, so that we can comply with our health and safety obligations.

8.4 **Vital interests:** this allows us to process personal information on those very rare occasions where it is necessary to protect you or someone else from risk of death or serious injury.

8.5 **Public task:** this allows us to process personal information where necessary for the performance of a specific task which is in the public interest and set out in law, such as the reporting of safeguarding concerns.

8.6 **Consent:** in limited circumstances, we will not process your personal information without your prior consent, for example, if we believe that photographs or videos of

you are more than usually intrusive or if consent is required by data protection laws to send you unsolicited direct marketing material by email or text. You can withdraw your consent at any time by contacting our Privacy Officer using the contact details at the end of this notice. Any use of your personal information before you withdraw consent remains valid.

**8.7 Legitimate interests:** this allows us to process personal information where necessary for our or another person's legitimate interests except where you have overriding privacy interests. We rely on this lawful basis for a large part of our processing activities and the legitimate interests which we have identified include:

**8.7.1** Ensuring that there is an active membership within the OGA;

**8.7.2** Promoting the objects and interests of the OGA, including fundraising;

**8.7.3** Administering our events;

**8.7.4** Safeguarding and promoting the welfare of our pupils with whom you may be in contact;

**8.7.5** Arranging work experience or mentoring for pupils;

**8.7.6** Ensuring that we comply with our legal obligations;

**8.7.7** Ensuring Site and IT security;

**8.7.8** Using your information in connection with legal disputes, for example if you make a claim against us; and

**8.7.9** Protecting our reputation.

**8.8** We may rely on more than one lawful basis for some of our processing activities.

## **9 How long your personal information will be kept**

**9.1** We will not retain your personal information for longer than necessary for the purposes set out in this notice. It follows that our retention periods will vary depending on the type of personal information concerned, for example, we will retain your contact details for as long as you want to be part of the OGA; if you don't want us to contact you, we will need to retain a record of that, so that we don't inadvertently add you to our mailing list in the future.

**9.2** Our retention periods are generally dictated by the following criteria:

**9.2.1** Statutory or regulatory requirements;

**9.2.2** The limitation period within which legal claims may be brought and the duration of any claims;

**9.2.3** The period for which your personal information is still being used, for example, to keep you informed about our news and how you can support us or for historical research or statistical purposes.

**9.3** When it is no longer necessary to retain your personal information, we will delete or anonymise it.

## **10 Keeping your personal information secure**

**10.1** We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine need to know it. Those processing your information on our behalf will do so only in an authorised manner and are subject to a duty of confidentiality.

**10.2** We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **11 Transfer of your information out of the UK**

**11.1** We do not usually transfer your information out of the UK during the course of our general operations. There are some exceptions which include:

**11.1.1** Where you ask us to communicate with you overseas, for example, if you are on holiday or live outside the UK;

**11.1.2** Where we need to communicate with third parties in relation to an event outside the UK.

**11.2** We will ensure that any transfers of your personal information outside the UK are made:

**11.2.1** With your consent;

**11.2.2** To countries or organisations which are the subject of an EU Commission adequacy decision or a UK adequacy regulation as appropriate;

**11.2.3** Subject to an agreement containing the EU's standard contractual clauses or the UK's standard data protection clauses as appropriate; or

**11.2.4** Otherwise in compliance with applicable data protection laws.

For more information about the safeguards in place for our transfers of personal information outside the UK, please contact the privacy officer.

## **12 Your rights**

**12.1** Under applicable data protection laws, you have a number of important rights which you can exercise free of charge. In summary, those include the right to:

**12.1.1** Access your personal information and certain other supplementary information that this Privacy Notice is already designed to address;

**12.1.2** Require us to correct any mistakes in your information which we hold;

**12.1.3** Require the erasure of personal information concerning you in certain situations;

**12.1.4** Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit that information to a third party in certain situations;

**12.1.5** Object at any time to processing of personal information concerning you for direct marketing;

**12.1.6** Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;

**12.1.7** Object in certain other situations to our continued processing of your personal information, for example, where we process personal information on the basis of 'legitimate interest'; and

**12.1.8** Otherwise restrict our processing of your personal information in certain circumstances.

**12.2** For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the UK GDPR.

**12.3** If you would like to exercise any of these rights, please:

**12.3.1** Contact our Privacy Officer;

**12.3.2** Let us have enough information to identify you;

**12.3.3** Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and

**12.3.4** Let us know the information to which your request relates.

In some circumstances, we may need a pupil's authorisation to respond to a request for information about them by a parent.

**12.4** If you would like to unsubscribe from any marketing communications you receive from us, please contact our Privacy Officer. It may take up to five working days for any changes to be implemented. Until that point, our continued use of your information will be lawful.

### **13 How to complain**

**13.1** We hope that we can quickly and satisfactorily resolve any query or concern you raise about our use of your information. Please contact our Privacy Officer in the first instance.

**13.2** You also have the right to complain to the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>. If you live or work outside the UK but within the EU or EEA, you can also complain to your local supervisory authority.

### **14 Changes to this Privacy Notice**

**14.1** We may change this Privacy Notice from time to time. Please check it periodically.

### **15 How to contact us**

**15.1** Please contact our Privacy Officer if you have any questions about this privacy notice or your data protection rights using the following contact information:

**15.1.1** By email on [privacy@godolphin.org](mailto:privacy@godolphin.org);

**15.1.2** By post at Godolphin School, Milford Hill, Salisbury, SP1 2RA.

### **16 Do you need extra help?**

**16.1** If you would like this notice in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).