



Fundraising and Development Privacy Notice

How we use your information

1. Introduction

- This notice explains **how** and **why** the Kingham Hill School Development Office collects personal information about you when carrying out our fundraising and development activities.
- This notice also outlines **what we do** with your information and what **decisions** you can make about your information in relation to fundraising and development.
- If you have any questions about this notice please contact the Development Officer at development@kinghamhill.org. If the Development Officer is not available, you can contact the School Reception at reception@kinghamhill.org or 01608 658999 in relation to any of the matters set out in this document.
- The School works in close conjunction with the Kingham Hillians Association (KHA). The Alumni society is independent from the School
- This notice just covers how the School uses your personal data for fundraising and development purposes. For more information about how the School uses your information more widely (for example, in relation to the provision of education to pupils) please ask the Bursar for a copy of the appropriate privacy notice. The Bursar can be contacted at c.thompson@kinghamhill.org.

2. What is personal information?

- Personal information is information that identifies you as an individual and relates to you.
- This includes your contact details, your relationship with the School and financial information.
- **What personal information does the School hold about you and how is this obtained?**
- We receive information about you from other teams within the School but only where this is relevant to our work. We hold a specific database with information about alumni, parents, staff, former parents, former staff and other supporters.
- You provide us with information about yourself during the course of our relationship with you. For example, when you sign up to receive communications from us or order tickets for events.
- In addition, we will obtain your information from other sources. These are LinkedIn, Facebook, Twitter and media articles.
- We will hold information such as:
 - The dates when you or your child attended the School (if applicable)
 - If you are a former staff member the dates when you worked at the School
 - Your contact details
 - Your boarding house at school

- Information about your activities and interests e.g. which sports team you were part of as a pupil
- Where you attended university and your occupation (if applicable)
- How you like to hear from us e.g. whether you have signed up to receive emails from us
- Your involvement with us e.g. if you carry out careers support to pupils.
- Records of any donations
- Your Gift Aid status, if applicable
- Information from articles in the media
- Any dietary requirements for catering purposes that you have provided
- Any disability which you may have so that we may make reasonable adjustments for you.

3. Why do we use your personal information?

- We use your information in the following ways:
 - To keep you informed about events and activities and in relation to your attendance at those events
 - To facilitate interaction between members of the School community, for example, when we provide an online portal to allow alumni to connect with the School
 - To tell you about products sold to benefit the School such as clothing and sports goods
 - To keep you informed about what is happening at the School, for example, by sending you a copy of the School alumni magazine
 - In connection with providing financial support to the School (including making donations to the School, specific campaigns, such as for a new sports centre, and requests for sponsorship)
 - In connection with the other ways in which you might support the School (such as when you volunteer).
- We will contact you for the above purposes by email, telephone, post or by text message but we 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.
- If you wish to make a donation, particularly a donation of a substantial value, we may need to verify your identity and/or carry out financial due diligence on you. This may involve taking and retaining copies of your identification documents and obtaining your personal information from the following sources: internet search engines, 192.com, the Charity Commission, Zoopla, Business Week and related media articles. This is to comply with our legal obligations.
- We will 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 then we may ask for consent first.

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

- If you use a third party platform to donate then we will receive information about you from them.
- If you attend one of our events and use our online booking system through eTapestry, the information will be retained within the eTapestry database.

- In accordance with our legal obligations, will share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns.
- On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders.
- We may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- We will need to share information if there is an emergency, for example, if you are hurt whilst on School premises or at one of our events.
- We use contractors to help us with our work (e.g. a printing company for our literature) or where we store our database in the cloud.
- The School shares information about you with the Kingham Hillians Association, where appropriate, but limited to name, years at school , house and attendance at events.

5. Our legal bases 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 we are using your information when this is necessary for our legitimate interests, except when your interests and fundamental rights override our legitimate interests. We rely on legitimate interests to use your information for all of the purposes described above unless any of the alternative basis in the table below apply. Specifically, we have a legitimate interest in:

- 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.
- Promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money for the bursary fund or new buildings.
- Using your personal information to administer our events.
- 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.
- Ensuring that we comply with our legal obligations.

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

Consent

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

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. To withdraw your consent please contact the Development Officer at development@kinghamhill.org.

Necessary for a contract

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 a concert

that you want to attend.

Legal obligation

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

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

- The School 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.

The School's bases for processing special personal information will depend on the circumstances:

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.

These two conditions may also apply if we ever need to process information about criminal convictions and offences.

Substantial public interest:

The School is also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This will apply if we need to use special category data in connection with your attendance at one of our events. For example, if we need to make adjustments because of a disability you have.

6. Sending your information to other countries

- We may send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may store your information on computer servers based overseas.
- The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en.
- 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, in the absence of any other safeguards, it might not have the same level of protection for personal information as there is in the UK.
- Where appropriate we may put in place additional safeguards, for example, if we are using a third party to process a payment then we may ask them to contract with us using model data

protection clauses provided by the European Commission in the absence of any other appropriate safeguard. If you would like more information about the safeguards that are in place please contact the Development Officer.

7. For how long do we keep your information?

- We will keep information about you 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.
- 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.
- We will keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School.
- The School will also keep information for a long time as part of its wider legal and regulatory obligations, even if that information is no longer needed for marketing, development or fundraising 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 Bursar.
- Our information and records retention policy sets out how long we keep different types of information.

8. What decisions can you make about your information?

- From May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:
 - **Rectification:** if information held about you by the School is incorrect you can ask us to correct it
 - **Access:** 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
 - **Deletion:** 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
 - **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer in certain circumstances
 - **Restriction:** our use of information about you may be restricted to simply storing it 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
 - **Object:** you may object to us using your information where:
 - We are using it for direct marketing purposes (e.g. to send you the School magazine
 - The legal bases on which we are relying is legitimate interests. Please see the section "Our legal bases for using your information" above

- We are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons.
- The Development Officer can give you more information about your data protection rights. To exercise any of your rights you can submit your request in writing to the Development Officer at development@kinghamhill.org.

9. Further information and guidance

- The Development Officer is the person responsible at our school for managing how we look after personal information and deciding how it is shared in relation to fundraising and development.
- 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. The Development Officer can answer any questions which you may have.
- Please speak to the Development Officer if:
 - You object to us using your information for marketing purposes e.g. to send you information about fundraising events. We will stop using your information for marketing purposes if you tell us not to.
 - You would like us to update the information we hold about you.
- 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.

Nanci Austin

Last reviewed: April 2019

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