



EPSOM

COLLEGE

How We Use Your Information - Privacy Notice for fundraising and development and OE activities

Introduction

This notice explains **how** and **why** your personal information is used when you support Epsom College, for example, when you make a donation or interact with the OE community, attend an event or give us your details for our records.

Fundraising and development are led by the Development Department which is part of Epsom College. The Development Department works in conjunction with the OE Club, which is also part of Epsom College. Therefore, this privacy notice covers how the Development Department and the OE Club use personal data.

This notice outlines **what we do** with your information and what **decisions** you can make.

Under data protection law, the College is the "data controller". That means that the College is responsible for how your personal data is used. In this notice, "we" is a reference to the College which includes the Development Department and the OE Club. Fundraising and development are carried out on a day to day basis by the Development Department and the OE Club.

If you have any questions about this notice please contact the Director of Development, whose contact details are helen.tranter@epsomcollege.org.uk or 01372 821290.

This notice only covers how the College uses your personal data for fundraising and development purposes. For more information about how Epsom College uses your information more widely (for example, in relation to the provision of education to pupils) please ask the COO for a copy of the appropriate privacy notice. The COO can be contacted as follows: COO@epsomcollege.org.uk or 01372 821133.

What is personal data?

Personal data is information that identifies you as an individual and relates to you.

This includes your contact details, your relationship with the College and financial information.

What personal information do we hold about you and how is this obtained?

We receive information about you from other teams within the College but only where this is relevant to our work. We obtain information from marketing and admissions about the dates when you attended the College and also from ISAMS, registry and archives. We hold a specific database with information about alumni, parents, staff, former parents, former staff and other supporters.

You provide information about yourself when you interact with the College community, for example, when you sign up to receive OE newsletters or attend events.

In addition, we will obtain your information from other sources, which we use for the purposes described below. These are others who are involved in our development activities, for example, other members of your family and another alumnus might tell us about your interests or your career.

We will hold information such as:

- your name, gender, and date of birth;
- information about your family, for example, whether you have any brothers or sisters who attended the College;
- any connection you may have with other members of the College community, such as other alumni;
- the dates when you or your child attended the College (if applicable);
- if you are a former staff member, the dates when you worked at the College;
- your contact details;
- information about your achievements 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. This includes correspondence with you, your attendance at our events, and whether you carry out mentoring of current pupils, or give careers advice;
- records of any donations;
- your Gift Aid status if applicable;
- information from articles in the media;
- any dietary requirements for catering purposes; and
- any disability which you may have so that we may make reasonable adjustments for you.

Why do we use your personal data?

We use your information in the following ways:

- to keep you informed about OE events and reunions and in relation to your attendance at those events (for example, so that we can accommodate you if you tell us about any special needs or dietary requirements);
- to facilitate interaction between members of the College community, for example, there is an online portal, OEs Connected, to allow OEs to communicate:
 - OEs Connected can only be accessed by alumni using a password. Once logged into the portal, alumni can search for details about other alumni. The basic profile consists of your full name, dates of attendance and College House.
 - **Please note that your basic profile (as described above) is automatically revealed when searched for unless you have asked for it not to be included.** If you would prefer not to be included please contact the Director of Development whose contact details are helen.tranter@epsomcollege.org.uk or 01372 821290.

- If you provide additional information (e.g. your occupation) then this will also be displayed when someone searches for you, if you have made this information public. At any time, you may change your privacy setting through OEs Connected.
- You can also use this portal to update the information that we hold about you e.g. contact details.
- OEs Connected can be found here:
<https://epsomcollege.alumni-online.com/frmMain.aspx?ReturnUrl=/>
- to tell you about products sold to benefit the College, such as sponsored bricks or chairs, clothing and sports goods;
- to keep you informed about what is happening at the College, for example by sending you OE newsletters, leaflets and magazines;
- in connection with providing financial support to the College (including when you make a donation to support the College (including for specific capital campaigns and bursaries));
- in connection with the other ways in which you might support the College community (such as when you volunteer). For example, we facilitate a number of careers events for students involving OEs; and
- we may collect your contact details and the date/time that you attended an event organised by us for COVID-19 contact tracing purposes.

You may be contacted 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 in a particular way, or for any of these purposes, then we will of course respect that request and this will be recorded on the database and acted upon accordingly.

We may take photographs or videos of you to use in our publicity or on our social media platforms and websites. Our social media platforms include Facebook, Twitter, LinkedIn and Instagram. We will let you know before any photographs or videos are taken. If we consider that the photograph or video is more privacy intrusive then we may ask for consent first.

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 data from the following sources: internet search engines, 192.com, the Charity Commission, Zoopla and other property websites, Business Week, LinkedIn and related media articles. This is to comply with our legal obligations.

The activities of the Development Department and the OE Club are intrinsically linked (because they are both part of the College) and we use a shared database. For example, the Development Department and the OE Club have access to your name and contact details so that they can interact with you as set out in this privacy notice.

We would like to find out more about you from other sources to help make sure that communications to you are relevant. This will help us build up a picture of your job, hobbies, interests and preferences to enable us to tell you about OE events and opportunities which may be of particular interest to you. We obtain this information via publicly available sources such as via internet search engines and magazine and newspaper articles. We may also find out about you if you post something on social media, or if another member of the College community tells us.

In addition, we may obtain your personal information from sources such as internet search engines, and related media articles, LinkedIn, Facebook and Social Media platforms. This is to help us keep our records as up to date as possible and help us to comply with our legal obligations. For example, we may find out more about someone so that we can check that we are able to accept a donation from them.

How and why does the College share your personal data with third parties?

- We publish information about our alumni and others connected to the College (e.g. former staff) in our magazine.
- We also publish obituaries in our magazine but only do so with information provided to us by your family or other persons connected to you (e.g. your family's lawyers). If you would prefer that we do not publish an obituary in relation to you please let us know.
- If you attend one of our events, then we may share your information with event booking platforms that we use.
- In accordance with our legal obligations, we may share information with local authorities, school inspectors and the Department for Education, for example, where we have any safeguarding concerns and HMRC and financial institutions for financial compliance.
- We may share your contact details and the date/time that you attended an event for the purpose of contact tracing. This information will only be shared with the NHS Track and Trace (or a similar government scheme) if specifically requested by them and in accordance with data protection law.
- 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 professional advisors. For example, we may share your personal data with our legal advisers for the purpose of obtaining legal advice.
- We may need to share information if there is an emergency, for example, if you are hurt whilst on College premises or at one of our events.
- We will share information with HMRC in connection with Gift Aid claims.
- We may 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.
- We would personally contact you if we receive a specific request from an OE to establish contact with you.

Our lawful bases for using your information

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

Consent

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

If we ask for your consent to use your personal data 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 Director of Development at helen.tranter@epsomcollege.org.uk.

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 except where we have asked you for your consent (in which case consent applies as the lawful basis).

Specifically, we have a legitimate interest in:

- ensuring that there is an active community of supporters which will benefit the College and members of the College community, such as current and former pupils and parents;
- promoting the objects and interests of the College. This includes fundraising e.g. if we want to raise money for a bursary fund or new buildings;
- using your personal data to administer our OE events and send out invitations that we consider will be of interest to you and your family;
- safeguarding and promoting the welfare of our current and former pupils with whom you may be in contact e.g. if you provide careers advice to a pupil; and
- 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 contact the Director of Development.

Necessary for a contract

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 OE event or reunion that you want to attend or make a donation or pledge.

Legal obligation

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 or for contact tracing purposes, and financial record keeping and compliance.

Vital interests

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

Public interest task

We rely on this basis (as well as legitimate interests) where we use personal data in order to look after those we are responsible for. For example, if we needed to carry out checks on someone before allowing them to mentor our pupils.

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Other countries

When the College sends personal data outside of the UK, we have to consider if the other country has the same level of protection for personal data as there is in the UK. Some countries are considered by the UK Government to have adequate rules and this includes all of the European Economic Area and some other countries, such as, New Zealand, Argentina and Japan.

Our alumni reach is global and therefore in certain limited circumstances, we may send information about you to recipients in countries which do not have the same level of protection for personal data as there is in the UK. For example, we may send the OE Magazine containing an article about you to alumni overseas.

If you have any questions about international transfers of personal data, please contact the Director of Development.

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 as long as you want to be part of the school community so that we can communicate with you. Similarly, we will retain information about your involvement with the College as this helps us tailor our communications to you both now and in the future.

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.

We will retain information for contact tracing for a short period of time from the date of your visit. As of June 2021, this time period is 21 days.

We also keep some information indefinitely for archiving purposes (this is known as "archiving in the public interest" under data protection law) and for historical research purposes. This includes the College's legitimate interest in research; supporting long-term accountability; enabling the discovery and availability of the College's and the wider school community's identity, memory, culture and history; enabling the establishment and maintenance of rights and obligations and of precedent decisions; educational purposes; and commercial and non-commercial re-use. For example, we keep some old photographs so that we have a record of what the College was like in the past. Information held in our archive may be made publicly available but this would only be done in compliance with data protection laws.

The College may also keep information for a long time as part of its wider legal and regulatory and financial 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

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data is used by the College more widely, please contact the COO.

Although the College keeps the majority of your personal data for a very long time, there are some exceptions to this. Further information can be found in our Information and Records Management Policy which can be found on the College website: <https://www.epsomcollege.org.uk/wp-content/uploads/2020/03/Information-and-Record-Management-Policy-2020.pdf>

What decisions can you make about your information?

Data protection law gives you a number of rights regarding your information. Your rights are as follows:

- Correction: if information held about you by the College 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 in the course of providing you with OE services.
- 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 a computer in certain circumstances.
- Restriction: you can request that we restrict how we use your personal data.
- Object: you may object to us using your information where:
 - we are using it for direct marketing purposes (e.g. to send you an email about a fundraising opportunity);
 - the lawful bases on which we are relying is either legitimate interests or public task. Please see the section "Our lawful bases for using your information" above;
 - if we ever use your information for scientific or historical research purposes or statistical purposes.

The Director of Development 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 Director of Development at Development Department, Epsom College, College Road, Epsom KT17 4JQ or contact her on 01372 821290.

Further information and guidance

The COO and the Director of Development are responsible for managing how we look after personal data and deciding how it is used 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 data. The Director of Development can answer any questions which you may have.

If you fail to provide certain information when requested, we may not be able to provide the information or service you have requested. We may also be prevented from complying with our legal obligations.

You have a right to lodge a complaint with the Information Commissioner's Department - ico.org.uk. If you do have any concerns about how we have handled your personal data, we would kindly ask that you contact us in the first instance before you speak to the ICO, so that we have an opportunity to put things right.