



# 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 is led by the Education Trust. The Education Trust also works in conjunction with the OE Club. Therefore, this privacy notice covers how the Education Trust 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 ultimately responsible for how it, the Education Trust and the OE Club uses your personal data. In this notice, "we" is a reference to all three. Although the College has ultimate responsibility, fundraising and development is carried out on a day to day basis by the Education Trust and the OE Club.

If you have any questions about this notice please contact the Education Trust Director whose contact details are [helen.tranter@epsomcollege.org.uk](mailto:helen.tranter@epsomcollege.org.uk) or on 01372 821290.

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 Bursar for a copy of the appropriate privacy notice. The Bursar can be contacted as follows: [bursar@epsomcollege.org.uk](mailto:bursar@epsomcollege.org.uk) or on 01372 821133.

### **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 College and financial information.

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

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.

The information held about you includes the following:

- the dates when you or your child attended the College;
- 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;
- 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 assistance at events;
- 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.

### **How is your information used?**

Your information is used in the following ways:

- to keep you informed about OE events and reunions and in relation to your attendance at those events;
- to facilitate interaction between members of the College community for example there is an online portal, OE Connected, to allow OEs to communicate. This can be found here <https://epsomcollege.alumni-online.com/frmMain.aspx?ReturnUrl=/> .
- to send you OE newsletters and magazines;
- when you make a donation to support the College (including for specific capital campaigns and bursaries); and
- 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.

You may be contacted for the above purposes by email, telephone, post or by text message. 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.

The activities of the Education Trust and the OE Club are intrinsically linked and we use a shared database. For example, the Education Trust 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 may use a Direct Marketing Association registered organisation to help up check that we have an up-to-date address for you.

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 publically 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 is your personal information shared with third parties?**

- 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.
- On occasion, we may need to share information with the police.
- We may also need to share information 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 may use contractors to help us with our work (e.g. a printing company for our literature)
- We would personally contact you if we receive a specific request from an OE to establish contact with you.

### **Our legal grounds for using your information**

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

#### 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 Education Trust Director at [educationtrust@epsomcollege.org.uk](mailto:educationtrust@epsomcollege.org.uk).

#### Legitimate interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to you.

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 the bursary fund or new buildings;
- using your personal information 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 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 Education Trust Director.

#### 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, financial record keeping and compliance.

#### Vital interests

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

#### Public interest

We consider that we are acting in the public interest when carrying out marketing, fundraising and development. This is because such activities ultimately benefit the College and the wider College community through, for example, raising funds for the College and providing support for current and former pupils, reunions, events and OE vested interest in our activities.

## **Other countries**

We may send you information when you are overseas, including when you are in a country, which does not have the same level of protection for personal information as there is in the UK. For example, we may communicate with you when you are overseas if you are on holiday or if you live in a different country.

The European Commission has produced a list of countries that have adequate data protection rules. The list can be found here: [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)

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 check that they are contracting with us using model data protection clauses provided by the European Commission. If you would like more information about the safeguards that are in place please contact the Education Trust Director.

## **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 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 may 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 College.

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 information is used by the College, more widely please contact the Bursar.

### **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:

- if information is incorrect you can ask us to correct it;
- 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 sorts of organisations we have sent it to in the course of providing you with OE services;
- 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;
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by a computer; and
- 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.

The Education Trust Director can give you more information about your data protection rights.

### **Further information and guidance**

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 Education Trust Director can answer any questions that you may have.

Please contact the Education Trust Director if:

- you object to the use of your information for marketing purposes e.g. to send you information about OE events. We will stop using your information for marketing purposes if you tell us not to; or
- 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](http://ico.org.uk).