

Alumnae, development and fundraising privacy notice

Withington Girls' School

May 2019

Introduction

This notice explains **how** and **why** the school's Development Office collects personal information about you when carrying out our alumnae relations, development and fundraising.

This notice also outlines **what we do** with your information and what **decisions** you can make about your information in relation to alumnae relations, development and fundraising.

If you have any questions about this notice please contact the Director of Development whose contact details are 0161 249 3491 or development@wgs.org. If the Director of Development is not available, you can contact the Development Office on 0161 249 3494 or postal address Development Office, Withington Girls' School, Wellington Road, Manchester M14 6BL in relation to any of the matters set out in this notice.

The alumnae association, Withington Onwards, is run by the School's Development Office and this notice also covers how Withington Onwards uses your personal information.

This notice just covers how the School uses your personal data for alumnae relations, development and fundraising 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 or visit the website at <https://www.wgs.org/about-withington/data-protection/>. The Bursar can be contacted as follows: senns@wgs.org or 0161 249 3469.

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 obtain information from the school office about the dates when you attended the School and also your contact details, school house, form, university destination & course, positions of responsibility in the sixth form, sports colours and if you were a bursary recipient. We also obtain parent contact information, occupation and marital status from the school office.

We hold a specific database with information about alumnae, 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 public sources. These include but are not limited to Companies House, the Electoral Register, LinkedIn, the internet, Zoopla, Bloomberg, Facebook, Twitter and media articles.

If you would like to update your details or communication preferences, please email development@wgs.org

The information we collect is used for the purposes described in the sections below.

We will hold information such as:

- your name, gender, and date of birth;
- information about your family, for example, whether you have any sisters who attended the School;
- any connection you may have with other members of the School community, such as other alumnae;
- 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;
- 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 have volunteered to assist with careers support for current pupils;
- records of any donations;
- and 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 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;
- 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 Bulletin or our alumnae magazine called Withington Onwards;
- in connection with providing financial support to the School (including making donations to the School, specific campaigns, such as for our bursary programme, and requests for sponsorship). We have set out further information on this in the section below. Please see "How do we use your data in our fundraising programmes?";
- in connection with the other ways in which you might support the School, such as when you volunteer. If you volunteer, this may include helping with our careers programme – speaking to our pupils, attending a careers event, acting as a mentor or offering work experience/placements; and
- in connection with any research we carry out. For example, we may ask you to complete a survey, provide feedback or join one of our focus groups.

We will contact you for the above purposes by [email, telephone, social media, 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.

We will use the information we collect about you to tailor our communications to you. For example, we may invite you to talk at one of our careers events based on your occupation and we may invite you to particular events based on your interests and hobbies.

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.

How do we use your data in our fundraising programmes?

Philanthropy has long made an enormous impact on our School and the girls who have been educated here. As we are a fundraising institution, we may use the information about you to help us to understand more about you as an individual and your ability to support the School, including financially. This is known as prospect research. We may use information you provide to us as well as information gathered from public sources (see above for some examples), other School departments and members of the school community, and information we collect through your interaction with us (such as your history of giving). We use this information to undertake analysis of who might support the School. By doing this, we can focus conversations we have with you about fundraising in the most effective way. You can always opt out of this research.

There is an obligation for the School to undertake a degree of due diligence when approaching potential donors or accepting donations, particularly for gifts in excess of £10,000. We use publicly available sources to carry out this due diligence on donors in line with the School's Fundraising Code of Practice and to meet money laundering regulations.

Fundraising is a key part of the Development Office's work, and we are committed to working in a transparent, ethical, responsible and honest way. To reflect this commitment, we are a member of the Fundraising Regulator and committed to the Regulator's Code of Practice as well as our own Fundraising Code of Practice.

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, then we will share your information with event booking platforms such as Eventbrite.
- In accordance with our legal obligations, will share information with local authorities, the Independent Schools Inspectorate / Ofsted 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 will share information with HMRC in connection with Gift Aid claims.
- We use contractors to help us with our work (e.g. a printing company for our literature), our auditor or where we store our database in the cloud.

- The School shares information about you with Withington Onwards. This is explained in more detail above.
- We may use trusted third-party partners to automate some of our work, this includes in respect of prospect research. In this situation, we would supply the third-party with basic contact and identity details such as your name and address. The third party then uses information about you that is in the public domain to assess the potential for support. We then use this information in order to personalise communications with you - including not contacting individuals who have limited capacity for charitable donations.

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 bases 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 current and former pupils with whom you may be in contact e.g. if you arrange work experience or mentor 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 speak to the Director of Development.

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 Director of Development at development@wgs.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.

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.

The above conditions may also apply if we ever need to process information about criminal convictions and offences. For example, we would be relying on substantial public interest if processing information about criminal convictions in connection with carrying out due diligence on a prospective donor.

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.

The Development Office database is cloud hosted by our partner (Raiser's Edge by Blackbaud) in an EU compliant (Private Shield) system in the USA.

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 Director of Development.

For how long do we keep your information?

We have an ongoing relationship with you and we would like you to be involved with the School for many years to come. For this reason, the Development Office keeps the majority of the personal information it holds about you indefinitely. For example, we keep your contact details so that we can continue to stay in touch with you. Similarly, we will retain information about your involvement with the School as this helps us tailor our communications to you both now and in future.

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 can also keep information about you for a very long time or even indefinitely if we are retaining it for archiving purposes (this is known as "archiving in the public interest" under data protection law). For example, we keep old photographs so that we have a record of what the School was like in the past.

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, alumnae relations, 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.

Although the Development Office keeps the majority of your personal information for a very long time, there are some exceptions to this. Further information can be found in our records retention policy.

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:

- **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 an email about a fundraising opportunity);
 - the legal bases on which we are relying is legitimate interests. Please see the section "Our legal bases for using your information" above;
 - if we ever use your information for historical or scientific 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@wgs.org, 0161 249 3491 or postal address Development Office, Withington Girls' School, Wellington Road, Manchester M14 6BL

Further information and guidance

The Director of Development is the person responsible at our school for managing how we look after personal information and deciding how it is shared in relation to alumnae relations, development and fundraising.

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 Director of Development can answer any questions which you may have.

You have a right to lodge a complaint with a data protection supervisory authority. The supervisory authority in the UK is the Information Commissioner's Office - ico.org.uk. If you do have any concerns about how we have handled your personal information 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.