

## Development and Alumnae Privacy Notice

The Development Office, which encompasses the Old Girls' Association, is part of the school which means that the school is responsible for how your information is used. The school's Privacy Notice outlines the legal basis by which St Albans High School for Girls processes a wide range of personal data and is available on our website <a href="www.stahs.org.uk/privacynotice">www.stahs.org.uk/privacynotice</a>. It applies to prospective, current and past: pupils and their parents; staff and contractors; donors, supporters and other individuals connected to or visiting the school whose personal data we may process.

The Development and Alumnae Privacy Notice explains in more detail how and why the Development Office and OGA may use (or "process") personal data and what we do with that information. It also explains the decision that you can make about your own information. Data protection legislation gives individuals rights to understand how their data is used. It should be read in conjunction with the school's main Privacy Notice.

The school has appointed the Compliance Officer as the individual with responsibility for dealing with requests and enquiries concerning the school's uses of personal data and he/she will endeavour to ensure that all personal data is processed in accordance with this Privacy Notice and data protection legislation.

Please read this Privacy Notice carefully, and if you have any questions regarding your personal data or its use, please contact us at <a href="mailto:info@stahs.org.uk">info@stahs.org.uk</a> or by telephone on 01727 853800. St Albans High School for Girls (STAHS) is committed to ensuring that your privacy is protected. STAHS is a company limited by guarantee with company registration number 00321911 and a registered charity with charity registration number 311065. We are registered as a data controller with the Information Commissioner's Office under registration number Z8481995.

## Types of personal data we process

The Development Office has a separate database from the other departments at the school. This database contains personal information collected by the school and the OGA during the course of our relationships with pupils, alumnae, parents, supporters and friends. Examples of information we hold includes:

- Names, date of birth, addresses, telephone numbers, email addresses and other contact details
- Family details
- Relevant information about your time at the school
- Relevant information about your subsequent education after leaving the school
- Information about your occupation and professional interests
- Your relationship with other members of the alumnae community

- Records of your engagement with the school or OGA events and activities
- Photographic images
- Records of financial information such as donations, and bank details for the purpose of processing donations

Personal information is information that identifies you as an individual – it may be factual information, images or other recorded information.

## What we do with the information we gather

The Development Office supports the school through the creation of meaningful relationships with alumnae, pupils, parents (both current and former) supporters and friends of the school.

We do this by offering social and networking events, producing printed and electronic publications, and through our network providing careers advice for current and former pupils.

We use your personal information to ensure we contact you in the most appropriate way, to improve our offering and to ensure we work efficiently and effectively.

In many cases, we are processing your personal information because you have asked us to keep you in touch about our activities. Sometimes we will ask you for specific consent, for example to check that you want to receive information by email.

## Collecting, handling and sharing personal data

We are committed to ensuring your data is secure. We collect most of the personal data we process directly from the individual concerned, for example information that you or your parents provide on entry to the school, or on leaving the school when pupils provide their contact details by registering on our alumnae database. We also collect personal data from you when you participate in events and activities or when you donate to the school.

We will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify us of any significant changes to important information, such as contact details, held about them. An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under data protection legislation): please see below for contact details.

Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided. For the most part personal data collected by us will remain within the school and will be shared with other departments in the school for specific purposes (eg to organise a careers networking event or to ask a former pupil if they wish to speak at a school event), or with members of the OGA Committee for specific purposes (eg to send birthday cards or to invite alumnae to a specific event). OGA Committee members are subject to Data Processing Agreements.

We may have to share personal data with government authorities such as HMRC and if you interact with us through a third party (for example if you support the school via an online giving platform). As a charity, we may carry out due diligence regarding any donation which you make to the school. This may involve obtaining and recording your personal information from publicly available sources such as 192.com, LinkedIn and the Charity Commission.

We do not use third-party companies to research or profile but we may analyse publicly available information about potential donors to contact you about initiatives and events that may interest you, or to make appropriate requests. This includes information on professional social media networks such as LinkedIn.

Some of our processing activity is carried out on our behalf by third parties such as database providers and mailing houses. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions. We do not otherwise share or sell personal data to any other organisations for their own purposes.

We take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. We do not transfer personal data outside of the European Economic Area, unless it is lawful to do so under data protection legislation.

#### The lawful basis on which we use this information

We rely on legitimate interests for most of the ways in which we use your information. This means we use personal data in accordance with the school's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

Specifically, we expect that the following uses will fall within our (or another's) legitimate interests:

- holding alumnae social and networking events
- keeping the school community (past and present) up to date about our activities including sending you our publications electronically and by post
- fostering life-long relationships with our alumnae community to support our development and objectives
- keeping a record of our alumnae for historical or research purposes
- ensuring that we comply with any statutory obligations including; safeguarding and promoting the welfare of our pupils with whom you may come into contact
- ensuring we meet our obligations around financial record keeping including for the purposes of Gift Aid
- Ensuring that all relevant legal obligations of the school are complied with; and where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

## How long we keep personal data

The school retains personal data in accordance with retention guidelines for the sector. Please see the school Privacy Notice for more information: <a href="https://www.stahs.org.uk/privacy-notice">www.stahs.org.uk/privacy-notice</a>

The Development Office will keep information about you as long as we have a legitimate or legal reason to do so and in line with our data retention policy. We consider our relationship with alumnae, donors and other stakeholders to be life-long. This means that we will maintain a stakeholder record for you until such time as you tell us that you no longer wish us to keep in touch. In this instance we will delete the majority of your personal data that we hold, but will maintain basic personal data to ensure that we do not inadvertently create a new record in the

future. We will always try to ensure that the information we hold about you is up to date, reasonable and relevant. You may change your contact preferences at any time.

# Your rights

Data protection legislation gives you a number of rights regarding your information as follows. Please also refer to the school's Privacy Notice for more information on the individual's rights under Data Protection legislation.

You can tell us at any time that you do not wish to receive fundraising or other information promoting our activities and events. You can also change your communication preferences by directly contacting us or by following the link in the communications we send to you.

You always have the right to withdraw consent, where given, or otherwise object to receiving generic or fundraising communications. Please be aware however that the school may have another lawful reason to process the personal data in question even without your consent. That reason will may have been asserted under this Privacy Notice, or may exist under some form of contract or agreement with the individual (eg an employment or personal contract, or because of membership of one of our associations).

You can 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, where it came from and what types of people we have sent it to.

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 computer

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

If you would like to access or amend your personal data, or have some other objection to how your personal data is used, please make your request in writing to: the Compliance Officer, St Albans High School for Girls, Townsend Avenue, St Albans, ALI 3SJ.

We will respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to information. We will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, we may ask you to reconsider or charge a proportionate fee, but only where Data Protection law allows it.

# This Policy

This Development and Alumnae Privacy Notice should be read in conjunction with the school's Privacy Notice and with other policies and terms and conditions which make reference to personal data, including but not limited to the Parent Contract, our Safeguarding Policy, Data Protection policy, Health & Safety Policies, Acceptable Use Policies, eSafety and Cyberbullying policy and IT Policies.

We will update this Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on the website and to you directly, as far as practicable.

If you believe that we have not complied with this policy or have acted otherwise than in accordance with data protection legislation, you should notify the Compliance Officer, St Albans High School for Girls, Townsend Avenue, St Albans, ALI 3SJ. You can also make a referral to, or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with us before involving them.

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