

City of London School Development and Alumni Privacy Policy

1 Introduction

Our alumni and supporters are incredibly important to us. The Development and Alumni Office (DARO) at the School is here to keep alumni and supporters up to date with what is going on, and to engage you with benefits, events, reunions, volunteering opportunities and our fundraising campaigns. However you choose to help, we will always respect your rights and choices.

We promise to respect any personal data you share with us and to keep it safe. We aim to be clear when we collect your personal information, and not to do anything you would not reasonably expect. In this policy we tell you what we will, and will not, do with your personal data.

This policy includes:

- Who we are
- The legal basis for processing
- Our duty
- How we collect information on you
- How we will use your personal information
- Cookies
- Analytics
- Who has access to your personal information
- How we keep your personal information secure
- How long we will hold your personal information for
- Your choices
- Your right to be forgotten
- Keeping your information up to date
- Your rights
- Children and privacy
- Vulnerable circumstances policy
- Complaints, compliments or comments
- Changes to our privacy policy

If you have a question about our privacy policy then please contact a member of the DARO team who will be happy to discuss it with you. Our contact details are:

Development and Alumni Relations Office
City of London School
107 Queen Victoria Street
London EC4V 3AL

Tel: 020 3680 6315
Email: development@cityoflondonschool.org.uk

2 **Who we are**

We are the Development and Alumni Relations Office at City of London School. Visit our website (www.cityoflondonschool.org.uk) to find out more about the ways you can get involved.

3 **Legal basis for processing**

We process your data as described in this policy because we have a legitimate need to do so to deliver our alumni services and fundraising ambitions. Some processing of data may be carried out to perform a contract with you or where it is required by law, such as the completion of due diligence or obligations for processing Gift Aid on your donations. Please see the ***How we will use your personal information*** section below for more details.

To ensure we fully understand when it is appropriate to rely on consent and when it is a legitimate interest of ours to process your data we carry out a Legitimate Interest Test¹ when necessary to ensure the way in which we use your data is fair and does not personally impact you.

4 **Our duty**

In carrying out our day-to-day activities we process and store personal information relating to our supporters. We are therefore required to adhere to the requirements of the Data Protection Act 2018. We take our responsibilities under this act very seriously and ensure that the personal information we obtain is held, used, transferred and processed in accordance with that Act. We also adhere to all other applicable data protection laws and regulations including, but not limited to, the Privacy and Electronic Communications Regulations.

5 **How we collect information on you**

The information we gather allows us to provide the best possible tailored experience for our alumni and supporters, enabling us to tailor event invitations and news that are of specific interest to you.

If you are a parent of a pupil at the School, your record is automatically transferred to the DARO when your son joins the School. If you are an alumnus of the School, your record will be added when you leave the School. The information the DARO receives is:

- Name
- Title
- Gender preference
- Date of birth
- Address
- Year at the School, and leaving date

We gather personal information from you when you enquire out our activities, register for or sign in at an event, make a donation, volunteer, engage with our social media channels or otherwise provide us with your personal information.

¹ A Legitimate Interest Test is a separate balancing exercise that considers the individual's right to privacy against our need to use the personal data.

The personal information that we may request when you engage with us might include your name, age, gender preference, location and / or country information, and possibly other information, as well as credit card or other financial information needed to process donations or event fees. We may also ask you if you are a UK tax payer so that we can claim Gift Aid². We will never request personal information about your health or the health of your family members or friends, unless we inform you how that information will be used and receive your express consent for such use (i.e. for a case study story).

We also collect your business details to enhance our mentoring network and allow us to send emails and invitations that may be of interest to you.

We use third parties to collect data on our behalf to support our activities. This might include event registrations, setting up Direct Debits and processing your donations. We also, on occasion, ensure our records are as up-to-date as possible through running address and detail verification checks through sources that are deemed acceptable by the Information Commissioner's Office (ICO)³.

We may also receive information about you from other sources, which include publicly available data. Please see the **How we will use your personal information** section for more details.

To increase our fundraising reach we research information in the public domain, such as contact details for local organisations to get in touch with about our latest activities and appeals. We will not call any company or organisation registered with the Corporate Telephone Preference Service.

6 Cookies

We do not currently gather information on how you use our website through the use of cookies but we may do in the future.

Cookies are text files which identify a user's computer to our server. Cookies in themselves do not identify the individual user, just the computer used. The DARO website uses persistent cookies – these are used to track returning visitors. They expire after 12 months and enable us to compare website traffic from month to month.

Cookies help us to identify which pages are most visited and which events or activities are of most interest. This information can be used to help us improve our website and services and ensure we provide you with the best service. Wherever possible, the information we use for this purpose will be aggregated or anonymised (i.e. it will not identify you as an individual visitor to our website).

You can reject cookies. Most browsers allow you to refuse cookies – consult the 'help' section of the browser toolbar. Information on controlling or rejecting cookies is available from several sources⁴.

² Please rest assured that we do not collect information about your actual tax payments, just whether you are a tax payer.

³ See <https://ico.org.uk/>

⁴ e.g. see <https://www.aboutcookies.org/>

7 **Analytics**

The DARO website uses Google Analytics⁵ tracking codes to measure performance enabling us to enhance and improve services for our audiences. However, we do not collect personally-identifiable information (PII) as all data collected is anonymous. If you do not want Google Analytics to use your data then please visit [Google Analytics opt-out browser add-on](#).

8 **How we will use your personal information**

We may use your information for a number of purposes including the following:

- To provide you with information about our work or our activities that you have requested. This might include sending you e-newsletters, invitations to events and volunteering opportunities.
- For administration purposes (e.g. we may contact you about a donation you have made or an event you have expressed an interest in or registered for).
- To ask you for your permission to use the story of your experience with the School in order to promote our work.
- To ask you to help us raise money or donate money to the School.
- To create an account for you if you register with us.
- To process entries into a prize draw or raffle.
- For internal record keeping, including the management of any feedback or complaints.
- To use IP addresses to identify your approximate location, to block disruptive use, to record website traffic or to personalise the way our information is presented to you.
- To analyse and improve the services offered on our sites to make it as user-friendly as possible.
- Transfer for HM Revenue and Customs in respect of any Gift Aid claims.
- For statutory and regulatory compliance.
- To assess your personal information for the purposes of credit risk reduction or fraud prevention.
- To keep your records as up-to-date as possible. To help us do this we may use publicly available sources (e.g. the Post Office's National Change of Address database). Please see the **Keeping your information up-to-date** section for more details on how you can let us know if your contact details change.

In addition to this we may use your data for wealth-screening, research and profiling (see below for more information). Our purpose is to gain a better understanding of how we should engage with you, and tailor our communications more effectively and appropriately. This also helps us make informed decisions about our fundraising strategy and ensure our internal resources and investments are used as effectively as possible. Our objective is to ensure any approaches we make to you are respectful, professional and based on evidence that you might be interested in our work, providing you with the best experience we can.

8.1 **Wealth Screening**

This is carried out by a trusted third-party supplier and entails using information such as your name, postcode and data on your existing relationship with us. Wealth-screening is a tool which helps us to better understand how to approach

⁵ For full details on how Google Analytics works, please visit [Google Analytics Terms of Service](#).

you about fundraising and volunteering opportunities in an appropriate way and therefore generate funds cost-effectively.

8.2 **Research**

This could include research on financial, business, philanthropic and demographic information sources from publicly available data, such as Companies House, the Charity Commission and the media. We may also look at professional networks, such as LinkedIn, and process special category data if it has manifestly been made public by you (e.g. through an interview or a publicly directed social media post). In addition, we may combine the data you provide us with data obtain from other sources (e.g. to verify we have correct addresses / postcodes).

8.3 **Profiling**

This could include analysis of financial, philanthropic and other personal data we hold on you to assess the likelihood that you might wish to engage with us, as well as broader data analysis. This analysis helps us to gain a better understanding of how to approach you, or your interests, and of broader demographic, geographic and engagement trends amongst our supporters. This process is not solely automated processing and always contains manual assessment to ensure we are making correct assumptions from the analysis.

If you do not wish your data to be used in any of these ways or have questions about this, you have the choice to change your privacy options and can notify us using the contact details in the **Introduction** section. If you are unsure and have further queries on how we might use your data, please contact us and we will answer your questions.

In order to comply with our legal obligations under the Charity Commission Regulations and the Fundraising Regulator's Code of Practice, we may also undertake due diligence research to assess the source of funds for donations and to ensure that we are robustly considering ethical and reputational risks to our organisations.

9 **Who has access to your personal information?**

Your personal information is stored on our database, which is password protected and access to which is limited to some School staff and trusted subcontracted third parties.

We may pass your information to our third-party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (e.g. to process donations and send out mailings). When we use third-party service providers, we only disclose the information necessary to deliver that service and there will always be a contract in place to ensure your information is kept secure. We will not share or sell your data to third parties to use for their own purposes unless we are required to do so by law (e.g. by a court order or for the purposes of prevention of fraud or other crime).

Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the European Economic Area (EEA). This may occur if, for example, one of our trusted partner's servers are located in a country outside the EEA. These countries may not have similar data protection laws to the UK; however, we will take steps to ensure they provide an adequate level of protection in accordance with UK data protection law by the use of EU model contract clauses or, for

organisations that we work with who process personal information in the USA, verification that their data processing standards meet the EU-US Privacy Shield. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

10 **How we keep your personal information secure**

We ensure that there are appropriate technical controls in place to protect your personal details (e.g. our online forms are always encrypted, and our network is protected and routinely monitored).

We use a secure server when you enter into any money transaction from our website. We also take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up-to-date and is kept only for so long as is necessary for the purposes for which it is used.

Any payment details on paper donation forms are destroyed once the donation has been processed.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff and contractors.

11 **How long will we hold your personal information for?**

The DARO considers its relationship with alumni, donors and other stake-holders to be life-long. However, if, at any time, you want to review or stop entirely the communications we send to you, please contact us using the information in the **Introduction** section.

We will take into consideration our legal obligations, and tax and accounting rules, when determining how long we should retain your information. When we no longer need to retain your information, we will ensure it is securely disposed of, at an appropriate time.

If you have pledged a legacy gift, it will be necessary to retain your data until your gift is received so that we can identify the gift against the pledge.

12 **Your choices**

You have a choice about whether or not you wish to receive information from us. If you do not wish to receive direct marketing communications telling you about the latest alumni news, events and fundraising updates then please let us know at any time by using the information in the **Introduction** section.

We will not contact you for marketing purposes by post, email, phone or text message if you have told us you do not want to hear from us by any of those channels. If the telephone number we hold for you is registered with the Telephone Preference Service (TPS) then we will not contact you on that phone number except for administrative purposes.

If you unsubscribe from communications from us, from any or all of the communication channels mentioned above, we will update our records to stop further communication as quickly as we can. Due to some communications already being in progress at the point you opt out, please be aware that it can take up to six weeks for your preferences to be fully implemented.

We will only ever share your data in other circumstances if we have your explicit and informed consent.

13 **Right to be forgotten**

If you choose to opt out of receiving our communications, your data will be retained and marked to prevent you from receiving any communications.

If you want your data to be deleted from the database entirely, in most cases we will delete it. However, by deleting your data, we will be unable to guarantee that you will not receive communications in the future because we will have deleted your data and will therefore have no record of past requests from you. If you want to guarantee that you will not receive communications from us, it is in your best interest for your data to be retained on our system so that your contact preference is recorded and adhered to.

In some cases, we will be required to keep some or all of your data on record for legal or accounting purposes. For example, if you have made a donation, we will be required to keep the donation details for a minimum of seven years from the donation. If you have completed a Gift Aid declaration, we will be required to keep your details in order to claim the Gift Aid on your donation. In these cases, we will anonymise as much of your data as possible until it can be deleted.

14 **Keeping your information up-to-date**

The accuracy of your information is important to us. You can update your information with us, including your address and contact details, at any time. If you would like to change your preferences or update the details we hold about you, please contact us using the information in the **Introduction** section.

15 **Your rights**

You have the right to:

- Request a copy of the information we hold about you
- Update or amend the information we hold about you if it is incorrect
- Change your communications preferences at any time
- Ask us to remove your personal information from our records
- Object to the processing of your information for marketing purposes
- Raise a concern or complaint about the way in which your information is being used.

If you wish to discuss anything in this privacy policy, find out more about your rights, or obtain a copy of the information we hold about you, please contact us using the information in the **Introduction** section.

16 **Children and privacy**

We take the protection of children very seriously. To that end, we require that children under 16 do not submit any information to our website without the consent of a parent or guardian. We will not knowingly request or collect from a child any information online that can be traced to the child, such as an email address, name or information about the child's family. Unless a parent or guardian consents to such use in advance, we will not knowingly use information that a child provides to us for any fundraising or promotional purpose.

17 **Vulnerable circumstances**

We recognise the importance of protecting our vulnerable supporters and follow the guidance issued by the Institute of Fundraising on treating donors fairly⁶. We believe this helps to support our staff and fundraisers who come into contact with supporters in providing high quality customer care, ensuring anyone donating to the School is in a position to make a free and informed decision.

18 **Complaints, compliments or comments**

If you are unhappy with your experience of the School, with something that we have done or failed to do, we want to know about it. We also welcome your views on what we do well. Your comments enable us to learn and continuously improve our services. If you would like to make a complaint, compliment or comment then please contact us using the information in the **Introduction** section.

Review of this Privacy Policy

We change this privacy policy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the School's website or by contacting you directly.

Policy last reviewed by:	Kathrin Ostermann (Director of Development and Alumni Relations) and Susy Ralph (Data Coordinator)
Date last reviewed:	July 2019
Approved on behalf of Governors by:	Board of Governors
Date approved:	11 December 2019

⁶ For further information on treating donors fairly, please see the Institute of Fundraising [website](#).