



## Pate's Grammar School

<b>Approved by:</b>	Head Master	<b>Date:</b> September 2021
<b>Last reviewed on:</b>	September 2021	
<b>Next review due by:</b>	September 2023	

### Privacy notice for alumni, friends and supporters

The privacy of personal data of our alumni, friends and supporters is important to Pate's Grammar School. This notice specifically relates to personal data processed by the Development Office in its work to build a more vibrant, engaged community. The Development Office at Pate's has responsibility for alumni relations, events, and fundraising and charitable giving to the School. The following notice sets out how the Development Office uses your data.

We are committed at every level to making sure that our communications with you are considered and welcome. All personal data is held and processed in accordance with the General Data Protection Regulations.

Pate's Grammar School is the 'data controller' for the purposes of data protection law.

Our data protection officer (DPO) is Stephen Locke (see 'Contact us' below).

Any personal data is stored securely, with access restricted to authorised personnel only. Most information that we hold will have been obtained directly from you or from archived records of your time at the school.

### The personal information we hold

Personal information held and processed by the Development Office may include:

- Biographical information including your name, gender and date of birth
- Your contact details and communication preferences
- Your education history
- Your professional activities and employment
- Your extra-curricular activities when you were at school
- Information from articles in the media
- Your volunteering activity for the School including alumni volunteering
- Your relationships with other Pate's alumni
- Your donation records and gift aid status
- Records of communications and interactions we have had with you
- Your attendance at School events
- any dietary requirements for catering purposes that you have provided
- any disability which you may have so that we may make reasonable adjustments for

you

Please note that we do not collect or store any credit/debit card details.

## **Why we use this information**

This information is used by the School to support a full range of activities for our alumni and friends and to ensure that the ways in which we communicate with you, such as sending out School publications, inviting you to events, or advising you about our alumni benefits and fundraising priorities, are relevant and adhere to your chosen communication preferences.

Here are some further examples of our activities for which we may use your personal data:

- General administration (e.g. event management, processing of donations, internal record keeping);
- Seeking non-financial support (e.g. careers advice to students, sharing of expertise);

## **The lawful basis on which we use this 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 consent applies (in which case see below). 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;
- promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money for the school;
- using your personal information to administer our events;
- safeguarding and promoting the welfare of our pupils with whom you may be in contact e.g. if you arrange work experience or mentor a pupil;

If you object to us using your information where we are relying on our legitimate interests as explained above please speak to the DPO.

### **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 DPO.

### **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 an event 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.

## **Special Personal Information**

The School's grounds 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.

These two conditions may also apply if we ever need to process information about criminal convictions and offences.

## **Collecting this information**

We hold information that may date back to your original school records. Alternatively we may store information that you have voluntarily given to us through more recent communication or given to the Pate's Society.

### **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 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 will 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 School. 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, 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 DPO. Our records retention policy sets out how long we keep different types of information. If you wish to see a copy of this, please contact the DPO.

## **Data Sharing**

Data will not be disclosed to external organisations other than those acting as agents for the School with whom the School has data sharing agreements. The School does not sell or swap any of its data to third party organisations and does not permit its agents to provide its data to third parties.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with the Pate's Society, our alumni organisation or suppliers and service providers - to enable them to provide the service we have contracted them for, such as communication and database platforms.

## **Transferring information internationally**

Where we transfer personal information to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

## **Your rights**

### **How to access the personal information we hold about you**

Individuals have a right to make a 'subject access request' to gain access to personal information that Pate's Grammar School holds about them.

You may also have a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our DPO.

### **Your other rights regarding your information**

Under data protection law, individuals have certain rights regarding how their personal information is used and kept safe. You have the right to:

- Object to the use of your personal information if it would cause, or is causing, damage or distress
- Prevent your information being used to send direct marketing
- Object to the use of your personal information for decisions being taken by automated means (by a computer or machine, rather than a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our DPO.

If you request that we stop processing your data, we will remove personal data with the following exceptions:

- your name and years of entry and leaving alongside your request to remove your data. We will retain this information to prevent you from being inadvertently contacted in the future.
- information needed to comply with statutory requirements, but only for as long as those statutory requirements specify (e.g. Gift Aid declarations)

Our communications are by phone, email and post in order to achieve our role in the most cost effective way. You can change your communication preferences at any time by post (Development Office, Pate's Grammar School, Princess Elizabeth Way, Cheltenham, GL51 0HG), email ([alumni@patesgs.org](mailto:alumni@patesgs.org)) or telephone (01242 538283).

## **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>

## **Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

Stephen Locke

Pate's Grammar School

Princess Elizabeth way

Cheltenham

GL51 0HG

01242 538252

[slocke@patesgs.org](mailto:slocke@patesgs.org)