

# Stephen Perse

Foundation

## Privacy Notice for Alumni, Donors and Supporters

### Introduction

This privacy notice is intended to provide information about how we will use (or "process") Personal Data about our alumni, donors and supporters for the purposes of maintaining a lasting, usually life-long, relationship with the Stephen Perse Foundation (the **School**). For information about how the School uses your Personal Data more widely (for example, in relation to being a current parent, a pupil or in relation to employment) please see the School [website](#).

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how your data is used and to explain how you can control the way in which the School uses that data and what actions you can take if you would like to change the way in which your data is being used.

This Privacy Notice applies alongside any other information the School may provide about a particular use of Personal Data, for example when collecting data via an online or paper form or in correspondence.

This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including our Data Protection Policy, Information and Records Retention Policy and IT policies.

### Responsibility for Data Protection

The School's Chief Compliance Officer deals with all day to day requests and enquiries concerning the School's use of Personal Data (see section on Your Rights below).

### Who we are

Our Development Team, part of the Development, Communications and Admissions Office, exists to maintain and grow a lifelong relationship between the School and its alumni (who include past students and past parents), donors and other supporters. It aims to foster support for and pride in all that the School seeks to achieve and the personal achievements of the School's alumni, who are an inspiration to our students. We are here to help you stay connected with each other and with the School. We also fundraise to ensure that, thanks to the incredible generosity of our donors, the world-class education that we offer can be shared as widely as possible through offering bursaries, scholarships, outreach and community projects and other innovative programmes.

### What is "personal information"?

Personal information is information that identifies you as an individual and relates to you.

This includes your contact details, education history, employment, interests and financial information. This also includes details of our ongoing relationship and your engagement with us (which will depend on the frequency and nature of your interactions and engagement with us), information about your giving, information relating to your willingness or financial capacity to support our charitable objectives.

## Our legal bases for using your information

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

The two tables below contain a general description of the different legal bases:

### Legitimate interests ("LI")

This means that the School is using your information when this is necessary for the School's legitimate interests except when your interests and fundamental rights override our legitimate interests.

Specifically, the School has a legitimate interest in:

- protecting the School's reputation;
- facilitating the efficient operation of the School;
- ensuring that all relevant legal obligations of the School are complied with; and
- taking appropriate steps to maximise the resources available to us to fulfil our charitable objectives .

In addition, your personal information may be processed for the legitimate interests of others.

### Legal obligation ("LO")

Where the School needs to use your information in order to comply with a legal obligation, for example for reclaiming Gift Aid on your donations or responding to the Charity Commission or the ICO, for example in relation to audits or official investigations. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

### Performance of a task carried out in the public interest (or carrying out public tasks) ("PI")

The following are examples of when we use your information to perform tasks in the public interest:

- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

### Consent

Where the School is relying on consent as a means to process Personal Data, any person may withdraw this consent at any time. Please be aware however that the School may have another lawful reason to process the Personal Data in question even without your consent.

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.

### Substantial public interest ("SPI")

The School is also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above.

#### Legal claims ("LC")

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers.

### **How and why does the School collect and use personal information?**

We set out below examples of the different ways in which we use personal information and where this personal information comes from. The letters highlighted in different colours below refer to the legal bases we are relying on. Please see the section above for an explanation.

#### 1. For alumni and supporter engagement

- To manage our ongoing relationship with you and to provide a record of your interactions and contributions to the School and its wider community - LI;
- To offer and manage a varied programme of events tailored to your interests, including networking events, reunions, dinners, sports events and concerts - LI;
- To keep you up to date with news from the School or other areas in which you have shown an interest, e.g. by making a donation or attending an event - LI;
- To provide you with information about alumni benefits and services - LI;
- To let you know of volunteering opportunities, careers advice and internships, or speaking opportunities - LI, PI;
- To provide the most relevant content and best possible user experience when you are interacting with our digital communications and platforms - LI;
- To identify and profile potential volunteers, alumni ambassadors and event attendees - LI;
- To accept and process commercial revenue, e.g. for merchandise or event tickets - LO;
- To undertake surveys and market research - LI;
- To create classifications and groupings (through manual or automated analyses) in order to best direct engagement activities - LI;
- To analyse the success of our engagement activities, collect feedback, and manage complaints - LI, PI, LC.

#### 2. For all fundraising and donor stewardship

- To help ensure that our fundraising efforts are conducted as efficiently as possible, and that our approaches to potential donors are respectful, professional, and made, as far as possible, based on evidence and an understanding of what may interest you - LI;
- To ask you for your support for our fundraising programmes, always mindful of fundraising best practice, and according to the fundraising promise - LI;
- To accept and process philanthropic revenue - LO;
- To provide acknowledgement, recognition and stewardship of your gift - LI;
- To inform you of the impact of your gift - LI;
- To create classifications and groupings (through manual or automated analyses) in order to best direct fundraising activities - LI;
- To support peer-to-peer fundraising campaigns - LI;
- To inform fundraising, marketing and donor stewardship strategies - LI.

#### 3. For fundraising for major gifts

- In addition to analysing data shared with us, we may use publicly available information and recommendations from staff and supporters to identify individuals who we believe may have the interest and financial capacity to make a major gift - LI;

- Where we have reason to think a potential donor may possess an interest and financial capacity to donate, we may research and collate additional information from sources in the public domain, typically concerning a potential donor's interests in so far as they may coincide with our work, their philanthropic activity, financial capacity and networks in order to substantiate this. We may undertake this research ourselves or use the services of a third-party partner. This new information may be added to the record of a donor or potential donor - **LI**;
  - Where this activity is being undertaken for a new contact with whom we have no previous relationship, we will provide the individual with a link to this privacy notice as part of our initial engagement - **LO**;
  - Information may be collated into a briefing or profile in order to assist the planning of an approach to a potential donor to discuss that individual's interest in our work and in supporting it - **LI**;
  - We may also carry out due diligence on potential donors using publicly available information in order to comply with our policy on the acceptance of gifts, and to fulfil our legal responsibilities - **LO, LC**.
4. For operational reporting, management reporting, and governance
- We may use your personal data for the purposes of operational reporting, to produce management information, and for other relevant purposes relating to the governance of the School. We will use only the data required and, unless necessary, we will use anonymised or pseudonymised data - **LI, LO, LC**
5. In our external communications
- With your permission, we may publish your name in an online directory, in donor listings, as part of a guest list, or we may work with you to create press releases or case studies to be included in our publications or on our websites.

If you do not wish your data to be used in any of the ways listed above, or have any questions, please contact us at [development@stephenperse.com](mailto:development@stephenperse.com).

Communications may be sent by post, telephone or electronic means (principally email), depending on the contact details we hold, and the preferences expressed about the types of communications used. In addition to our general principle of adopting legitimate interest as the legal basis for data processing, the Privacy and Electronic Communications Regulations 2003 (PECR) apply to electronic fundraising communications.

#### **More than one basis**

In some cases we will rely on more than one basis for a particular use of your information - for example, in relation to volunteering opportunities. In addition, the basis that we will rely on for a particular purpose may vary depending on the circumstances or we may move from one of the legal bases listed above to another as circumstances change. For example, we may rely on legitimate interests to contact you in relation to an event or fundraising appeal and then rely on legal obligation to process any donation you have made.

#### **Types of personal data processed by the School**

Based on information which you provide to us and, in some cases, publicly available information we may record:

- Biographical information, including your name, gender and date of birth
- Your contact details and communication preferences
- Your education history including information about your time at the School and the dates you attended
- Your professional activities and employment
- Your interests
- Your family details and network
- Information you have publicly shared on social media
- Your relationships with other School alumni including your year group
- Your donation history and Gift Aid declaration (if required)
- Records of communications and interactions we have had with you
- Your attendance at School events
- Whether you are a trustee of a grant-giving charity or have previously donated to similar charities, or raised funds for charitable purposes, in addition to your interest in Education
- Case studies and photographs (for which your permission will always be sought)

We do not collect or store any credit/debit card details.

### **How the School collects personal data**

Generally, the School receives Personal Data from the individual directly. A significant proportion of the information we hold on alumni, donors and supporters comes from them (for example, by filling in a form, or by corresponding with us by telephone, email or otherwise). Some pupil data held in the School's pupil database will be transferred to the School's alumni database.

In some cases, we may supplement the information you have given us with data from elsewhere. Examples include adding demographic data to our alumni, donor and supporter information and improving or correcting contact details. Sources of data could include publicly available sources – for example, Companies House, the Electoral Register and the media/social media – to help us to understand more about you and your ability to support the School.

Any research that we undertake is to improve our understanding of our alumni, donors and supporters to help inform our fundraising and target our communications more effectively. This ensures that any approaches and communications are tailored and appropriate to individual interests and preferences.

### **Who has access to the personal data and who we share it with**

For the most part, Personal Data collected by the School will remain within the School and will be processed by appropriate individuals only on a 'need to know' basis. Occasionally, the School will need to share personal information relating to its community with third parties, such as professional advisers and specialist service providers (e.g. mailing houses, fundraising consultants). Where third parties are engaged they will be required to confirm their compliance with Data Protection Law.

The School may also be required to share your data with third parties where required to do so by law. For example, if you Gift Aid a donation, then we are required to tell HMRC the name, address and postcode of the donor and the date and amount of the donation.

We do not sell to or swap any of our data with third party organisations and do not permit our agents to provide our data to third parties.

### **Sending information to other countries**

When the School sends Personal Data outside of the UK, we have to consider if the other country has the same level of protection for Personal Data as there is in the UK. Some countries are considered by the UK Government to have adequate rules and this includes all of the European Economic Area and some other countries, such as, New Zealand, Argentina and Japan.

In certain circumstances, we may send your information to countries which the UK Government does not consider to have the same level of protection for Personal Data as there is in the UK. For example, we may store your information on cloud computer storage based in the USA.

We can provide you with details about where we are sending your Personal Data, whether the country has an adequacy decision and if not the safeguards which we have in place outside of this Privacy Notice. If you have any questions about the safeguards that are in place please contact the Chief Compliance Officer.

### **For how long do we keep your information?**

Relationships between alumni and a school are usually life-long relationships, and so we expect to keep your data for as long as that relationship exists.

Should you wish to limit or object to our use of your Personal Data, or would like further information, please contact the Development Office. However, the School may need to retain some of your details (for example, to ensure that no more communications are sent to a particular address, email or telephone number, or to you at all).

### **What decisions can you make about your information?**

Data protection legislation gives you a number of rights regarding your Personal Data:

- **Rectification:** if Personal Data is incorrect, you can ask us to correct it.
- **Access:** you can also ask what Personal Data we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this Personal Data, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the Personal Data that we hold about you in certain circumstances. For example, where we no longer need the Personal Data.
- **Portability:** you can request the transfer of your Personal Data to you or to a third party in a format that can be read by computer. This applies where (a) the data has been provided by you; (b) the basis that we are relying on to process your data is consent or contract (please see "Our legal bases for using your information" above); and (c) the data is being processed by us on a computer.
- **Restriction:** our use of Personal Data 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.
- **Object:** you may object to us using your Personal Data where:
  - a. we are using it for direct marketing purposes (e.g. to send you information about an event the School is holding); and
  - b. we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of you at a School event for historical reasons.

Any individual wishing to access, erase, restrict processing, obtain, object or amend their personal data, should put their request in writing to the Chief Compliance Officer.

The School will endeavour to 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. The School will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, the School may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.

You should be aware that certain types of data are exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege.

### **Data accuracy and security**

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. You should notify the Development Office of any significant changes to important information, such as contact details, held about you.

You have the right to request that any out-of-date, irrelevant or inaccurate or information about you is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the School may need to process your data, and how to contact us if you disagree.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies concerning the use of technology and devices, and access to school systems. All staff and governors will be made aware of these policies and their duties under Data Protection Law and receive any necessary relevant training.

### **This Policy**

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as reasonably practicable.

### **Queries and Complaints**

Any comments or queries regarding this Privacy Notice should be directed to the Chief Compliance Officer using the following contact details: The Chief Compliance Officer, The Stephen Perse Foundation, Union Road, Cambridge, CB2 1HF.

If you consider we have not complied with this Privacy Notice or acted otherwise than in accordance with Data Protection Law, you should notify the Chief Compliance Officer. You can also lodge a complaint with the Information Commissioner's Office (**ICO**) - [ico.org.uk](http://ico.org.uk) - although the ICO recommends that steps are taken to resolve the matter with us before involving them.

**October 2024**