



Privacy Notice for Alumni, Friends and Donors

Policy date:	March 2024
Date of next review:	March 2025
Owner:	Chief Operating Officer
SLT committee to review:	SLT
Intended audience:	Alumni, friends and donors
Location:	School Portal and website

1. Alumni, friends and donors Privacy Notice

- 1.1. This document explains how the School will gather, use and store your personal data for the purposes of Development and alumni relations.
- 1.2. Haileybury is a registered charity, number 310013. If you have any questions regarding your data, or wish to update your contact preferences, you can contact us at development@haileybury.com or on 01992 706495. The person with ultimate responsibility for data protection at the School is the Chief Operating Officer, who can be contacted at dataprotection@haileybury.com, or on 01992 706216.

2. What personal data will we store?

- 2.1. The Development Office works to maintain and promote relationships between the School and former pupils, former staff and parents, and friends of the School. We also carry out fundraising in support of the School's objectives.
- 2.2. To make this work possible, we will hold an individual record for every person that we are in contact with. This record may include: your name and any previous names, your gender, your date of birth, your contact details, your marital status, your relationship with the School, other institutions where you have studied or worked and what you did there (for example, your university and your degree), notes of friends or family who have a connection with the School, details of your hobbies and interests, lists of any donations that you have made to the School, details of all communications between us, a record of alumni events that you have attended, and a record of your communication preferences.
- 2.3. Your record may also contain notes that summarise any additional information that you may have told us (for example, about your time at school), any background research that we may have carried out as part of our fundraising activities, and information that may have been shared by one of your peers.
- 2.4. We may occasionally hold sensitive information about you: for example, if you have food allergies or access requirements, we will record this to help us meet your needs when you attend events.

3. How do we collect your data?

- 3.1. We may collect data in the following ways:
 - by transferring basic details from the School's main database (for example, when you leave School) or from our archives or other internal records;
 - by asking you for data, which we may do via a form, or verbally;
 - by recording any data which you give us during any communication with us, including your attendance at events, or when you donate to the School;
 - by carrying out background research using publicly available sources of information;
 - by noting data volunteered by your peers.

- 3.2. We use analytical tools (such as Google Analytics) to track use of our website, and to monitor the electronic communications that we send out (for example, by tracking whether emails are being opened, and which stories are most likely to be read, to help us work out which kinds of information are most interesting to alumni).

4. What is our lawful basis for processing your data?

- 4.1. Every organisation that processes data must have a valid lawful basis for doing so. The basis we use for processing your data will depend on your relationship with us, as explained below.

5. Former pupils and staff

- 5.1. It is reasonable to expect that any individual who has been a pupil or member of staff at the School will be interested in receiving occasional news updates, and will have an interest in hearing about events that are relevant to them - for example, a reunion of their former classmates. It is also reasonable to expect that former pupils and staff will be supportive of our activities in pursuing our charitable purpose. We will, therefore, rely on the basis of legitimate interest to contact former pupils or staff who have never been asked for permission to stay in touch.
- 5.2. However, we wish to ensure all communications are in line with the wishes of the individual, and we will therefore ascertain your communication preferences, as the opportunity arises. In addition, where an individual has not given any indication that contact is welcome for a period of five or more years (for example, by responding to a communication from us), and where we can therefore no longer be confident of the accuracy of the contact details that we hold, we shall make one final attempt to make contact with you, after which time we shall await direct contact from you.

6. Former parents

- 6.1. We rely on consent to process your data. We shall seek permission to stay in touch when your child leaves the School. If we do not have your permission, we shall not contact you from the Development Office.

7. Donors

- 7.1. Where a donor does not fall into any other category, we will process your data on the basis of legitimate interest, to ensure we meet all legal requirements for donations.

8. Friends of the School

- 8.1. Friends of the School may fall into two main categories:
- those who have a previous direct and personal connection with the School (for example, as a former Governor); or
 - those who are likely to have an interest in the School because of their own current or former position.
- 8.2. We will process the data for these individuals on the basis of legitimate interest.

9. How will we use your data?

9.1. We might process your data under several different categories. We might use it to make contact with you for:

- sharing news about the School and its community;
- promoting events at Haileybury;
- passing on details of goods and services that may be of interest - for example, this might include Haileybury merchandise, or sharing details of a promotion with benefits for Old Haileyburians;
- asking for your help, perhaps by providing careers advice to current pupils, or hosting alumni events in your area;
- asking you to support us by making a donation;
- asking you to check and update your contact details and communication preferences;
- general communications - for example, passing on a message from an old school friend or colleague who would like to get back in touch with you.

9.2. We might also process your data internally to:

- carry out analysis of our community to help us ensure our activities are relevant - for example, working out which geographical areas are home to large numbers of alumni, so that we can arrange events in those areas, or finding out which proportion prefer to be contacted by a certain means, so that we can adapt our communications programme;
- carry out research (sometimes known as profiling) on an individual, and storing the results - we may typically do this before we approach someone that we hope may be able to make a donation to the School. This may also include wealth screening (please see below). We might share your data with other companies or organisations contracted to carry out work on our behalf, such as:
 - a mailing house used to send out a newsletter; or
 - a fundraising company contracted to run a telephone fundraising campaign.

9.3. We will not sell your data, or pass it to any organisation for any purpose other than for assisting us in delivering our development and alumni activities. We will satisfy ourselves that their data processing is secure, and will transfer the data to them by secure means.

10. Wealth screening

10.1. Occasionally the School's Development Office may use wealth screening services that analyse publicly available data about potential donors to create a profile of interests and preferences so that they can focus their communications about fundraising and volunteering in the most effective way. If you would prefer us not to use your data in this way or if you have enquiries about this, please contact Amy Ledingham, Director of Development at a.ledingham@haileybury.com.

11. How will we store your data?

- 11.1. Your data is held on a specialist development database known as “Raisers’ Edge”. This database is protected. Access is restricted to individuals who need to see the data to carry out their duties, and to our IT support team for essential technical support. 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, the servers used by a trusted supplier are located in a country outside the EEA. Where these countries do not have similar data protection laws to the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law.
- 11.2. Data may also be held in hard copy format within the Development Office and the School Archives. Some records are held long term (for example, admissions registers compiled prior to the introduction of computer systems) and some may be temporary or short term (for example, details of event attendees during planning for an event). These records are kept in secure locked storage at all times.

12. How long will we keep your data?

- 12.1. Old Haileyburians and former staff often wish to continue a lifelong association with their school, and it is common for them to contact us many decades after leaving us. We also maintain an archive for future reference and research, for example, in the event that an Old Haileyburian becomes famous in later life, or a relative wishes to view their records after their death.
- 12.2. Records for former pupils and staff will be held permanently unless the individual exercises the right to be forgotten. Details of former parents will only be held by the Development Office if consent to remain in contact is given in writing. Records will be held until consent is withdrawn, or if we do not hear from you for a period of five or more years.
- 12.3. Details of donors must be retained as part of our financial records for a minimum of six years - for example, in case of a Gift Aid audit by HMRC. Donors who are also a former pupil, staff member, parent or friend of the School will have details of their donations to us stored permanently on their individual record. Details of individual donors who have no other connection with the School will be deleted after a period of ten years.
- 12.4. Details of friends of the School will be retained in line with their relationship to us. Details of any individual who has had a previous personal relationship with the School will be retained permanently. Details of those who have a relationship with us by virtue of their position will be retained only for as long as they hold that position.

13. Photography

- 13.1. When attending school events, it is understood that attendees give Haileybury permission to take photographs at the event, and that the images and any reproductions and adaptations may be used for marketing and publicity purposes. This might include, but is not limited to, the right to use them in the School’s printed and online publicity, social media and press releases.

14. Your rights

14.1. Your right to access and correct your data

You have the right to know what data we hold about you, to verify the lawfulness of the basis we are using to process your data, and to correct inaccuracies or omissions. You can submit a request to view the data we hold about you and we will respond within one month. In almost all cases, this will be free of charge. If your data is especially complex, it may take us longer to supply your information, but we will let you know within one month if this is necessary.

14.2. Your right to control how we communicate with you

You have the right to choose which communications you receive from us. For example, you may wish to hear about events and fundraising, but not about goods and services. You also have the right to choose how we will communicate with you. For example, you may be happy to receive communications by email, but not by text message. Whenever we ask you to update your details, or give your permission to keep in touch, you will have an opportunity to update these choices. You can also update your choices at any time by contacting us on 01992 706 495 or at development@haileybury.com.

14.3. Your right to be forgotten, or to restrict the use of your data

Any individual may exercise the right to be forgotten. In most cases, it will be necessary to retain a very brief record. A pupil's attendance at the School is a matter of historic record, and required for statistical and organisational purposes. In these cases, sufficient data will be retained to ensure these purposes can be met, but will be limited to: name, date of birth, their House and years of attendance at the School.

We are legally obliged to retain the details of those who have made donations to the School for a period of six years. If an individual exercises the right to be forgotten during this period, we will retain their name and address, the amount of their donation, and details of any Gift Aid claimed.

In other cases, the individual's personal details will be removed entirely from the Development Office records, but may be retained in other parts of the School (for example, it is necessary for the School to maintain a record of staff previously employed). If you ask us to restrict the use of your data, we will store it but will not use it for any other purpose.

15. Finding out more

15.1. This is a summary of how we will manage your data under the requirements of the General Data Protection Regulations that are most relevant to the activities of the Development Office. A complete guide to the Regulations can be found on the website of the Information Commissioner's Office: <https://ico.org.uk>.

15.2. You can contact us at any time to find out more about the data we hold about you, or about how we process it, on 01992 706495, or at development@haileybury.com.

Version history		
Date	Reviewed by	Notes
February 2021	Deputy Bursar/ Director of Development	New policy
March 2023	Chief Operating Officer/ Director of Development	Updated
March 2024	Chief Operating Officer / Director of Development	Reviewed and updated