



**Merchant Taylors'**  
School

## **How we use your Information: Development and Alumni Relations Privacy Notice**

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|----------------------------------|---|
| Policy Owner:                    | Mr M Brodrick (Data Protection Officer)   |
| Type of Policy:                  | GDPR   Statutory  |
| Regulatory Body:                 | Information Commissioner's Office (ICO)   |
| Relevant Legislation / Guidance: | UK General Data Protection Regulation (UK GDPR)<br>Data Protection Act 2018   |
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| Linked Policies:                 | <ul style="list-style-type: none"><li>• Overarching Data Protection Policy</li><li>• Appropriate Policy Document</li><li>• Article 30 Record (Record of Processing Activities)</li><li>• Information and Records Retention Policy</li><li>• Data Subject Access Request Policy (DSAR) – General</li></ul> |

## How we use your Information: Development and Alumni Relations Privacy Notice

### Introduction

This notice explains **how** and **why** the Development Office uses personal data about you when carrying out our fundraising and development activities.

This notice also outlines **what we do** with your personal data and what **decisions** you can make about your personal data in relation to fundraising and development.

If you have any questions about this notice please contact the Development Manager via [devoffice@merchanttaylors.com](mailto:devoffice@merchanttaylors.com). You can also contact the Development Office on +44 151 949 9351 in relation to any of the matters set out in this notice.

The Old Boys' and Old Girls' Associations (OBA & OGA) form part of the School and the Development Office manage your personal data on behalf of the OBA/OGA. As the OBA/OGA are part of the School, the School is responsible for how it, and the OBA/OGA, use your personal data. To use data protection terminology, the School is the "data controller".

This notice only covers how the School uses your personal data for fundraising and development purposes. For more information about how the School uses your personal data more widely (for example, in relation to educating pupils) please ask the Development Office for a copy of the appropriate privacy notice. The Development Office can be contacted via [devoffice@merchanttaylors.com](mailto:devoffice@merchanttaylors.com).

### What is personal data?

Personal data is information about you from which you can be identified (either directly or indirectly).

This includes your contact details, your relationship with the School and financial information.

### What personal data does the School hold about you and how is this obtained?

We receive information about you from other teams within the School but only where this is relevant to our work. For example, we obtain information from the Admissions Office about the dates when you attended the School and also your address details. We hold a specific database with information about alumni, parents, staff, former parents, former staff and other supporters.

You provide us with information about yourself during the course of our relationship with you. For example, when you sign up to receive communications from us or order tickets for events.

In addition, we will obtain your personal data from other sources, which we use for the purposes described below. For example, members of your family and other alumni might tell us about your interests or your career.

The School may receive information about you from the OBA or OGA from events you attend.

We will hold information such as:

- your name, gender, and date of birth;
- information about your family, for example, whether you have any brothers or sisters who attended the School;

- any connection you may have with other members of the School community such as other alumni;
- the dates when you or your child attended the School (if applicable);
- if you are a former staff member the dates when you worked at the School;
- your contact details;
- information about your achievements and interests e.g. which sports team you were part of as a pupil or any hobbies that you have now;
- where you attended university and your occupation (if applicable);
- how you like to hear from us e.g. whether you have signed up to receive emails from us;
- your involvement with us. This includes correspondence with you, your attendance at our events;
- records of any donations and your Gift Aid status if applicable;
- information from articles in the media;
- medical information or information about a disability you have, e.g. to make adjustments for you or to help you if you are hurt whilst taking part in an activity;
- any dietary requirements for catering purposes; and
- any disability which you may have so that we may make reasonable adjustments for you.

### **Why do we use your personal data?**

We use your personal data in the following ways:

- to keep you informed about events and activities and in relation to your attendance at those events (for example, so that we can accommodate you if you tell us about any special needs or dietary requirements);
- to facilitate interaction between members of the School community for example, we provide an online portal to allow alumni to communicate. This can be found here <https://alumni.merchanttaylors.com>.
- to tell you about products sold to benefit the School such as clothing and sports goods;
- to keep you informed about what is happening at the School, for example, by sending you a copy of the School newsletter / magazine (Merchants' Tales);
- in connection with providing financial support to the School (including making donations to the School, specific campaigns, such as for a new sports centre, and requests for sponsorship);
- in connection with the other ways in which you might support the School (such as when you volunteer);
- in connection with any research we carry out. For example, we may ask you to complete a survey, provide feedback or join one of our focus groups.

We will contact you for the above purposes by email, telephone, social media, post or by text message but we will only do this where we are allowed to do so under data protection law (for example, we will usually need your consent before sending you an email about a fundraising

opportunity). If you tell us that you do not want to be contacted for any of these purposes then we will of course respect that.

If you wish to make a donation, particularly a donation of a substantial value, we may need to verify your identity and / or carry out financial due diligence on you. This may involve desk based research (eg google) using information already in the public domain. This is to comply with our legal obligations.

We will take photos or videos of you to use in our publicity or on our social media platforms and website. If we consider that the photo or video is more privacy intrusive then we may ask for consent first.

### **How and why does the School share your personal data with third parties?**

- If you use a third party platform to donate then we will receive information about you from them.
- If you attend one of our events, then we will share your personal data with event booking platforms such as trybooking.com.
- In accordance with our legal obligations, will share information with local authorities, the Independent Schools Inspectorate / Ofsted] and the Department for Education, for example, where we have any safeguarding concerns.
- On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders.
- We may also need to share information with our professional advisors. For example, we may share your personal data with our legal advisers for the purpose of obtaining legal advice.
- We will need to share information if there is an emergency, for example, if you are hurt whilst on School premises or at one of our events.
- We will share information with HMRC in connection with Gift Aid claims.
- We use contractors to help us with our work (e.g. a printing company for our literature) or where we store our database in the cloud.

The School may share information about you with the Old Boys' Association and Old Girls' Association as follows:

- your name, gender, and date of birth;
- information about your family, for example, whether you have any brothers or sisters who attended the School;
- any connection you may have with other members of the School community such as other alumni;
- the dates when you or your child attended the School (if applicable);
- if you are a former staff member the dates when you worked at the School;
- your contact details;
- information about your achievements and interests e.g. which sports team you were part of as a pupil or any hobbies that you have now;
- where you attended university and your occupation (if applicable);

- how you like to hear from us e.g. whether you have signed up to receive emails from us;
- your involvement with us. This includes correspondence with you, your attendance at our events;
- records of any donations and your Gift Aid status if applicable;
- information from articles in the media;
- medical information or information about a disability you have, e.g. to make adjustments for you or to help you if you are hurt whilst taking part in an activity;
- any dietary requirements for catering purposes; and
- any disability which you may have so that we may make reasonable adjustments for you.

### **Our lawful bases for using your information**

This section contains information about the lawful basis that we are relying on when handling your information.

#### **Legitimate interests**

This means that we are using your personal data 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 personal data for all of the purposes described except where we have asked you for your consent (in which case consent applies as the lawful basis). 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 and parents;
- promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money for the bursary fund or new buildings;
- using your personal data to administer our events;
- safeguarding and promoting the welfare of our current and former pupils with whom you may be in contact e.g. if you arrange work experience or mentor a pupil; and
- ensuring that we comply with our legal obligations.

If you object to us using your personal data where we are relying on our legitimate interests as explained above please speak to the Development Manager.

#### **Public task**

We rely on this basis (as well as legitimate interests) where we use personal data in order to look after those we are responsible for. For example, if we needed to carry out checks on someone before allowing them to mentor our pupils.

#### **Consent**

In some cases, we are processing your personal data because you have given us your consent to do so.

If we ask for your consent to use your personal data you can take back this consent at any time. Any use of your personal data before you withdraw your consent remains valid. To withdraw your consent please contact the Development Manager via [devoffice@merchanttaylors.com](mailto:devoffice@merchanttaylors.com).

### **Necessary for a contract**

We will need to use your personal data 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 a concert that you have purchased tickets for.

### **Legal obligation**

On some occasions we will need your personal data 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.

### **Sending your personal data to other countries**

If 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 Union and some other countries, such as, New Zealand, Norway, Switzerland and Argentina.

For example, the School sends your personal data to countries with adequate rules if we:

- use an event booking platform which stores your personal data on servers in Ireland.

In certain circumstances, we may send your personal data to countries which do not have the same level of protection for personal data as there is in the UK. For example, we may:

- store your personal data in cloud computer storage with servers in the USA.

We will provide you with additional details about where we are sending your personal data, whether the country has an adequacy finding 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 Development Manager.

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

We have an ongoing relationship with you and we would like you to be involved with the School for many years to come. For this reason, the Development Office keeps the majority of the personal data it holds about you indefinitely. For example, we keep your contact details so that we can continue to stay in touch with you. Similarly, we will retain information about your involvement with the School as this helps us tailor our communications to you both now and in future.

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 also keep some information indefinitely for archiving purposes (this is known as "archiving in the public interest" under data protection law) and for historical research purposes. This includes the School's legitimate interest in research; supporting long-term accountability; enabling the discovery and availability of the School's and the wider school community's identity, memory, culture and history; enabling the establishment and maintenance of rights and obligations and of precedent decisions; educational purposes; and commercial and non-commercial re-use. For example, we keep some old photos so that we have a record of what the School was like in the past. Information held in our archive may be made publicly available but this would only be done in compliance with data protection laws.

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 data is used by the School more widely please contact the Development Office.

Although the Development Office keeps the majority of your personal data for a very long time, there are some exceptions to this. Further information can be found in our Information and Records Retention Policy.

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

Data protection law gives you a number of rights regarding your information. Your rights are as follows:

- **Correction:** if information held about you by the School is incorrect or incomplete you can ask us to correct it.
- **Access:** you can also 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 about you, where it came from and who we have sent it to.
- **Deletion:** 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.
- **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 in certain circumstances.
- **Restriction:** you can request that we restrict how we use your personal data.
- **Object:** you may object to us using your personal data where:
  - we are using it for direct marketing purposes (e.g. to send you an email about a fundraising opportunity);
  - the lawful bases on which we are relying is legitimate interests or public task. Please see the section "Our lawful bases for using your information" above;
  - if we ever use your personal data for scientific or historical research purposes or statistical purposes.

The Development Manager can give you more information about your data protection rights. To exercise any of your rights you can contact The Development manager via [devoffice@merchanttaylor.com](mailto:devoffice@merchanttaylor.com).

### **Further information and guidance**

The Development Manager is the person responsible at our school for managing how we look after personal data and deciding how it is shared in relation to fundraising and development. The Development Manager can answer any questions which you may have.

Like other organisations we need to keep your personal data safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

If you fail to provide certain information when requested, we may not be able to provide the information or service you have requested. We may also be prevented from complying with our legal obligations.

You have a right to lodge a complaint with the Information Commissioner's Office - [ico.org.uk](https://ico.org.uk). If you do have any concerns about how we have handled your personal data we would kindly ask that you contact us via [dpo@merchanttaylor.com](mailto:dpo@merchanttaylor.com) in the first instance before you speak to the ICO so that we have an opportunity to put things right.