



## **FUNDRAISING AND DEVELOPMENT PRIVACY NOTICE**

### **Introduction**

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

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

If you have any questions about this notice, please contact the Director of Development, Gavin Mann, at [gmann@nlcs.org.uk](mailto:gmann@nlcs.org.uk).

If the Director of Development is not available, you can contact the Development Office at [development@nlcs.org.uk](mailto:development@nlcs.org.uk) in relation to any of the matters set out in this document.

The School works in close conjunction with the Old North Londoners' Association (ONLA). The Development Office runs ONLA activities on behalf of the ONLA. As such, this privacy notice covers the use of your personal data in connection with ONLA activities.

This notice just covers how the School uses your personal data for fundraising and development purposes. For more information about how the School uses your information more widely (for example, concerning the provision of education to students) please see the privacy notices available on the School [website](#).

### **What is personal information?**

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

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

### **What personal information 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. We hold a specific database with information about alumnae, parents, staff, former parents, former staff, and other supporters.

You provide us with information about yourself during 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 information from other public sources.

We will hold information such as:

- 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 student;
- 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, e.g., if you carry out mentoring of current students;
- records of any donations;
- your Gift Aid status if applicable;
- information from articles in the media;
- any dietary requirements for catering purposes that you have provided; and
- any disability which you may have so that we may make reasonable adjustments for you.

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

We use your information in the following ways:

- to keep you informed about School and ONLA events and activities and in relation to your attendance at those events;
- to facilitate interaction between members of the School community. The School uses Graduway to help alumnae to connect easily with each other for the purposes of networking, mentoring, and engaging with the alumnae community for careers, career-related events, etc;
- 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 newsletters, a copy of the School magazine (North Londoner) and the ONLA magazine (ONLine);
- in connection with providing financial support to the School. This includes, for example, bursaries, capital projects and the annual fund; and
- in connection with other ways in which you might support the School (such as when you volunteer).

We will contact you for the above purposes by email, telephone, post and by text message but we will only do this where we can do so under data protection law. If you tell us that you do not want to be contacted for any of these purposes, then we will of course respect that.

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

We seek parental consent to use student photographs and videos. However, parents should be aware that, in some circumstances, the law recognises students' own rights to have a say in how their personal information is used. Any use of information before consent is withdrawn remains valid. If you would like more information about how the School uses student photographs and videos please read the School's [Use of Pupils' Images and Names Policy](#).

We may use information from public sources to find out more about you. For example, we may use the information about you on your employer's website to find out more if we were thinking of inviting you to talk at a careers evening. We may also research your philanthropic profile so that we can tailor our fundraising communications to you. As part of this we will obtain information from the internet search engines, your employer's website, LinkedIn, Facebook, the media including journals and articles, Companies House website, the Charity Commission website and general information available in the public domain.

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 taking and retaining copies of your identification documents and obtaining your personal information from sources including those set out in the paragraph above. This is to comply with our legal obligations.

### **How and why does the School share your personal information 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 information with event booking platforms such as Ticket Source, etc.
- In accordance with our legal obligations, we will share information with local authorities, the Independent Schools Inspectorate, 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 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 are assisted by a small team of volunteers (which includes NLCS alumnae, governors, and current parents) but we will not share your contact details with them, or any other information which we consider to be confidential without your permission.
- 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. We also use third parties to send out communications on our behalf.
- We may also use trusted third-party providers to help us learn more about you through prospect research, as described in the next section.

### **How and why we try to find out more about you**

As a not-for-profit school that needs to raise money, we undertake in-house prospect research about potential donors and from time to time engage specialist agencies to gather information about you from publicly available sources. These sources would include, for example, Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives. Once we have collected this public information, we may choose to save relevant information such as your education and career history on our secure internal database. This helps with our fundraising approaches, enables us to offer careers and mentoring to students and alumnae, helps us find speakers and gives us the opportunity to create communities of interest with our alumnae.

We may also carry out prospect research using publicly available information to identify individuals who may have an affinity to our cause but with whom we are not already in touch. We also use publicly available sources to carry out due diligence on donors in line with the School's [Ethical Fundraising and Gift Acceptance Policy](#) and Anti-Money Laundering Policy to meet money laundering

regulations. If you would like more information about this, you can request a copy of the School's Anti-Money Laundering Policy by contacting the Senior School office.

From time to time, we will expedite this prospect research using a process known as 'wealth screening'. This process involves the School submitting identifying information about a large number of data subjects held on our database to specialist third-party partners to see whether they can match the record we hold with the publicly available information they hold on the data subjects.

This research helps us to understand more about you as an individual so we can focus conversations we have with you about fundraising and volunteering in the most effective way and ensure that we provide you with an experience as a donor or potential donor which is appropriate for you.

If you would prefer us not to use your data in this way or if you have any enquiries about this, please email us at [development@nlcs.org.uk](mailto:development@nlcs.org.uk) or call us on 020 8952 0912 and ask for the Development Office.

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

This section contains information about the legal basis that we are relying on when handling your 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 the purposes described above unless any of the alternative basis in the table below apply. Specifically, we have a legitimate interest in:

- ensuring that there is an active community of supporters that will benefit the School and members of the School community, such as current and former students 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 information to administer our events;
- safeguarding and promoting the welfare of our students with whom you may be in contact, e.g., if you arrange work experience or mentor a student; and
- ensuring that we comply with our legal obligations.

If you object to us using your information where we are relying on our legitimate interests as explained above, please contact the Director of Development.

#### 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 Development Office at [development@nlcs.org.uk](mailto:development@nlcs.org.uk).

#### Necessary for a contract

We will need to use your information 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.

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.

### The School's bases 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.

#### Substantial public interest:

The School is also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This will apply if we need to use special category data in connection with your attendance at one of our events. For example, if we need to make adjustments because of a disability you have.

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

We may send your information to countries that do not have the same level of protection for personal information as there is in the UK. For example, we may store your information on computer servers based overseas.

The European Commission has produced a list of countries that have adequate data protection rules. The list can be found here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en).

If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the European Union, Liechtenstein, Norway, and Iceland), then, in the absence of any other safeguards, it might not have the same level of protection for personal information as there is in the UK.

Where appropriate we may put in place additional safeguards, for example, if we are using a third party to process a payment then we may ask them to contract with us using model data protection clauses provided by the European Commission in the absence of any other appropriate safeguard. If you would like more information about the safeguards that are in place, please contact the Director of Development.

### **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. If you would like more information about this, you can request a copy of the School's Data Retention Policy by contacting the Senior School office.

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, students, and parents. For more information on how personal information is used by the School more widely please read the School's [Data Protection Policy](#).

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

From May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- **Rectification:** if the information held about you by the School is incorrect 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 what types of people 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 information to you or to a third party in a format that can be read by a computer in certain circumstances.
- **Restriction:** our use of information about you may be restricted to simply storing it 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 information where:
  - we are using it for direct marketing purposes (e.g., to send you the School magazine);
  - the legal bases on which we are relying is legitimate interests. Please see the section "Our legal bases for using your information" above;
  - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons.

The Director of Development can give you more information about your data protection rights. To exercise any of your rights you can submit your request in writing to the Director of Development at [gmann@nlcs.org.uk](mailto:gmann@nlcs.org.uk).

## **Further information and guidance**

The Director of Development is the person responsible at our school for managing how we look after personal information and deciding how it is shared in relation to fundraising and development.

Like other organisations, we need to keep your information 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.

This notice is to explain how we use your personal information. The Director of Development can answer any questions which you may have.

Please contact the Director of Development if:

- you object to us using your information for marketing purposes, e.g., to send you information about fundraising events. We will stop using your information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about you.

If you consider that we have not acted properly when using your personal information, you can contact the Information Commissioner's Office – [ico.org.uk](https://ico.org.uk)