

How we use your information: Education Trust and OE Club Privacy Notice

Introduction

This notice explains **how** and **why** your personal information is used when you support Epsom College, for example, when you make a donation or interact with the OE community.

Fundraising and development is led by the Education Trust which is part of the College. The Trust also works in close conjunction with the OE Club. Therefore, this privacy notice covers how the Education Trust and the OE Club use personal data.

This notice outlines **what we do** with your information and what **decisions** you can make.

Under data protection law, the College is the "data controller". That means that the College is ultimately responsible for how it, the Education Trust and the OE Club use your personal data. In this notice, "we" is a reference to all three. Although the College has ultimate responsibility, fundraising and development is carried out on a day to day basis by the Education Trust.

If you have any questions about this notice, please contact the Education Trust Director at karen.doyle@epsomcollege.org.uk. If the Education Trust Director is not available, you can contact the Education Trust at educationtrust@epsomcollege.org.uk or call 01372 821042, or write to Epsom College, College Road, Epsom, Surrey KT17 4JQ in relation to any of the matters set out in this document.

For more information about how Epsom College uses your information more widely (for example, in relation to the provision of education to pupils) please ask the Bursar for a copy of the appropriate privacy notice. The Bursar can be contacted as follows: Sarah.teasdale@epsomcollege.org.uk

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 College and financial information.

What personal information do we hold about you and how is this obtained?

You provide information about yourself when you interact with the College community, for example, when you sign up to receive newsletters or attend OE events.

The information held about you includes the following:

- the dates when you or your child attended the College;
- if you are a former staff member the dates when you worked at the College;
- your contact details;
- information about your achievements and interests e.g. which sports team you were part of as a pupil;
- where you attended university and your occupation;
- 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 assistance at events;
- records of any donations;
- your Gift Aid status if applicable;
- information from articles in the media;
- any dietary requirements for catering purposes; and
- any disability which you may have so that we may make reasonable adjustments for you.

How is your information used?

Your information is used in the following ways:

- to keep you informed about events and activities and in relation to your attendance at those events;
- to facilitate interaction between members of the College community. For example there is an online portal, OEs Connected, which allows OEs to communicate with each other. This can be found here <https://epsomcollege.alumni-online.com/frmMain.aspx?ReturnUrl=/> .
- to send you newsletters and magazines;
- when you make a donation to support the College (including for specific capital campaigns and bursaries); and
- in connection with the other ways in which you might support the College community (such as when you volunteer). For example, we facilitate a number of careers events for students involving OEs.

You may be contacted for the above purposes by email, telephone, post or by text message but only where this is permitted under data protection law. As an exception to this, we do not need consent before sending an email to a "corporate" email address. This means that if you have given us your work email address, we will not always need your consent before contacting you at that address. In all cases though, 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 taking and retaining copies of your identification documents and obtaining your personal information from the following sources: internet search engines, 192.com, the Charity Commission, Zoopla, Business Week and related media articles. This is to comply with our legal obligations.

We may use your personal information to build up a picture of how wealthy you are so that we can tailor our fundraising communications to you. We may use the following information for this purpose: your postal address, history of giving. We may also obtain information from third parties. We would provide further information before using your personal data as described in this paragraph.

We may take photographs or videos of you to use in our publicity or on our social media platforms and websites. We may occasionally get your consent first, if we consider this appropriate.

The activities of the Trust and the OE Club are intrinsically linked and we use a shared database. For example, the Trust and the OE Club have access to your name and contact details so that they can interact with you as set out in this privacy notice.

We use a Direct Marketing Association registered organisation help up check that we have an up-to-date address for you.

We would like to find out more about you from other sources to help make sure that communications to you are relevant. This will help us build up a picture of your job, hobbies, interests and preferences to enable us to tell you about events and opportunities which may be of particular interest to you. We obtain this information via publically available sources such as via internet search engines and magazine and newspaper articles. We may also find out about you if you post something on the OE College LinkedIn pages, or if another member of the College community tells us.

In addition, we may obtain your personal information from sources such as internet search engines, and related media articles. This is to help us comply with our legal obligations. For example, we may find out more about someone so that we can check that we are able to accept a donation from them.

How and why is your personal information shared with third parties?

- If you use a third party platform to donate then we will receive information about you from them. For example, should you make a donation through Virgin Money Giving, your name and the amount you have donated will be shared with us.
- We may share your information with event booking platforms that we use.
- In accordance with our legal obligations, we may share information with local authorities, school inspectors and the Department for Education, for example, where we have any safeguarding concerns.
- On occasion, we may need to share information with the police.
- We may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- We may need to share information if there is an emergency, for example, if you are hurt whilst on College premises or at one of our events.
- We may use contractors to help us with our work (e.g. a printing company for our literature)
- We will personally contact you if we receive a specific request from an OE to establish contact with you.

Our legal grounds for using your information

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

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 Education Trust Director at karen.doyle@epsomcollege.org.uk.

Legitimate interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to you.

Specifically, we have a legitimate interest in:

- ensuring that there is an active community of supporters which will benefit the College and members of the College community, such as current and former pupils and parents;
- promoting the objects and interests of the College. 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 pupils with whom you may be in contact e.g. if you provide careers advice to a pupil;
- ensuring that we comply with our legal obligations; and
- carrying out our marketing, fundraising and development activities. This is because such activities ultimately benefit the College and the wider College community through, for example, raising funds for the College and providing support for current and former pupils.

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

Necessary for a contract

We may 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 a concert that you want to attend.

Legal obligation

On some occasions, we may 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.

Substantial public interest

The College 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 medical condition or disability you have.

Other countries

We may send you information when you are overseas, including when you are in a country, which does not have the same level of protection for personal information as there is in the UK. For example, we may communicate with you when you are overseas if you are on holiday or if you live in a different country.

The European Commission has produced a list of countries, which have adequate data protection rules. The list can be found here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

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 check that they are contracting with us using model data protection clauses provided by the European Commission. If you would like more information about the safeguards that are in place please contact the Education Trust Director.

For how long do we keep your information?

We have an ongoing relationship with you and we would like you to be involved with what we do for many years to come. For this reason, the Education Trust and OE Club keeps the majority of the personal information 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 us 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 can also keep information about you for a very long time or even indefinitely if we are retaining it for archiving purposes (this is known as "archiving in the public interest" under data protection law). For example, we keep old photographs so that we have a record of what the College was like in the past.

The College may 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 College more widely please contact the Bursar.

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:

- if your information is incorrect you can ask us to correct it;
- 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 sorts of organisations we have sent it to in the course of providing you with OE services;

- 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;
- 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;
- our use of information 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; and
- you may object to us using your information where:
 - we are using it for direct marketing purposes;
 - the legal basis 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 Education Trust Director can give you more information about your data protection rights.

Further information and guidance

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 Education Trust Director can answer any questions you may have.

Please contact the Education Trust Director if:

- you object to the use of 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.