



The Abbey

The independent school for girls aged 3-18.

Fundraising, Marketing and Development Privacy Notice

The Abbey School, Reading



17 Kendrick Road, Reading, Berkshire RG1 5DZ
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Registered Charity No 309115. The Abbey School exists to educate academically able girls.



Fundraising and Development Privacy Notice

How we use your information:

Introduction

This notice explains **how** and **why** the School acting through the External Relations Office collects personal information about you when carrying out our fundraising, marketing 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 Head of External Relations whose contact details are externalrelations@theabbey.co.uk.

The School acts on behalf of the Abbey Alumnae and the Abbey School Reading Old Girls Association (ASROGA) known collectively as The Abbey Alumnae (TAA). The TAA are an integral part of the School and this notice covers how the TAA office uses your personal information. To use data protection terminology, the School is the "controller" or "data controller" of personal data processed by the TAA for the purposes described in this notice.

This notice covers how the School uses your personal data for fundraising, marketing and development purposes. For more information about how the School uses your information more widely (for example, in relation to the provision of education to pupils) please ask The Head of Finance and Resources for a copy of the appropriate privacy notice. The Head of Finance and Resources can be contacted at: finance@theabbey.co.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 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 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 may obtain your information from other sources such as LinkedIn, Zoopla, Bloomberg, Facebook, Twitter and media articles.

We may hold information such as:

- the dates when you or your daughter attended the School;
- 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;
- 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 mentoring of current pupils;
- records of any donations;
- records of Abbey product purchases;
- 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.

Why do we use your personal information?

We use your information 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 School community for example, we provide an online portal, called the Abbey Connect, to allow alumnae to communicate. This can be found here <https://abbeyconnect.co.uk>.
- to tell you about products sold to benefit the School such as clothing, sports goods, memorabilia;
- to keep you informed about what is happening at the School, for example, by sending you a copy of The Magnolia newsletter / development booklets / details of forthcoming events;
- in connection with providing financial support to the School (including making donations to the School, specific campaigns, such as for bursaries, a new sports centre, and requests for sponsorship, etc.); and
- in connection with the other ways in which you might support the School (such as when you volunteer).

We may contact you for the above purposes by email, telephone, 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 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 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 will take photographs or videos of you 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 will 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 will use the following information for this purpose: your postal address, history of giving and levels/depth of involvement with the School. We will also obtain information from other sources: these are Zoopla, LinkedIn, Bloomberg, The Times Rich-Lists, Facebook, Instagram, Twitter and media articles. We will only seek information that is publicly available and will date stamp and notate the source as and when we undertake any searches.

How and why does the School share your personal information with third parties?

- If you use a third party platform to donate then we may receive information about you from them.
- We may share your information with event booking platforms such as Raiser's Edge Online Express which is the School's contracted CRM database provider.
- In accordance with our legal obligations, we may 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 may 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 may 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 TAA. This is explained in more detail above.

Our legal grounds 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 of 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 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 information to administer our events;
- safeguarding and promoting the welfare of our 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 information where we are relying on our legitimate interests as explained above please speak to The Head of External Relations.

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 Head of External Relations at externalrelations@theabbey.co.uk.

Necessary for a contract:

We will 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 are able to send you tickets for a concert 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 which 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 which 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

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 Head of External Relations.

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 External Relations Office 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 the School as this helps us tailor our communications to you both now and in future.

We will 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 keep information about you for a 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 School was like in the past.

The School will 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 School more widely please contact the Head of Finance and Resources.

Although the External Relations Office keeps the majority of your personal information for a long time, there are some exceptions to this. Further information can be found in our records retention policy - www.theabbey.co.uk/policies

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 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 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 School publications and development & fundraising booklets);

- the legal bases on which we are relying is legitimate interests. Please see the section "Our legal bases for using your information" above;
- if we ever use your information for scientific or historical research purposes or statistical purposes.

The Data Protection Lead (DPL) 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 Head of Finance and Resources at finance@theabbey.co.uk.

Further information and guidance

The Data Protection Lead (DPL) is the person responsible at our school for managing how we look after personal information and deciding how it is shared.

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 DPL can answer any questions which you may have.

This privacy notice does not, and is not intended to, give you any rights which you did not already have.

Please speak to the DPL if:

- you object to us using your information for marketing purposes e.g. to send you information about school development, fundraising and marketing 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; or
- you would prefer that certain information is kept confidential.

If you fail to provide certain information when requested, we may not be able to perform our obligations under the contract we have entered into with you. We may also be prevented from complying with our legal obligations (such as to ensure the welfare of you and our pupils and staff at events).

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.

The DPL is the person responsible at our school for managing how we look after personal information and can answer any questions which you may have about how we use your personal information. The Head of Finance and Resources is responsible for strategic oversight of the Data Protection policies and actions. The Head of External Relations is responsible for oversight management of the Customer Relationship Management (CRM) database - Raiser's Edge: NXT.

Contacts

- The School Data Protection Lead can be contacted on dpl@theabbey.co.uk
- The Head of Finance and Resources can be contacted on finance@theabbey.co.uk
- The Head of External Relations can be contacted on externalrelations@theabbey.co.uk

Approved by The Abbey Community Committee – July 2018 (updated 3/6/19)



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