

Development and Engagement Privacy Notice

Development and Engagement

Brighton College is more than just a school – it is a community. The Development and Engagement Office offers a thriving programme of activity for current parents, past parents, Old Brightonians (past pupils and past staff) and friends of the school, which:

- creates opportunities for our current pupils to benefit from the expertise of our school community, enriching their education and informing their future plans
- facilitates our network of Old Brightonians, helping them to keep in touch with their school friends and teachers, socialise and network professionally
- organises social and cultural events for current* and past parents all over the world
- raises funds from within our school community to benefit school life, improve the school infrastructure and provide fee-support via bursaries and scholarships
- recruits volunteers from within our school community to help further the school's aims
- archives and preserves historic articles from the school's past, making them accessible to our school community

About this notice

This notice is to help you understand **how** and **why** we collect personal information about you and **what** we do with that information when carrying out our fundraising and development activities. It also explains the decisions that you can make about your own information.

If you have any questions about this notice please contact the Development and Engagement Office development@brightoncollege.net

What is personal information?

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

This includes your contact details, next of kin and financial information. CCTV, photos and video recordings of you are also personal information.

How we collect personal information

We collect information about members of our school community to help us carry out our work. We collect this information from the following sources:

- other teams within the College where this is relevant to our work
- from you during the course of our relationship with you, for example when you sign up to receive communications from us or order tickets for events
- from the school's online merchandise shop provider, Shopify e.g. if you supply updated contact details with your order
- correspondence sent directly to the Development and Engagement Office e.g. emails with updated contact information
- the school's pupil management system, ISAMS
- the school's online networking platform, Brighton College Connect
- school listings of pupil clubs and societies e.g. members of the First XV
- school publications, such as The Brightonian and The Review
- forms completed when applying for and entering the College (both pupils and staff)
- information collected upon graduation from the school e.g. university destinations

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- publicly available sources and information publicly shared on social media e.g. job title on LinkedIn
- donation forms and data collection forms (both in paper form and online) sent to the school

What information do we collect and how do we use it

- **Personal details** (name, date of birth, sex, nationality, names of family members, relationships with other members of the school community) is collected for the upkeep of our records of Old Brightonians and parents.
- **Professional details** (occupation, employer, nature of business, employer location) helps us to identify members of our community who could potentially help our pupils in finding work experience/internships, or volunteer within our wider careers programme. For former staff we keep the dates when you worked at the College and roles that you held within the College community (e.g. Housemaster, sports coach).
- **Contact details and preferences** (address, email address, telephone number) helps us to keep in touch with you even after your current involvement with the College (for example as a pupil, current parent or member of staff) has ended, to keep our community up to date on news from the school, upcoming events, volunteer opportunities and fundraising appeals.
- **School and university information of pupils** (House, school years, exam results, university institution, university course, university years, previous school) helps us to upkeep our school records, organise university-based events, and provide education references for our pupils, should they be requested by other schools, colleges and universities or potential employers.
- **Interests and hobbies of pupils** (clubs and societies from activities at school) to help us create events and communications which appeal to our school community e.g. invitations to an OB Golf event for those who played golf while studying with us, or to tell you about products sold to benefit the school such as clothing and sports goods.
- **Donation information** (donation amount, date, purpose/restriction, regular payment details, Gift Aid eligibility, Gift Aid address, financial due diligence materials) is stored and processed to maintain accurate financial records for the school, to help identify future fundraising campaigns or opportunities that may be of interest to you and to comply with guidelines of both the Charity Commission and HMRC.
- **Event Attendance Information** (dietary requirements, access requirements, guest names) is stored to best accommodate guests at school and alumni events. **Photographs** from the school archive and those taken at school events and Old Brightonian visits to the College are stored and used in our communications to publicise our work. We use photographs or videos in our publicity and on our social media platforms and website. If we consider that the photograph or video use is more privacy intrusive then we may ask for consent first.
- **Photographs** from publicly available sources (social media, news sites, Google etc.) may be extracted and stored on our CRM database. We use these photographs if you are due to attend an event or meeting, to ensure that you are recognised by relevant members of staff.
- **Interactions with members of our school community** (school events attended, correspondence, communication preferences) help us to communicate with our school community appropriately and at sensible intervals.

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

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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.

Please note that we do not store any credit/debit card or bank account details.

Additional information and Fundraising

Brighton College does not have an endowment that underpins our work and our future. We need to fundraise in order to continue to provide an exceptional education for generations to come, and to maintain our position as a leading school in the United Kingdom.

Our priority is that all of our fundraising is sensitive, safe and relevant. Therefore, for Old Brightonians, parents of past pupils and current parents*, we may supplement any data provided to us using publicly available information. This additional information (e.g. directorships, trusteeships, philanthropic history, geographical information, public measures of affluence, networks, news) helps us to learn more about our community members and focus our fundraising efforts. This, in turn, allows us to create the greatest impact on the school with the minimal level of expenditure.

*A current parent is defined as an individual whose child has been offered a place at the school without outstanding academic conditions. Please note that the school will never approach a parent for philanthropic support until their child has had their first official school day at Brighton College.

How is this information stored?

All of the personal data collected by the Development and Engagement Department is stored on the schools' Development and Engagement CRM database, Blackbaud Raisers' Edge (the leading provider of specialist software to the non-profit sector in the UK.) This data is processed by Brighton College but is currently hosted by Blackbaud in the United States.

Sharing this information

We may occasionally share your contact details with other departments within the school, so that they can contact you directly about any forthcoming initiatives or volunteering opportunities that we think you may particularly interest you.

In order to carry out the day-to-day operations of the department, a number of third party agents are occasionally contracted to supply services to the school. These organisations require temporary access to some of the personal data we hold. Agreements are in place to ensure that data is stored, transferred, processed and destroyed in line with the school's privacy and data management protocols.

- Name and address data is transferred to a third-party mailing house, to assist us with sending mail and publications to our community across the world.
- For individuals who donate to the school via Direct Debit, their Direct Debit details are shared with Rapidata Ltd., who process our Direct Debit donation payments.
- When you register to attend a school or alumni event, your event attendance information is shared with external venues and caterers to best accommodate you and your guests.
- In line with the school's Donation Acceptance Policy, major gift donations are subject to due diligence processes, supplied by Ethixbase, who are given access to name, address and the email address.
- To support our due diligence processes, we use the platforms Xapien, Parent Check+, and Ethixbase to screen potential parents and donors for sanctions, reputational risk and

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political exposure, who are given names and occupational data. A part of this process, there is a cross-reference against sanction and PEP databases provided by ComplyAdvantage.

- Name and occupation data is shared with Xapian, who are also used to streamline the research processes used by the Development and Engagement office to target its fundraising efforts, using publicly available information.
- To support our philanthropic fundraising activities, we may provide names, postal addresses and internal supporter identifiers to Prospecting for Gold (PFG). PFG will match this data with data from publicly available sources, in order to produce reports that allow us to focus our fundraising resources.
- Archive materials (for example schools rolls, photographs and registers) are catalogued on an archive database, Axiell's Calm Database, who also securely host this data.
- Upon request, the school is legally obliged to share any of the above personal information with government authorities e.g. police, HMRC.
- Depending on where you will go when you leave us we may need to provide your information to other schools, colleges and universities or potential employers. For example, we may share information about your exam results and provide references.
- In accordance with our legal obligations, we will share information with local authorities, the Independent Schools Inspectorate and the Department for Education where, for example, we have safeguarding concerns.
- We may also need to share information with legal advisers for the purposes 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 attending one of our events.
- If you make a donation to the College restricted to the support of one of the schools' affiliated/nominated third party charities e.g., London Academy of Excellence, we may share with them your name and details of your donation.
- If you offer to volunteer to help the school develop its overseas school network, your name, address, email address and telephone number may be shared with Brighton College International, a wholly owned subsidiary of Brighton College.

The school does not sell or swap any of its data to third parties and does not allow its agents to provide its data to third parties other than for lawful purposes.

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

The College relies on legitimate interests for most of the ways in which it uses your information. This means that the College uses your personal data in accordance with the legitimate interests of the College so long as these are not outweighed by the impact on you and does not involve special or sensitive types of data.

Specifically, the College has a legitimate interest in:

- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity.
- Maximising opportunities for pupils past and present to benefit from the expertise of our school community.

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- Enabling former pupils to keep in touch with their school friends and teachers, socialise and network professionally.
- Publicising and promoting the College in effective ways utilising all appropriate communications channels, using photographs, videos and images in our publicity and on our social media platforms and website.
- Organising social and cultural events for current parents all over the world.
- Raising funds to benefit school life, improve the school infrastructure and provide fee-support via bursaries and scholarships.
- Confirming the identity of prospective donors and their background and donor due diligence, in line with our fundraising and donations acceptance policies.
- Safeguarding and promoting the health and welfare of our pupils, staff and others with whom you may be in contact.
- Promoting the objects and interests of the College.
- Facilitating the efficient operation of the College.
- Ensuring that all relevant legal obligations of the College are complied with.

Legal obligation

The College might need to use your information in order to comply with a legal obligation, for example in line with the Proceeds of Crime Act 2002, or our health and safety obligations.

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 can send you tickets for a concert that you want to attend.

Public interest 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. We may also ask for your explicit consent before processing certain types of special category data.

Any use of your information before you withdraw your consent remains valid. To withdraw your consent please contact the Development and Engagement Office development@brightoncollege.net

Vital interests

For example, to prevent someone from being seriously harmed or killed.

The College may also process special categories of personal information. These special categories are defined by the ICO 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 reasons why the College may need to process this information might include:

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- To safeguard your health and welfare and take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's health condition where it is in the individual's interests to do so.
- To ensure that adequate access arrangements are available when you attend College events.

Our legal grounds for processing information falling into these categories are listed below.

Substantial public interest

The College is allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above.

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.

Medical purposes

This includes medical treatment and the management of healthcare services.

If you have any questions or concerns about the College's legal grounds for processing your information, please speak to the Development and Engagement Office.

Sending information to other countries

There are some circumstances in which we may need to send your information outside the UK. For example, this might arise where we, or third parties with whom we have a contractual arrangement, store information on servers based overseas.

The level of protection for personal information varies from country to country, particularly those outside the EU or EEA. We are permitted to transfer personal data into countries covered by UK adequacy regulations. For other countries, we will only transfer personal data where there are appropriate safeguards in place and after we have carried out a transfer risk assessment, or where there is an exception under UK GDPR permitting the transfer.

Please note that all Brighton College international schools are required by the College to enter into a contract incorporating standard data protection clauses recognised or issued in accordance with UK data protection law. These contracts consist of either standard contractual clauses issued by the European Commission (supplemented where necessary by an International Data Transfer Addendum issued by the ICO) or an International Data Transfer Agreement issued by the ICO. Each of the European Commission and the ICO, respectively, has determined that these mechanisms offer sufficient safeguards on data protection for data to be transferred internationally.

If you have any questions about the safeguards that are in place, please contact the Development and Engagement Office.

How will we contact you?

In order to keep our community informed of news from the school and its activities, we will contact past pupils, current parents and past parents from time-to-time. This may be in the form of a

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monthly e-newsletter, annual magazine, direct personalised contact (i.e. email, telephone), letters and event invitations.

If, at any time, you do not wish to hear from us about a particular matter, via a certain communication channel, or indeed at all, you can let us know at any time by contacting development@brightoncollege.net

How long do we keep your information for?

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 and Engagement 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 photographs 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.

In all cases, the College will retain personal data securely and only in line with how long it is necessary to keep for a legitimate reason. If you have any specific queries about how this policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Development and Engagement Office. However, please bear in mind that the College may have lawful and necessary reasons to hold on to some data.

What decisions can you make about your information?

Data protection legislation gives you a number of rights regarding your information. We have summarised these below but please note that the legislation is complex and your rights are often not absolute and/or may be subject to other overriding considerations. In summary, your rights are as follows:

- Rectification: if information 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. This is commonly known as making a subject access request. You may also ask for other supplementary 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. This applies where (a) the information has been

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provided by you; (b) the basis that we are relying on to process your information is consent or contract; and (c) the information is being processed by us on computer.

- 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;
 - the legal ground on which we are relying is legitimate interests; or
 - we are using it for historical or scientific research purposes or archiving purposes, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To exercise any of your rights you can submit your request in writing to the Development and Engagement Office, development@brightoncollege.net

Further information

This notice is to explain how we use your personal information.

The Development and Engagement Office will update this Privacy Notice from time to time and you may wish to check the notice at the start of every school year. Any substantial changes other than at the start of the school year that affect your rights will be provided to you directly as far as is reasonably practicable.

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office: www.ico.org.uk. If you do have concerns about how we have handled your personal information we would kindly ask that you contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.

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