

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. 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 (contact details are provided at the end).

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:

- 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
- publicly available online sources and information publically 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

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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
- **Contact details** (address, email address, telephone number) helps us to keep in touch with pupils and their parents, even after pupils have left the school, 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, 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
- **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
- **Donation information** (donation amount, date, purpose/restriction, regular payment details, Gift Aid eligibility, Gift Aid address) is stored and processed to maintain accurate financial records for the school, and to comply with guidelines of both the Charities Commission and HMRC.
- **Photographs** from the school archive and those taken at school events 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.
- **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.

Please note that we do not store any credit/debit card 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 (i.e. whose child has become an official pupil* of the school without outstanding academic conditions) 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 child can appear as an 'official pupil' of the school before their first day of study i.e. if starting in September, the pupil roll is updated in advance, around 1st June of that year.

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How is this information stored?

All of our personal data 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 at their Boston server centre. Please note that Blackbaud are participants in the EU-US Privacy Shield.

Sharing this information

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. For all of the below, 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 Synergy Ltd, a mailing house, to assist us on sending mail and publications to our community across the world.
- Name and school information is shared with 3B Ltd, a web design agency, who use this information to update the Old Brightonian Website.
- 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.
- In line with the school's Donation Acceptance Policy, major gift donations are subject to due diligence processes, supplied by Kroll Ltd., who are given access to name, address and email
- 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.

Data will not be disclosed to external organisations other than those acting as agents for the school, with whom the school has data sharing agreements. 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.

Our legal grounds for using your information

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

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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, or others, 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.
- 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.
- 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.

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.

Vital interests

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

In addition, we may ask for your consent to use your information in certain ways. 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.

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.

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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 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?

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?

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 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 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. For example, we may keep photographs of your class for historical reasons.

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

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