



OLD MILLFIELDIAN SOCIETY PRIVACY NOTICE

This privacy notice explains how the Old Millfieldian Society ("we", "our", "us", or the "OMS") collects, uses and shares your personal data, and your rights in relation to the personal data we hold. This privacy notice concerns our processing of personal data of those in our alumni community ("you", "your", "Old Millfieldians" or "OMs").

The OMS, an unincorporated association based in the UK, is the data controller of your personal data and is subject to the General Data Protection Regulation ("GDPR") and the Data Protection Act 2018.

How we collect your information

We may collect your personal data in a number of ways, for example:

- from Millfield (registered company number 00522385, and registered charity number 310283, the "School") or another organisation closely associated with Millfield, such as [Millfield School Enterprises Ltd], [Millfield Foundation], or [Millfield Prep Parents and Friends organisation], for example to verify your status as an Old Millfieldian;
- when you communicate with us by telephone, email or via our website (millfieldconnect.com), for example in order to make enquiries about events, OM news or networking opportunities;
- in various other ways as you interact with us during your time as an Old Millfieldian, or as a member of our wider alumni community, for the various purposes set out below.

The types of information we collect

We may collect the following types of personal data about you:

- contact and communications information, including:
 - your contact details (including email address(es), telephone numbers and postal address(es));
 - your communication preferences;
 - records of communications and interactions we have had with you;
- biographical and educational information, including:
 - your name, title, gender, nationality and date of birth;
 - details of your education (at the School and afterwards);
 - details of your professional activities and employment, including work contact details;
 - your interests and extra-curricular activities;
 - information concerning your engagement with us, including attendance at our events, connections made through networking opportunities, visits you have made to the School, etc.;
- financial information, including:
 - your donation history, including gift amount, purpose, date, method of payment, cheque numbers or other payment references;
 - Tax status and Gift Aid declaration information;
 - details of financial transactions, for example tickets purchased for fundraising events;

- our assessment of your ability and willingness to make donations, including considerations of income; and
- donations to other organisations [where you have told us or where this is publicly available];

We may also collect sensitive personal data, including information concerning your health and medical conditions (for example disability and dietary needs), where this is necessary to facilitate your attendance at OMS events, etc.

How we use your information

The purposes for which we may use personal data (including sensitive personal data) we collect during an OM's association with us include:

- publishing stories and news items about our OMs and their studies, work and other achievements on our website at millfieldconnect.com and in electronic and printed publications (which we may send to you by post, email and potentially by other means, depending on your communication preferences from time to time);
- providing you with information about our events and our activities, for example, by sending you publications, e-newsletters, invitations to events and details of volunteering opportunities, including visits to the School (which we may send to you by post, email and potentially by other means, depending on your communication preferences from time to time);
- helping to further the School's charitable objectives including to help the School raise money or by asking you to donate to the School's work;
- operating our website available at millfieldconnect.com, including by using any of your personal data that you upload to that website;
- providing opportunities for OMs to network in their local area and online via the OMS website, and to connect around shared interests, for example in the School's and/or the OMS' Sports Clubs;
- transfer to HM Revenue and Customs in respect of any Gift Aid claims;
- 'wealth screening', profiling and research to gain a better understanding of our supporters, inform our fundraising strategy and target our communications more effectively and appropriately;
- administrative purposes, for example in connection with a donation you have made or an event you have registered for or attended;
- conducting surveys, focus groups and other research;
- internal record-keeping, including the management of any feedback or complaints.

The legal bases for processing your information and how we use it

We may process your personal data because it is necessary for our or a third party's legitimate interests. Our "legitimate interests" include our principal aim which is to keep members of the worldwide Millfield family in touch with each other, and our interests in facilitating for OMs to share their achievements, knowledge and insights with the School.

In this respect, we may use your personal data for the following:

- to keep you informed (by letter, telephone, email and other electronic means) of events, OM news, networking opportunities and other information which may be of interest to you as an Old Millfieldian or as part of our wider alumni community. (*Important note:* If you do not wish to receive such

information, or if you wish to receive this information only by certain means of communication, please let us know now or at any time in the future, and your details will be removed from our mailing list or your communication preferences will be updated, as applicable);

- for the administration of the OMS website; and
- helping to further the School's charitable objectives including to help the School raise money or by asking you to donate to the School's work.

We may also process your personal data where:

- it is necessary to meet our compliance and regulatory obligations, or to assist the School with theirs, such as compliance with anti-money laundering laws and tax reporting requirements when OMs make donations to the School;
- it is necessary to protect your or another person's vital interests, for example if you need emergency medical attention when attending one of our events; and/or
- we have your specific or, where necessary, explicit consent to do so.

Research, profiling and 'wealth screening'

To ensure that our communications are relevant to you and your interests and to assess your likely ability to make, and interest in making, donations to the School via the OMS, we may use additional information such as geographical information and measures of affluence to assist us. This will likely combine publicly available information, for example drawn from company resources and news media, with what you have provided to us, such as past donations and career information. We may use the services of external screening and profiling companies, and publicly available data from social media sites like LinkedIn, Facebook and Twitter, depending on your privacy settings and interaction with us.

We may hold personal data that has been created by us from other personal data that we already hold about you, either from internal or external research or profiling analyses. This may be carried out by automated or manual processes (although we do not make solely automated decisions in this respect) and enables us to better understand you as our supporter and make appropriate requests for support. A list of publicly available sources of information used for the purposes detailed above is available on request.

If you do not wish the OMS to do this for you, please contact omoffice@millfieldschool.com.

Sharing your information with others

For the purposes referred to in this privacy notice and relying on the legal bases for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data to the School, for example so that the School can keep records of attendees at OMS events hosted on School grounds. Where appropriate, we may also share your personal data with other organisations closely associated with the School, such as Millfield School Enterprises Ltd, Millfield Foundation or Millfield Prep Parents and Friends organisation.

Your information will not be shared with any third parties unconnected with the OMS.

International data transfers

As a matter of course, we do not transfer your personal data outside of the European Economic Area or indeed outside of the UK where the OMS and its website servers are based. We may, however, transfer your personal data around the world on an ad hoc basis, for example where this is necessary for interaction

with you, and you are located outside of the EEA. In such circumstances, we will consider whether any additional measures are required in order to give adequate protection for the information when it is transferred outside of the EEA.

How long your information is kept

We will retain Old Millfieldians' personal data in order to support your life-long relationship with the OMS [and with the School]. However, if you wish to leave this alumni community, please let us know and we will delete your personal data (except for a skeletal record of your attendance at the School, where applicable, for archiving purposes).

Disclaimer

Our social media channels and platforms are aimed at connecting OMs and sharing news and updates. This may also include business opportunities, however please note, people must undertake their own due diligence when entering into any purchases or investments. Please do report anything inappropriate to admins (Phoebe Hutton, Nicola Pender or Lucy Quinn) by sending us a message and we will take anything down that is offensive. Please do email Nicola Pender, Head of Alumni and Foundation, at pender.n@millfieldschool.com, with any specific concerns but we really hope these platforms can be a positive place for everyone to enjoy.

Your rights

Under the GDPR and the Data Protection Act 2018, you have the following rights:

- To be informed what personal data we hold about you and/or to obtain access to it (i.e. by receiving a copy of it in a permanent form);
- To require us to correct the personal data we hold about you if it is inaccurate;
- To request that we erase your personal data in certain circumstances;
- To request that we restrict our data processing activities in certain circumstances;
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights; and
- where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner. You can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: www.ico.org.uk.

Contact us

If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact our Head of Alumni and Foundation:

- by email: pender.n@millfieldschool.com
- by telephone: (0) 1458 444374
- or by post: Head of Alumni and Foundation, Old Millfieldian Society, Millfield School, Street, BA16 0YD.

Policy owner	OMS Society/Finance Director
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