

Haberdashers' Aske's Elstree Schools' Foundation Privacy Policy

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1 Introduction

This privacy notice explains how and why The Haberdashers' Aske's Elstree School's Foundation (Charity registration number 1107027) collects personal information about you when carrying out our fundraising and development activities.

This notice also outlines what we do with your information and what decisions you can make about your personal data in relation to fundraising and development.

Personal information is information that identifies you as an individual and relates to you. This includes your contact details, your relationship with the Schools and financial information.

Under data protection legislation, you have various rights to access and understand the personal data we hold about you, and in some cases to ask for it to be erased or amended. In some cases, however, we may be legally required to retain some of your core data, for example, to keep a record or your non-mailing preferences and the years which you attended the School.

2 What sort of personal data does the Foundation hold?

The personal data that we hold will typically include;

- Your name
- Postal and email address
- Phone number
- Date of birth
- Gender

- Admission and leaving dates (if you are a former member of staff we record the dates that you worked at the School)
- School house
- University attended, as well as subject studied
- Anytime you have contact with us we record this on your profile

We also record information needed to claim Gift Aid on donations.

Where provided by you, or from publicly available and reputable sources, we may also record:

- Family details and key relationships with other Old Haberdashers or supporters of the School
- Your career highlights, life achievements, areas of personal interest and philanthropy history
- Personal data provided by you for a specific purpose (e.g., accessibility needs or dietary requirements for event management)
- Communication preferences
- Volunteering by you on behalf of the Schools
 - Records of any donations
 - Information about your wealth
 - Media articles about you
 - Information on your engagement in School meetings, events, groups or networks

3 How the Foundation collects data;

The Schools collect data through information that you give us by filling in forms, writing to us either via post or email, or when you sign up to our alumni network Habs Community. The information you may give us may include your name, address, email address, phone number, photograph, and/or other such information as you give us from time to time.

However, in some cases personal data may be supplied by third parties (for example another school, or other professionals or authorities working with that individual); or collected from a third party or publicly available resources (for example, if you post something on Habs Community, Facebook, Twitter, or if we find out about one of your achievements through a story in the newspaper, online, or if someone else informs us).

The Schools may also collect information from publicly available sources about alumni occupations and activities to maximise the Schools' fundraising potential. This includes, but is not limited to, social media (e.g. LinkedIn, Facebook), websites (including news media sites, Companies House etc.) and publications (e.g. national/local newspapers or magazines and trade press).

4 How we use your personal data;

Personal data held on the database (and other information we collect about you) will be used for the following purposes by the Foundation:

- To tell you about Haberdashers'-related events and activities taking place, that we believe are most relevant to you (including reunions and social events);
- To send you information about both financial and non-financial ways to support the School, such as offering careers advice to current pupils, and to ask for such support;
- To inform you about developments at Haberdashers and fundraising appeals established to help fund those projects;
- To provide you with the services, products and information you have asked us for, including publications, such as the Aske Report, Skylight, Skylark and Green House;
- To provide a link between Old Haberdashers, the Foundation and the Schools, and to sustain your interest in the Schools and the Foundation;
- To conduct research to ensure that members of the Haberdashers' community with the capacity to make a major contribution to the Schools' fundraising appeals are identified;
- To keep a record of your relationship with us;
- To keep alive the spirit imbued by the Founders of the Schools and to uphold the reputation of the Schools.

We may profile and categorise individuals using automated or manual analyses, so that we can tailor our communications and make appropriate requests for support, making the most efficient use of our resources. For example, we might create a rating of your level of engagement, considering your likely ability to give and your interest in making a donation to the Schools. In order to do this, we would review all your interactions with the Schools, such as event attendance, donation history, geodemographic data and measures of affluence, where available from publicly available sources.

5 How we will contact you

Communications may be sent by post, telephone or electronic means (principally by email), depending on the contact details we hold, and the preferences you have expressed about the types of communications used.

If you unsubscribe from any or all of the communication channels mentioned above, we will update our records to stop further communication as quickly as we can. Due to some communications already being in progress at the point you opt out, please be aware that it can take several weeks for your preferences to be fully implemented.

6 Who we share your personal data with;

We may share data occasionally on a considered and confidential basis, where appropriate under contractual confidentiality agreements, with;

- Selected members of Schools' staff for specific reasons (most usually the Heads, the Chief Operating Officer, the School Archivists or the Heads of Careers and Mentoring)
- Contractors providing services to you on our behalf or services to us (our "data processors"), including, but not limited to, Blackbaud Inc, Rapidata, TryBooking, ToucanTech and Sage Pay
- Government departments, particularly HMRC
- We may also need to share information with our legal advisors for the purpose of obtaining legal advice

Should you choose to attend an alumni event organised by either School your name, dates at the School and house along with the names of any guest(s) will be shared with other attendees unless you decide to 'opt-out' at the point of registration. We also facilitate communication between individual Old Haberdashers, but in doing so we will never release your personal contact details without your permission first.

If you make a donation to Haberdashers' Aske's Boys' School or the Haberdashers' Aske's School for Girls, you are given the option of deciding whether your name can be used in donor lists and other stewardship materials. If you consent to this, we may publish your current name and the fact that you are a Haberdashers' Aske's Boys' School or Haberdashers' Aske's School for Girls donor. We may need to disclose your details if required to the police, regulatory bodies or legal advisors.

We will never sell your personal data to third parties under any circumstances or permit third parties to sell on the data we have shared with them.

7 Lawful Basis for Processing Your Information

7.1 Boys' School

If you are a Boys' School alumnus we are using your information when this is necessary for our legitimate interests, except when your legitimate interests and fundamental rights override our legitimate interests. We, specifically, have a legitimate interest in:

- Ensuring that there is an active community of supporters which will benefit the Schools and members of the Schools community and maintaining relationships with our alumni
- Communicating with members of the Haberdashers' community: pupils, alumni, current and former staff and current and potential supporters
- Promoting the objects and interests of the Schools. This includes marketing and fundraising.
- Using your personal information to administer our events
- Safeguarding and promoting the welfare of our pupils with whom you may be in contact
- Ensuring that we comply with our legal obligations
- For the purposes of due diligence, and to confirm that identity of prospective donors and their background and relevant interests

In contacting you, we will only use your information to provide you with details of news, products, funding opportunities and services which we identify as being relevant to you. We will communicate

this information to you via telephone, postal mail, and electronic means (email), provided you have not opted out of any of these forms or communications.

Whilst we rely on legitimate interest as the legal basis for processing where this is not overridden by the interests and rights or freedoms of the data subjects concerned, we recognise that it is not the only lawful ground for processing data. As such, where appropriate, we will sometimes process your data on an alternative legal basis – for example, because you have given us consent to do so.

7.2 Girls' School

If you are a Girls' School alumna your information may be used if you have consented ('opted in') when the School asked you for this permission.

In contacting you, we will only use your information to provide you with details of news, products, funding opportunities and services which we identify as being relevant to you. We will communicate this information to you via telephone, postal mail, and electronic means (email), provided you have not opted out of any of these forms or communications.

The use of your information for the purposes set out above, in section 4, is lawful because one or more of the following applies:

- you have given us your consent for the information to be used
- it is necessary for us to hold and use your information to carry out our obligations under a contract entered into with you

8 How long do we store your information for?

The Foundation considers its relationships with our alumni, staff, friends, donors and stakeholders to be lifelong, and we will keep hold of your details until you tell us you no longer wish to hear from us. In this instance, the Foundation will delete most of your personal data it holds, but it will maintain basic personal data to ensure that we do not inadvertently create a duplicate record in the future.

In addition to the above, we will take into consideration our legal obligations, and tax and accounting rules, when determining how long we should retain your information. When we no longer need to retain your information, we will ensure it is securely disposed of, at the appropriate time.

9 What rights do you have over your personal data

You have the right to:

- Be informed about the collection and use of your personal data
- Rectify incorrect or incomplete personal information we hold on you
- Erasure, or be forgotten, by asking us to remove your personal data
- Make a Subject Access Request (SAR) for the personal data we hold on you
- Withdraw your consent, or change or restrict your processing and communication preferences at any time by contacting the Foundation
- Receive personal data you have provided in a structured, commonly used and machine-readable format, or request we transmit it directly to another controller
- Object to certain purposes and bases for processing your personal data

10 What can you do if you find our response unsatisfactory?

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Please contact us at foundation@habsboys.org.uk or alumnae@habsgirls.org.uk. Note that we may not always be able to comply with your request (e.g. if we are legally required to store the data, we would not be able to comply with a request for erasure). The Schools may also need to retain some of your core details to ensure that no more communications are sent to you (name, unique identification number and date of birth).

You should be aware that certain data are exempt from the right of access. These may include information which identifies other individuals, or information which is subject to legal professional privilege.

You can find out more about your data protection rights on the [Information Commissioner's Office \(ICO\)](https://ico.org.uk/) website.

Changes to this privacy statement

The terms of this Privacy Statement may change, so please check it from time to time. You can see the date this Statement was last updated at the end of the document.

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