



DATA PROTECTION - DEVELOPMENT OFFICE PRIVACY NOTICE

1. Introduction

The Development Office is a department within the College. The mission of the Development Office is:

- to engage with the College's worldwide community (including current and former parents, pupils, staff, Governors and donors);
- to assist the Old Alleynian Association (the College's alumni association); and
- to identify and engage with prospective donors.

The collection and processing of data is required to accomplish this mission.

2. What personal data is collected?

The Development Office collects and holds the following data, where possible, on members of the College's community, donors and prospective donors:

- Your names and contact details;
- Your contact preferences;
- Your date of birth;
- Your family, spouse/partner details;
- Your engagement with the College, including events attended, voluntary work done and particular areas of interest;
- Details of your education (including higher education);
- Your current interests and activities, which may include selected media coverage;
- Your philanthropy and volunteering, including gifts, donations and service to the College and other charitable organisations;
- Your relationship with other members of the College community;
- Your employment and professional activities;
- Financial information that is publicly available.

We use targeted internet searches and may search the following websites (either directly or using search engines), where relevant in order to obtain and maintain the accuracy of the data listed above:

- Public sources for companies (in order to find personal data of those companies' employees, directors etc.), including Companies House and other business-related resources (free and subscription) for UK companies, US Securities and Exchange Commission for US companies and Company websites.
- Public sources for charities (in order to find personal data of their employees, trustees etc. and to find information about donations and support), including the Charity Commission and other internet sources for UK non-profits and GuideStar US for US non-profits.
- Public sources for individuals, including Who's Who, Debrett's People of Today, Sunday Times Rich List and other rich lists, property websites, the Queen's Honours Lists, national change of address services and LinkedIn.
- Press sources for due diligence purposes (including subscription services).

3. How is data collected?

Some personal data that you provide to the College will also be held in the Development Office for example, personal data provided through the College's admissions process, but this will never include medical or health information held only by the Medical Centre or detailed financial information supplied only to the Finance Office unrelated to any contact with the Development Office. Some information will be provided directly to the Development Office such as event registrations, conversations held in the course of involvement with Development Office staff and volunteers, and through change-of-address and donation forms.

The Development Office will always endeavour to ensure that all personal data held about you is as up to date and accurate as possible. Please notify the College of any change to your contact details.

In keeping with common practice in the charity sector, we also seek to update records with data collected from publicly available sources of information, for example, the Post Office's National Change of Address database, Companies House, the Register of Charities, PR announcements from employers and data enrichment services provided by carefully selected third parties.

4. How is data used?

The Development Office uses the data it holds for:

- Alumni activities and programmes, including event invitations, e-newsletters, alumni profiles and networking;
- Fundraising (including mail, email and telephone appeals);
- Administration of donations (including processing gift aid);

- Maintaining a record of the Development Office's relationship with members of its community, donors and prospective donors;
- Profiling, wealth screening and research in order to improve our understanding of our alumni and supporters, inform our fundraising strategy and target our communications more effectively;
- Development Office communications, including the Alleynian (the school magazine) and the Old Alleynian Association newsletter, updates on College activities and correspondence promoting the work of the College;
- Internal record keeping, including the management of any feedback or complaints;
- The maintenance of an historic archive in text and picture format; and
- Administrative purposes (e.g. in order to process a donation you have made or to administer an event you have registered for or attended).

Before seeking or accepting major donations we are required to conduct due diligence, including reviewing publicly available personal data relating to the donor's criminal convictions and offences.

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

5. Profiling and Wealth Screening

We use profiling techniques to ensure communications are relevant and timely and to provide an improved experience for members of the College's community and prospective donors. Profiling helps the Development Office to develop a better understanding of its community and prospective donors and enables us to make appropriate requests of donors and prospective donors. When building a profile we may analyse geographic, demographic and other information relating to donors and prospective donors, in order better to understand their interests and preferences.

6. How we keep your data safe and who has access

Access to personal data held by the Development Office is treated with sensitivity and access is restricted to authorised personnel only. We ensure that there are appropriate technical controls in place to protect your personal data. Our IT network is protected and routinely monitored. We undertake regular reviews of who has access to personal data that we hold and ensure that staff who have access to it are appropriately trained.

The Development Office may share personal data with suppliers who process data on behalf of the College, for example, a mailing house or data-cleansing provider. We carry out careful checks on these companies

before we work with them and put a suitable contract in place requiring strict adherence to Data Protection Law¹.

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to the same Data Protection Law as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with Data Protection Law.

The Development Office may share personal data with other departments within the College (e.g careers department). In addition, it shares data with members of the Old Alleynian Association and other individuals who are assisting the College in its fundraising efforts and alumni activities. For example, alumni class representatives are provided with enough data to conduct their work. All volunteers sign a privacy agreement that details the purposes for which the data can be used and the security measures that must be in place.

In addition, we share personal data about Old Alleynians (OAs) who are supporters of the DCM Hollington Trust² with the DCM Hollington Trust (for example to assist with the processing of Gift Aid declarations). The College provides administrative support to the DCM Hollington Trust.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors.

From time to time we may ask for your consent to us processing your personal data. For example, the Development Office may use photographs or videos of you as part of a wider group for the College's website and social media sites. If we wish to use a photograph which might be considered more privacy intrusive, we may contact you to seek your consent. If you have any concerns about the use of photographs and videos please contact the Development Office.

We do not 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. Legal basis of processing

The legal basis for processing your personal data for the interdependent purposes set out above is that it is necessary for the pursuit of our legitimate interests.

We always handle your personal data securely and minimise its use.

¹ The General Data Protection Regulation as retained and applied in the UK ("UK GDPR") and Data Protection Act 2018 and all other data protection law and regulations

² The DCM Hollington Trust (charity number 233862) owns the premises of the Hollington Youth Club in Camberwell, as well as a portfolio of investments built up from Dulwich College Mission collections and from OA donations and legacies. The Club was founded by the College in 1893.

There is no statutory or contractual requirement for you to provide us with any personal data.

8. Your rights

You have the right to:

- ask us for access to, or rectification or erasure of your data
- restrict processing (pending correction or deletion)
- object to communications or direct marketing
- ask for the transfer of your data electronically to a third party (data portability)

9. Retention Policy

We will retain your data indefinitely in support of your lifelong relationship with the College or until you request us to do otherwise. We will publish on our website any changes we make to this data protection statement and notify you by other communication channels where appropriate.

Where you exercise your right to erasure, we will continue to maintain a core set of personal data (including name, address, years at the College and date of birth) to ensure that we do not contact you inadvertently in future, and to maintain your academic record for archive purposes. We may also need to retain some financial records about you for statutory purposes (e.g. Gift Aid, anti-fraud and accounting matters).

10. Queries and complaints

If you have any query about this Privacy Notice or believe that the College has breached Data Protection Law, please contact the Clerk to Governors, Dulwich College, Dulwich Common, London SE21 7LD. Telephone 0208 299 9306. Email: legal@dulwich.org.uk

You also have the right to take any complaints about how we process your personal data to the **Information Commissioner's Office**, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Tel: 0303 123 1113 Website: www.ico.org.uk/concerns). Please note that the ICO recommends that steps are taken to resolve matters with the relevant organisation before involving the ICO.

Policy Owner:	Clerk to the Governors
Last Reviewed:	January 2023
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