



Privacy Notice for alumnae, current and former parents and family, former staff and donors

For the purposes of the GDPR and Data Protection Act 2018, Malvern St James Girls' School is the "data controller" of personal data for alumnae, current and former parents and former staff, and those in 'MSJ Community', e.g. past governors, past grandparents/family and general supporters of the School outside of these categories, referred to herein as "your personal data".

The purpose of this Privacy Notice is to explain how and why Malvern St James Girls' School collects personal information about you when carrying out engagement activities and fundraising activities. It aims to help you understand what personal information is, how and why we collect and process your personal information and our legal reason for doing so. It also explains your rights and the decision that you can make about your own information.

The Information Compliance Officer is the person responsible for managing how we look after personal information and deciding how it is shared. Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly, treat the information we get fairly.

What is "personal information"?

Personal information is information that identifies you as an individual and relates to you. This includes your contact details, your relationship with Malvern St James Girls' School and donor information.

What personal information does Malvern St James Girls' School hold about you and how is this obtained?

We hold a specific database with information about alumnae, parents, staff, former parents, former staff, donors and other supporters.

You provide us with information about yourself during the course of our relationship with you. For example, when you sign up to receive communications from us or when your child attended the school.

We will hold information such as:

- the dates when you or your child attended the School (if applicable);
- if you are a former staff member the dates when you worked at the School;
- your contact details;
- information about your achievements and interests;
- events you have attended;
- where you attended university and your occupation (if applicable);
- information about bursaries or scholarships you have received;
- your involvement with us e.g. if you carry out mentoring of current pupils or other Old Girls;
- records of any donations;
- your Gift Aid status if applicable;
- information from articles in the media and other publicly available sources;

- copies of correspondence;
- any dietary requirements for catering purposes that you have provided; and
- any disability which you may have so that we may make reasonable adjustments for you.
- news that you have sent in for our interest or for publication e.g. in the OGA News magazine/ digital newsletters

Why do we use your personal information?

We use your information in the following ways:

- to keep you informed about events and activities and in relation to your attendance at those events;
- to facilitate interaction between members of the school community and Old Girls' Association;
- to keep you informed about what is happening at Malvern St James Girls' School and within the Old Girls' Association;
- to maintain relationships with you and the school community, including direct marketing and fundraising activities to support the charitable aims of the school; and
- in connection with the other ways in which you might support the school (such as volunteering).

We may contact you for the above purposes by email, telephone, direct message and post (depending on what details you have supplied to us). If you tell us that you do not want to be contacted for any of these purposes, then we will of course respect that.

We may take photographs or videos of you at events, reunions or visits, to use in our publicity, which may include printed material, social media platforms and website. Please advise us at or before the event if you do not wish your image to be used in this way.

How and why does the School share your personal information with third parties?

If you use a third-party platform to donate to Malvern St James Girls' School (for example CAF), then we will receive information about you from them.

If you use a third-party platform to book onto an event (e.g. Eventbrite), then we will receive information about you from them.

In accordance with our legal obligations, we will share information with local authorities and the Department for Education, for example, where we have any safeguarding concerns. On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders.

We may also need to share information with our legal advisers for the purpose 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 at one of our events.

We may need to share information with contractors who help us with our work (e.g. with our database provider, our alumnae portal provider, mailing house and printing house for the production and distribution of magazines).

We may share your information with MSJ Enterprises for the purposes of direct marketing.

Our legal grounds for using your information

Legitimate interests: This means that we are using your information when this is necessary for our legitimate interests, except when your interests and fundamental rights override our legitimate interests. We rely on legitimate interests to use your information for all of the purposes described above unless consent applies (in which case see below). Specifically, we have a legitimate interest in:

- ensuring that there is an active community of supporters which will benefit the school and members of the community, such as current and former pupils, parents and staff;
- promoting the objects and interests of the school. This includes fundraising e.g. if we want to raise money as part of an appeal;
- safeguarding and promoting the welfare of our pupils with whom you may be in contact e.g. if you arrange work experience or mentor a pupil; and
- ensuring that we comply with our legal obligations.

If you object to us using your information where we are relying on our legitimate interests as explained above, please speak to the Information Compliance Officer.

Consent: You can withdraw your consent for us to use your information at any time. Any use of your information before you withdraw your consent remains valid. To withdraw your consent please contact the Information Compliance Officer at: infocompliance@malvernstjames.co.uk.

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 e.g. your copy of the OGA News magazine or tickets for a concert that you want to attend.

Legal obligation: On some occasions we will need your information to comply with a legal obligation. For example, we may need to keep a record of who is attending an event so that we can comply with our health and safety obligations.

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

Special Categories of Data

The school must also comply with an additional condition where it processes special categories of personal information. These special categories are 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 gender orientation.

The schools grounds for processing special personal information will depend on the circumstances:

- **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. These two conditions may also apply if we ever need to process information about criminal convictions and offences.

Sending your information to other countries

We may send your information to countries which do not have the same level of protection for personal information as there is in the UK, e.g. when communicating with you if you live overseas or storing your information on computer servers based overseas. The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then, in the absence of any other safeguards, it might not have the same level of protection for personal information as there is in the UK.

Where appropriate we may put in place additional safeguards, for example, if we are using a third party to process a payment then we may ask them to contract with us using model data protection clauses provided by the European Commission in the absence of any other appropriate safeguard. If you would like more information about the safeguards that are in place, please contact the Information Compliance Officer.

For how long do we keep your information?

We will only keep your information for as long as is necessary, in compliance with our data protection and other legal obligations. For example, we will need to retain contact details for you for so long as you want to be part of the school community so that we can communicate with you.

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 will keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the school; however, safeguards will be used such as anonymisation of data which identifies an individual.

For more information on how personal information is used by the School more widely please contact the Information Compliance Officer.

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. We will also give you extra 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 in certain circumstances
- **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 (e.g. to send you the Annual Appeal/School newsletter)
- the legal ground on which we are relying is legitimate interests
- 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.


Information Compliance Officer can give you more information about your data protection rights.

Further information and guidance

This notice is to explain how we use your personal information. Please contact the Information Compliance Officer if:

- you object to us using your information for marketing purposes e.g. to send you information about fundraising events. We will stop using your information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about you.

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)

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Signature	
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