

The American School in London

Privacy Notice: Advancement office

The current version of any policy, procedure, protocol or guideline is the version held on the ASL website. It is the responsibility of all employees to ensure that they are following the most up-to-date version.

Responsible party	Director of Technology
Approved by	Director of Safeguarding and Compliance
Responsible board committee	Advancement
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The American School in London Educational Trust Limited (ASL) respects the privacy of every individual who engages with our establishment and community. This privacy notice demonstrates our commitment to your privacy and outlines the information ASL may collect about you from your engagement with the advancement office and how this information will be handled.

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About this document

The American School in London is proud of its history of engagement, and spirit of generosity embraced by the ASL family around the world.

The purpose of the advancement office at ASL is to engage meaningfully with the school's worldwide community of current parents, alumni, parents of alumni, and current and former employees; to draw all constituents closer to the School and to each other; to promote the ideals of the institution; to encourage charitable contributions to the School; and to support ASL in achieving its mission of empowering each to thrive as a lifelong learner and courageous global citizen by fostering intellect, creativity, inclusivity and character.

In order to achieve this, the advancement office maintains a database of its constituents. The School takes the safeguarding of this information very seriously and operates in line with data protection law. This privacy notice is intended to provide information about how the School will use (or "process") personal data about its current parents, alumni, parents of alumni, and current and former employees.

This information is provided because data protection law gives individuals rights to understand how their data is used. Individuals are encouraged to read this privacy notice and to understand the school's obligations to its entire community.

This privacy notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This privacy notice also applies in addition to the school's other relevant terms and conditions and policies, including:

- any contract between the School and its employees or the parents of students
- the school's CCTV policy, responsible use agreement, and data retention schedule.

Anyone who works for, or acts on behalf of, the School (including employees, contractors, trustees and volunteers) should be aware of and comply with the school's data protection policy, which also provides further information about how personal data about those individuals will be used. For the purposes of this document, this group of individuals is referred to as 'personnel.'

Why we need to process personal data

In order to advance the mission of the School, the advancement office processes personal data it holds for:

- Alumni activities and programs, including event invitations, e-newsletters, alumni profiles and networking
- Fundraising, including mail and email appeals, wealth analysis, appeal segmentation and volunteering assignments
- School communications, including *Accents* magazine, updates on school activities and correspondence promoting the ideals of the School.

It is in ASL's legitimate interests to process personal data in order to maintain and build on the school's relationship with its constituents; to offer services and programs reasonably expected by alumni, parents, parents of alumni, and former employees; and to ensure the furtherance of the school's mission. The advancement office will seek specific consent for any processing where a constituent's interests, rights or freedoms override the legitimate interests of the School.

Types of personal data we process

The advancement office collects and holds the following data, where possible, on its constituents:

- Names and contact details
- Contact preferences
- Engagement with the School, including events attended and volunteer service
- Details of ASL education, including ASL activities
- Further and higher education
- Current interests and activities, which may include selected media coverage
- Philanthropy and volunteering, including gifts and service to ASL and other charitable organizations
- Information on financial assets that is publicly available
- Relationship to other ASL community members
- Employment and professional activities.

How we collect your personal data

The advancement office collects personal data provided through the school's admissions process, event registrations, conversations held in the course of involvement with ASL employees and volunteers, and through change-of-address and donation forms.

In keeping with common practice in the education and charity sector, the advancement office also seeks to keep records up to date with data collected from publicly available sources of information and to append this information to constituents' records, for example the National Change of Address Service or public relations announcements from

employers. In addition, publicly available sources are used to further understand our constituents to enable the advancement office to:

- Assess constituents' ability and inclination to engage with the School, both in terms of volunteering and financial support
- Tailor proposals, appeals and requests for donations
- Be effective and efficient in its work.

Publicly available sources include:

- Annual reports
- UK Charities Commission
- Companies House and other business related resources
- Guidestar
- LinkedIn
- Mouseprice
- National and international newspapers
- National Change of Address Service
- Rich lists: Forbes and Sunday Times
- SEC EDGAR
- UK Charity Commission
- UK Land Registry
- Zillow
- Zoopla

Research and wealth analysis

Philanthropy and volunteering are at the heart of the ASL community and the School relies on gifts of time and treasure. In order to ensure the success of the advancement program, ASL uses the sources listed above to analyze an individual's wealth, and ability and inclination to support the School. This vital work helps the advancement office to determine an appropriate and respectful proposed level of giving. At the heart of this work are the students who benefit every day from the generosity of the global ASL community.

Who has access to personal data and with whom we share it

Occasionally, the advancement office needs to share personal information relating to its community with third parties, such as:

- subsidiaries and foundations that support ASL
- professional advisors (e.g., lawyers, insurers, public relations advisors and accountants)
- the Parent Community Association (PCA)
- government authorities (e.g., HMRC, DfE, police or the local authority).
- agents processing data on behalf of the School, e.g., mailing houses

- connected individuals working on behalf of the school's fundraising efforts, e.g., parent and alumni canvassers.

All third parties are carefully vetted for strict adherence to data protection law. For organizations based in the US, the School enters into a written contract that details the purposes for which the information can be used and the security measures that must be in place.

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.

How long your information is kept

The School will retain personal data securely and as long as it is necessary to keep it for a legitimate and lawful reason, and inline with ASL's retention policy.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data you believe to be relevant is considered for erasure, please contact the [data protection officers](#). Please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data following such request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfill your wishes (called a "suppression record"). The School maintains a data retention schedule, which dictates how long personal and special category data is kept and how it is to be archived and disposed of in accordance with data protection law.

Your rights

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. The School will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider, or require a proportionate fee (but only where data protection law allows).
 - You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information that identifies other individuals, or information that is subject to legal privilege (for example, legal advice given to or sought by the School, or documents prepared in connection with a legal action)
 - The School is not required to disclose any confidential reference given by the School itself for the purposes of the education, training or employment of any individual.

- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask the School to delete or remove personal information where there is no good reason for the School to continue to process it. You also have the right to ask the School to delete or remove your personal information where you have exercised your right to object to processing.
 - You may be aware of the “right to be forgotten,” however, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this privacy notice. All such requests will be considered on their own merits.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask the School to suspend the processing of personal information about you, for example if you want the School to establish its accuracy or the reason for processing it.
 - Where the School is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Examples where we do rely on consent are: participation in certain types of activities and certain types of fundraising and school advancement functions. Please be aware, however, that the School may not be relying on consent but has another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this privacy notice, or may otherwise exist under some form of contract or agreement with the individual (e.g., an employment or parent contract, or because a purchase of goods, services or membership of an organization, such as a parent or an alumni association has been requested).
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the [data protection officers](#) in writing. The School will endeavor to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights); however, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Data accuracy and security

The School will endeavor to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the admissions office of any significant changes to important information, such as contact details, held about them and maintain current information on school platforms.

Individuals have the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under data protection law).

The School will take appropriate technical and organizational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All personnel will be made aware of this policy and their duties under data protection law and receive relevant training.

This notice

The School will update this privacy notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

Contact and complaints

Any comments or queries on this policy should be directed to divisional offices or in writing to the [data protection officers](#).

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with data protection law, they should notify the [data protection officers](#). You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.