

Fundraising Privacy Notice

**Bedford School
The Harpur Trust**

June 2023

How We Use Your Information: Fundraising Privacy Notice

Introduction

This notice explains **how** and **why** Bedford School's Fundraising team uses your personal data when carrying out fundraising activities.

Bedford School (the School, 'we') is part of The Harpur Trust (the Trust) who are ultimately responsible for how the School handles your personal data. Under data protection law the Trust is a "controller" rather than the School.

This notice also outlines **what the School's Fundraising team does** with your personal data and what **decisions** you can make about your personal data in relation to fundraising.

If you have any questions about this notice, please contact Vincent Gaten, Development Director **Tel:** 01234 362265 & **Email:** vgaten@bedfordschool.org.uk. If the Development Director is not available, you can contact the Fundraising team on **Tel:** 01234 362263, **Email:** foundation@bedfordschool.org.uk, **Postal address:** Bedford School, De Parys Avenue, Bedford, Bedfordshire, MK40 2TU, in relation to any of the matters set out in this notice.

This notice only covers how the School uses your personal data for fundraising purposes. For more information about how the School uses your personal data more widely (for example, in relation to educating pupils) please ask the Director of Finance and Operations for a copy of the appropriate privacy notice. Andy Macfarlane, Director of Finance and Operations can be contacted as follows: **Email:** DFO@bedfordschool.org.uk, **Tel:** 01234 362241.

What is personal data?

Personal data is information about you from which you can be identified (either directly or indirectly).

This includes your contact details, your relationship with the School and financial information.

What personal data does the Fundraising team hold about you and how is this obtained?

We receive information about you from other teams within the School but only where this is relevant to our work. We obtain information from the Admissions Department and Academic Department about you and/or your child's time at the School and from the Human Resources Department about the dates when you worked at the School if you are a former member of staff.

We hold a specific database with information about pupils, parents, staff, former parents, former staff, 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 order tickets for events.

In addition, we will obtain your personal data from other sources, which we use for the purposes described below. There are others who might be involved in our fundraising activities, for example, members of your family and other alumni, who might tell us about your interests or your career.

We will hold information such as:

- your name, gender, and date of birth;

- information about your family, for example, whether you have any brothers or sisters who attended the School;
- any connection you may have with other members of the School community such as other alumni;
- 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 e.g., which sports team you were part of as a pupil or any hobbies that you have now;
- where you attended university and your occupation (if applicable);
- how you like to hear from us e.g., whether you have signed up to receive emails from us;
- your involvement with us. This includes correspondence with you, your attendance at our events, and whether you carry out mentoring of current pupils;
- records of any donations and your Gift Aid status if applicable;
- information from articles in the media;
- medical information or information about a disability you have, e.g., to make adjustments for you or to help you if you are hurt whilst taking part in an activity;
- any dietary requirements for catering purposes; and
- any disability which you may have so that we may make reasonable adjustments for you.

Why do we use your personal data?

We use your personal data in the following ways:

- to keep you informed about fundraising opportunities, events and activities, and in relation to your attendance at those events (for example, so that we can accommodate you if you tell us about any special needs or dietary requirements);
- to facilitate interaction between members of the School community;
- to keep you informed about what is happening at the School, for example, by sending you a copy of the School newsletter / magazine, for example Whinchat;
- in connection with providing financial support to the School (including making donations to the School, specific campaigns, such as for a new sports centre, and requests for sponsorship);
- in connection with the other ways in which you might support the School (such as when you volunteer); and
- in connection with any research we carry out. For example, we may ask you to complete a survey, provide feedback or join one of our focus groups.

We will contact you for the above purposes by email, telephone, social media, post or by text message, but we will only do this where we are allowed to do so under data protection law. If you

tell us that you do not want to be contacted for any of these purposes, we will adhere to your wishes.

If you wish to make a donation, particularly a donation of a substantial value, we may need to verify your identity and / or carry out financial due diligence on you. This may include taking and retaining copies of your identification documents and obtaining personal data from publicly available sources. Our due diligence policy is available upon request.

We will use your personal data to build up a picture of your ability to support the School philanthropically.

We may choose to instruct external networking screening companies to allow us to make informed decisions about the deployment of our resources to begin fundraising discussions and any follow up actions.

How and why does the Fundraising team share your personal data with third parties?

- If you use a third-party platform to donate, then we will receive information about you from them.
- If you attend one of our events, then we will share your personal data with event booking platforms.
- 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 our professional advisors. For example, we may share your personal data with our legal advisers for the purpose of obtaining legal advice.
- We will share information with HMRC in connection with Gift Aid claims.
- We use contractors to help us with our work or where we store our database in the cloud.
- We may share information with third parties such as network screening organisations to improve our understanding of our fundraising audiences.

Our lawful bases for using your information.

This section contains information about the lawful basis that we are relying on when handling your information.

Legitimate interests

This means that we are using your personal data 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 personal data for all of the purposes described except where we have asked you for your consent (in which case consent applies as the lawful basis). 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 School community, such as current and former pupils and parents;
- promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money for the bursary fund or new buildings;
- using your personal data to administer our events;
- safeguarding and promoting the welfare of our current and former 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 personal data where we are relying on our legitimate interests as explained above, please speak to the Development Director.

Public task

We rely on this basis (as well as legitimate interests) where we use personal data in order to look after those, we are responsible for. For example, if we needed to carry out checks on someone before allowing them to mentor our pupils.

Consent

In some cases, we are processing your personal data because you have given us your consent to do so.

If we ask for your consent to use your personal data for fundraising purposes, you can take back this consent at any time. Any use of your personal data before you withdraw your consent remains valid. To withdraw your consent please contact the Vincent Gaten, Development Director on **Email:** vgaten@bedfordschool.org.uk, **Tel:** 01234 362265.

Necessary for a contract

We will need to use your personal data 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 tickets for a concert that you have purchased tickets for.

Legal obligation

On some occasions we will need your personal data 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.

Sending your personal data to other countries

When the School sends personal data outside of the UK, we have to consider if the other country has the same level of protection for personal data as there is in the UK. Some countries are considered by the UK Government to have adequate rules, and this includes all of the European Union and some other countries, such as, New Zealand, Norway, Switzerland and Argentina.

The School sends your personal data to countries with adequate rules when we:

- Use a database which stores that personal data on UK(Primary) or on EU (Secondary) based servers.

In certain circumstances, we may send your personal data to countries which do not have the same level of protection for personal data as there is in the UK. For example, we may share your personal data with a third party whose cloud computer storage is on servers outside UK or EU. If we were to do so, we would follow Government guidelines, and expect the third party organisations to utilise additional levels of protection such as:

1. Use firewalls to protect internet connection.
2. Use of the most appropriate secure setting for devices and software.
3. Tight controls over who has access to your data services.
4. Advanced protection from viruses and other malware.
5. Latest update security patches to keep our software safe.
6. Policies that govern regular back up of data and removal of data within six months upon completion of a project.
7. Secure, encrypted file transfer services.
8. Password protections, within an MFA (Multi Factor Authentication) environment.

We will provide you with additional details about where we are sending your personal data, whether the country has an adequacy finding and if not the safeguards which we have in place outside of this privacy notice.

If you have any questions about the safeguards that are in place, please contact the Development Director.

For how long do we keep your information?

We have an ongoing relationship with you, and we would like you to be involved with the School for many years to come. For this reason, the Fundraising team keeps the majority of the personal data it holds about you indefinitely. For example, we keep your contact details so that we can continue

to stay in touch with you. Similarly, we will retain information about your involvement with the School as this helps us tailor our communications to you both now and in future.

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 also keep some information indefinitely for archiving purposes (this is known as "archiving in the public interest" under data protection law) and for historical research purposes. This includes the School's legitimate interest in research; supporting long-term accountability; enabling the discovery and availability of the School's and the wider school community's identity, memory, culture, and history; enabling the establishment and maintenance of rights and obligations and of precedent decisions; educational purposes; and commercial and non-commercial re-use. For example, we keep some old photos so that we have a record of what the School was like in the past. Information held in our archive may be made publicly available, but this would only be done in compliance with data protection laws.

The School will also keep information for a long time as part of its wider legal and regulatory obligations, even if that information is no longer needed for fundraising purposes. This is especially relevant to former staff, pupils, and parents. For more information on how personal data is used by the School more widely please contact the Director of Finance and Operations.

Although the Fundraising team keeps the majority of your personal data for a very long time, there are some exceptions to this. Further information can be found in our Information and Records Retention Policy, which is available upon request.

What decisions can you make about your information?

Data protection law gives you a number of rights regarding your information. Your rights are as follows:

- **Correction:** if information held about you by the School is incorrect or incomplete you can ask us to correct it.
- **Access:** you can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and who 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 personal data to you or to a third party in a format that can be read by computer in certain circumstances.
- **Restriction:** you can request that we restrict how we use your personal data.
- **Object:** you may object to us using your personal data where:
 - we are using it for direct marketing purposes e.g. to send you an email about a fundraising opportunity;
 - the lawful bases on which we are relying is legitimate interests or public task. Please see the section "Our lawful bases for using your information" above;
 - if we ever use your personal data for scientific or historical research purposes or statistical purposes.

The Development Director can give you more information about your data protection rights. To exercise any of your rights you can speak to Vincent Gaten, Development Director at **Email:** vgaten@bedfordschool.org.uk, **Tel:** 01234 362265.

Further information and guidance

The Development Director is the person responsible at our school for managing how we look after personal data and deciding how it is shared in relation to fundraising. The Development Director can answer any questions which you may have.

Like other organisations we need to keep your personal data 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.

If you fail to provide certain information when requested, we may not be able to provide the information or service you have requested. We may also be prevented from complying with our legal obligations.

You have a right to lodge a complaint with the Information Commissioner's Office - ico.org.uk. If you do have any concerns about how we have handled your personal data, we would kindly ask that you contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.