

# Alumni & Development Privacy Statement

## Foreword

Our alumni and supporters are extremely important to The Grammar School at Leeds; we have a tremendous history and by working together we can ensure that the school continues to thrive for the benefit of its students and the wider world.

We are investing in our alumni relations by providing publications, events and activities, to build a truly amazing alumni community of which we can all be proud. Therefore, as part of this growing community we want to ensure that you receive the right balance of information from us, and which most importantly suits you. The General Data Protection Regulations (GDPR) came into force in May 2018 and our privacy statement explains how we collect, store, manage and protect your data. It also outlines the types of data that we hold and how we use it to provide services to our alumni and supporters. We want to ensure that we are using your data sensibly and appropriately so that all of our activities, whether it's an event or a fundraising campaign, are done as effectively as possible with your best interests at heart, and this privacy statement outlines our commitment to you.

I am determined to make The Grammar School at Leeds one of the leading independent schools in the country, and having a vibrant and supportive alumni community is essential in delivering this vision which needs to be underpinned by complying with the GDPR. By working together we can ensure that the school continues to deliver an outstanding education for many years to come.

Thank you for your on-going support and commitment to the school, it's greatly appreciated.

A handwritten signature in black ink that reads "S. Woodroffe". The signature is written in a cursive style with a long, sweeping flourish extending from the end of the name.

**Sue Woodroffe, Principal**

## 1. General principles

- 1.1. The Grammar School at Leeds ("GSAL", "the school") is a data controller with registered address at Alwoodley Gates, Harrogate Road, Leeds, LS17 8GS and is committed to ensuring that all personal information is handled in accordance with the principles set out in the UK General Data Protection Regulation (GDPR).
- 1.2. GSAL will process information in accordance with Data Protection Laws (together the GDPR and Data Protection Act 2018) and its own Data Protection Policy and Data Retention Schedule. We take our responsibilities under Data Protection Laws seriously and ensure the personal information we obtain is held, used, transferred and processed in compliance with these requirements.
- 1.3. Fundraising is a key part of the school's work, and we are committed to working in a transparent, ethical, responsible and honest way. To reflect this commitment, we are a member of the [Fundraising Regulator](#) and committed to the Regulator's [Code of Practice](#).
- 1.4. This privacy notice applies to current pupils, alumni, donors, current and potential supporters and friends of the school.
- 1.5. This privacy notice describes the types of personal information that we collect, how we use and secure your information, and when we may disclose your information to third parties. It also describes your rights regarding your personal information and how you can access, correct and request erasure of your data.

## 2. What information do we hold?

- 2.1. The school maintains a record of attendance for all former students of Leeds Grammar School, Leeds Girls' High School and The Grammar School at Leeds as well as a record of other supporters and friends of the school. The information we store and process may include:
  - name, title, gender, sex and date of birth;
  - contact details, such as postal address, email address, phone number and links to social media accounts;
  - information about your time at the school (if applicable) and other academic institutions;
  - your occupation and professional activities;
  - your recreations and interests;
  - your family and spouse/partner details and your relationships to other alumni, supporters and friends;
  - records of donations and Gift Aid status, where applicable (as required by HMRC);
  - records of communications sent to you by us or received from you;
  - volunteering by you on behalf of the school;
  - information about your wealth;
  - media articles about you;
  - information on your engagement in school meetings, events, groups or networks.
- 2.2. The school processes direct debit and card payments, however, we do not store any credit/debit card details. The school engages with appropriately accredited service providers to process payments on its behalf.

## 3. How is personal data collected?

- 3.1. Generally, the school receives your personal information directly from you. For example, when you take part in one of our events, make a donation or in the ordinary course of interaction or communication, such as email or verbal conversation. Many of our alumni choose to manage and update their own details, which you can do online at: [www.gsal.org.uk/alumni/update-my-details](http://www.gsal.org.uk/alumni/update-my-details)
- 3.2. Education records, destination institute and contact details are transferred from the school's information management system (Capita SIMS) to a dedicated alumni and engagement database (Blackbaud eTapestry) upon pupil graduation.
- 3.3. Your information may be shared with us by third parties acting on our behalf who provide us with technical and payment services.

- 3.4. When you interact with us on social media platforms such as Facebook, Twitter or LinkedIn we may obtain some personal information about you. The information we receive will depend on the privacy preferences you have set on each platform.
- 3.5. We may obtain information about your visit to our website, for example the pages you visit and how you navigate the site, by using cookies. Please see our cookie policy for information on this.
- 3.6. We always aim to keep your details up to date, and from time to time we will conduct audits to check that the contact details we have for you are correct. We will use tools, such as Royal Mail, to validate any incomplete or inaccurate contact details.

#### **4. How do we use your personal data?**

- 4.1. The school will use your data in accordance with its legitimate interests or the legitimate interest of another, provided that these are not outweighed by the impact on individuals. When we rely on any legitimate interest, we will undertake a legitimate interest assessment to ensure that we take a balanced approach and have appropriate safeguards in place to protect your rights under Data Protection Laws and to ensure that our processing is in line with your reasonable expectations.
- 4.2. The school expects that the following uses may fall within its legitimate interests:
  - maintaining a record of school attendees;
  - maintaining records of historical importance for historic interest and research purposes;
  - providing communications about GSAL news and events, such as through 'Momento' magazine, Beyond GSAL and event invitations;
  - providing volunteering opportunities, such as giving lectures, mentoring and careers advice;
  - providing biographies for use within school (to inspire current pupils) and in preparation for meetings and events where it would be respectful to know basic background information about an attendee;
  - seeking work placement opportunities for current pupils;
  - connecting current pupils with alumni to assist in university selection;
  - providing access to the schools resources and facilities for recent leavers;
  - verifying claims made in matter such as job, study and visa applications;
  - fundraising programmes, such as funding for bursaries;
  - monitoring the effectiveness of our alumni and development activities; and
  - for the purposes of financial planning.
- 4.3. Other uses of your information will be in order to fulfil the schools legal rights, duties or obligations, including:
  - maintaining records of donations and Gift Aid status as required by HMRC;
  - compliance with legal obligations under money laundering regulations.
- 4.4. Collection and use of special categories of personal information

We may collect and process special categories of personal information where it is freely given and necessary to support you with a particular disability or medical condition when you attend an event with your explicit consent. Such special categories of personal information may include:

  - information about your physical or mental health or disability status to ensure appropriate arrangements are made every time you attend an event;
  - information about your religious beliefs to ensure you are appropriately catered for whilst attending an event and to ensure that you receive relevant communications and invitations from the school.

#### **5. Who has access to your data?**

- 5.1. Your information will be stored securely and may be accessed by staff who legitimately need the information to carry out their duties, including those in the external relations team, assigned IT support, and colleagues from other areas within the school who work closely with external relations on the provision of services to alumni. The amount of personal information shared within GSAL will be no more than is reasonably necessary.

- 5.2. The school may disclose your information to individuals, organisations or other entities outside the school which are acting as agents for the school, including:
- operating the school's alumni and engagement database and archive (E.g. Blackbaud eTapestry and Salesforce);
  - printing and distribution of the school's alumni magazine, 'Momento';
  - event organisers for the purpose of event planning following your acceptance of an invitation;
  - financial and legal advisors for the purpose of legal claims;
  - law enforcement, only where there is an ongoing enquiry and the appropriate disclosure form has been provided; and
  - relevant authorities for the purpose of fraud and credit risk reduction where there is a compelling need.

We do not sell or trade your information with any other organisations.

## 6. Profiling and analysis

We may analyse your personal information to create a profile of your interests and preferences so that we can tailor and target our communications in a way that is timely and relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. This allows us to be more focused, efficient and cost effective with our resources and also reduces the risk of someone receiving information they may find inappropriate or irrelevant. We may also analyse your personal information to help us better understand potential supporters.

Our profiling and analysis activities can be broken down into three categories:

### 6.1. Data matching

We may combine the personal information you give us with data obtained from external sources, such as press articles or LinkedIn to help us understand your interests and preferences. This enables us to tailor our communications and services to better meet your needs or the needs of others like you based on the insight we gain from the profile we build. We will not use the results of this data matching activity in a way that intrudes on your privacy or your previously expressed privacy preferences.

### 6.2. Segmenting

We conduct analysis of alumni and supporters by group, postcode and occupation. This is to ensure that campaigns or mailings are sent to those who will be most interested or likely to respond. This type of activity is not aimed at identifying specific individuals to target, but rather many individuals who may fall within a certain segment of alumni and supporters.

### 6.3. Major donor analysis

We may carry out research to determine whether an individual could be a potential major donor. We may use publicly available information from third party sources such as Companies House, published biographies and publicly available LinkedIn profiles. The type of information we collect can include:

- Career overview
- Gift capacity
- Areas of interest
- History of giving to us and others
- How the individual is connected to us and to others
- Public information on any philanthropic activities

On average we will conduct this type of research on less than 2% of our alumni community and it will only be in preparation of a pre-arranged meeting with you. We do not undertake third party wealth screening of individuals and we will never use automated systems to determine wealth.

## 7. How does the school protect your personal data?

- 7.1. The school takes the security of your data seriously. Internal policies and controls have been put in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees where there is a legitimate purpose in the performance of their duties.
- 7.2. Personal information relating to active members of our alumni community is held by Blackbaud on secure servers located in the United States, and the transfer is governed by standard contractual clauses certified by the UK regulatory authority (ICO).
- 7.3. The school's record of attendees for historical and archive purposes is held by Salesforce on secure servers located in the United States, and the transfer is governed by standard contractual clauses certified by the UK regulatory authority (ICO).
- 7.4. The school's paper archive is stored in a secure room on the Alwoodley site and is only accessed by employees who have a legitimate purpose in the performance of their duties.
- 7.5. Where the school engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

## 8. For how long does the organisation keep data?

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your information for is determined by operational and legal considerations. For example, we are legally required to keep records of financial transactions for tax or accounting purposes, which may be up to six years after a particular transaction.

The school reserves the right to maintain a record of school attendees for historical and archive purposes, which will include your name, date of birth, dates attended, school attended and a brief summary of any engagement with the school following departure. For more information on how long we retain your personal data you may request a copy of our retention schedule.

## 9. Your rights

We consider our relationship with alumni and supporters to be life-long, and we will use your details until you tell us you no longer wish to hear from us. We will always try to ensure that the data we hold for you are up to date, reasonable and not excessive. Your rights include:

- 9.1. **Right of Access** – You have the right to access information that we hold about you. We have up to one month to provide you with the information and at no cost to you. We will provide you with a copy of the information we hold that relates to you.
- 9.2. **Right to erasure (right to be forgotten)** – You have the right to request the erasure of personal data concerning you, where the school is not legally obliged to retain such information or where a compelling legitimate interest does not exist, such as in the case of records of attendance.
- 9.3. **Right to rectification** – You have the right to have inaccurate information about you corrected, or incomplete personal data to be completed. You can manage your own personal data at [www.gsal.org.uk/alumni/update-my-details](http://www.gsal.org.uk/alumni/update-my-details)
- 9.4. **Right to restriction of processing** – you have the right to request that we refrain from processing your data where you contest its accuracy, the processing is unlawful, where we no longer need the data but you require us to keep it for legal purposes or where we are considering any legitimate interest we may have for processing your personal data.  
**Right to object** – You have a right to object to our processing of your personal data where the basis of the processing is our legitimate interests or your consent. Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of data processing based on consent before it is withdrawn. To withdraw your consent please contact [alumni@gsal.org.uk](mailto:alumni@gsal.org.uk)
- 9.5. **Right to data portability** - You have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent or performance of a contract and is carried out by automated means. This is called a data portability request.

- 9.6. **Rights in relation to direct marketing** – You have the right to change your preferences or object to processing of your personal data for marketing purposes at any time.
- 9.7. **Rights related to automated decision-making, including profiling** – You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects.
- 9.8. If you would like to exercise any of these rights, please contact us at [alumni@gsal.org.uk](mailto:alumni@gsal.org.uk) or via the school's Data Protection Officer at [dpo@gsal.org.uk](mailto:dpo@gsal.org.uk)
- 9.9. More information about your data protection rights can be found on the Information Commissioner's Office (ICO) website. You also have a right to lodge a complaint about any aspect of how we are handling your data with the ICO and can do so at the following address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
0303 123 1113 | [www.ico.org.uk](http://www.ico.org.uk)

## 10. **Fundraising and marketing communications**

We may use your contact details to provide you with information about previous donations, our fundraising appeals and other opportunities to support us, if we think it may be of interest to you.

### Email/text/phone

We will only send you fundraising and marketing communications by email, text and telephone if you have explicitly provided your prior consent. You may opt out of our marketing communications at any time by clicking the unsubscribe link at the end of our marketing emails or by emailing [alumni@gsal.org.uk](mailto:alumni@gsal.org.uk).

### Post

We may send you fundraising and marketing communications by post unless you have told us that you would prefer not to hear from us. We rely on legitimate interest to send you marketing communication by post.

## 11. **Automated decision making**

We do not make any decisions about you using automated means and we do not envisage this changing in the near future. If the situation does change, we will notify you in writing.

## 12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. Any significant changes to the terms will be published on the school's website and you will be notified of such changes. For full details of how data and privacy are managed by the school, please visit: [www.gsal.org.uk/about/school-policies](http://www.gsal.org.uk/about/school-policies)