



PRIVACY NOTICE FOR OLD LEYSIANS AND OTHER SUPPORTERS

Introduction

The Leys School (“the School”) collects and processes personal data relating to Old Leysians and other supporters in order to successfully carry out its functions. The School is committed to being transparent about how it collects and uses that data and to meeting its obligations under Data Protection Legislation (as defined below).

This Privacy Notice is designed to help alumni, friends and supporters understand how and why the School and its Development Office processes your personal data and what we do with that data. This allows you to make informed decisions about that data.

This Notice should be read in conjunction with the School’s Data Protection Policy, available on the School website.

Definitions

In this Policy, the following definitions apply:

“*Data Protection Legislation*” means (i) the UK General Data Protection Regulation (“GDPR”) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the United Kingdom and (ii) any successor legislation to the GDPR.

“*Data Controller*”, “*data subject*” and “*processing*” shall have the same meanings as in the Data Protection Legislation.

“*Personal data*” shall have the same meaning as in the Data Protection Legislation, namely information that we hold about you and which identifies you. This includes information such as your name, date of birth, nationality, address, next of kin, occupation, dietary and medical details, your photograph (including that processed by CCTV) and vehicle details for those authorised to use the Schools’ car parks.

“*Special categories of personal data*” shall have the same meaning as in the Data Protection Legislation, namely personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a person’s sex life or sexual orientation.

Who we are

Under Data Protection Legislation, the School is the Data Controller. The contact details for the School are as follows: The Leys School, Cambridge, CB2 7AD.

If you have any comments, questions or concerns about the information in this Notice or your rights, please contact the Compliance Officer at the address above or by email at compliance@theleys.net.

How and why does the School collect alumni and other supporters’ personal data?

The Development Office is a department within the School, who may use personal data for building and maintaining alumni relations, promoting events, sending news and updates, recruiting alumni volunteers and mentors, making fundraising appeals, and organising fundraising, networking, charitable and other School events.



Examples of how we collect your personal data are:

- Verbal or written information from you
- The Donation Form (online and paper form)
- Online Subscription Form
- Sixth Form Leavers' Contact Form
- Legacy Brochure Reply Form
- Telephone Campaign application form (online)
- Completing forms at the School Office/Reception
- From publicly available sources, such as Companies House, social media, the internet, publications and news articles.
- Where you write an article for OL News.
- 'Leys Link', the School's online careers networking and mentoring platform, if you voluntarily register
- Please note that during the Covid-19 pandemic, the School may record your temperature for the purpose of symptom checking and safeguarding the school community before you come on to site.

Our legal grounds for using your personal data

We rely on the following legal bases for processing your personal data:

- We will use your personal data for the purposes of the School's **legitimate interests**, such as to continue our new or pre-existing relationship with you, to share School news, for fundraising purposes and to advertise and improve the School. This helps us to maintain our reputation and facilitate the effective operation of the School. We believe there is a balanced and legitimate interest in contacting Old Leysians and other supporters with general news, information about events and development projects. Where appropriate and in accordance with data protection legislation, you will be asked whether you would like to provide or renew financial support of the School, unless you have exercised your right to object to us contacting you about certain subjects or using certain methods (please see the 'Your Rights' section below for further information).
- Where it is necessary for **employment law** purposes, e.g. where you have completed a telephone campaign application.
- Where it is necessary for compliance with a **legal obligation**, such as disclosing your data to third parties such as the Police and Local Authority where we are legally obliged to do so.
- Where it is necessary to protect your or someone else's **vital interests**, for example in an extreme emergency.
- For the **public interest**, for example facilitating the effective operation of the School and for providing education services.

Special categories of your personal data need to be treated particularly sensitively and the School therefore has to further justify why it may need to use such data. Where applicable, our lawful bases for processing these types of data are:

- Where you have given **explicit consent**;
- Where it is necessary for the purposes of carrying out the obligations and exercising specific rights in the field of **employment** and **social security** and **social protection law**;
- Where it is necessary to protect yours or someone else's **vital interests**;
- Where the processing is carried out in the course of our **legitimate activities** where there are **appropriate safeguards** in place;
- Where you have already made the data **manifestly public**;



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- Where it is necessary for the purposes of establishing or defending a **legal claim**;
 - Where there is a **substantial public interest**;
 - Where it is necessary for the **provision of health or social care** or treatment.

Consent

In some circumstances, the School may ask for your consent for an additional and specific use of your personal data. You may take back this consent at any time. However, any use the School has made of your information before you withdraw your consent will still be valid.

Please be aware however that the School may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

What personal data does the School process?

The School processes the following personal data about alumni, friends and other supporters:

- Biographical information (your name, gender and date of birth, dates spent as a pupil at the School)
- Contact details and communication preferences
- Your education history
- Your familial relationships (parents, grandparents and siblings)
- Your clubs, society affiliations and your other connections with the School
- Your professional activities and employment or retirement status
- Details of your academic, career or other life achievements
- Your interests and extra-curricular activities
- Information you have publicly shared on social media
- Your volunteering activity for the School
- Your family and partner/spousal details
- Your relationships with other Leys alumni, donors and friends
- Your donation history and payment details
- Records of communications and interactions we have had with you
- Your attendance at School events
- Your interests and motivations.
- In certain circumstances, your wealth band.

Who might your personal data be shared with?

The majority of your personal data collected will remain with the School and only be used by the people who need to know the information. However, personal data may be shared with reputable third parties who have signed a non-disclosure agreement for the purposes of alumni activities, fundraising programmes or the promotion of benefits and services. Data may also be disclosed to other external organisations acting as agents for the School, for example mail houses for the mailing of publications.

Examples of people or companies that the School may share your personal data with are:

- The public, who may have access to your personal data where we share your information (such as name, previous house and School dates) in publications (such as OL News and Donors Report) and on our website;
- Third party organisations which carry out contracts on behalf of the School (such as a venue holding a School event);
- The School's catering company if we provide food for you at an event and you have dietary requirements;
- The Old Leysian Society, run internally through the Development Office;



- Paypal, if you make an online donation;
- The School's mailing house;
- Companies used to disseminate the electronic newsletter (OL News) and Donors Report;
- Telephone consultant firms;
- If you voluntarily sign up to 'Leys Link', the School's online career networking and mentoring platform, your data will be accessible by 'Headhunter Systems Limited', a company which the School has a data processing agreement in place with to ensure your data is processed securely. Some of your data will also be available to other users of the system, who are members of the School community. The Development Office approves each individual who registers. Users of the system may include alumni, governors, parents and former parents, staff and former staff and Sixth Form pupils. You will have control over the data you upload to the system. Registered users are able to hide their contact details through the privacy settings on their account. Other information that users provide, either during registration or subsequently in their profile, will be visible to other approved registered users and this will at a minimum be (where applicable) first name, last name, affiliation to The Leys, school dates, house(s), company, job title, industry, location (city).

As a fundraising organisation, we undertake in-house research and from time to time engage specialist agencies such as Graham Pelton and Prospecting for Gold to gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives. We undertake due diligence on these companies to ensure they process data securely and compliantly.

We may also carry out wealth screening to fast track the research using our trusted third-party partners. You will always have the right to opt out of this processing. We may also carry out research using publicly available information to identify individuals who may have an affinity to our cause but with whom we are not already in touch. We use publicly available sources to carry out due diligence on donors in line with money laundering regulations.

This research helps us to understand more about you as an individual so we can focus conversations we have with you about fundraising and volunteering in the most effective way and ensure that we provide you with an experience as a donor or potential donor which is appropriate for you.

If you would prefer us not to use your data in this way, please let us know using the contact details given in this Privacy Notice.

The School will only share your personal data with other people or organisations when it has a lawful reason to do so and where the School is assured that your personal data will be processed securely.

Transferring personal data outside the UK

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 communicate with you by email when you are overseas. Where the country does not have the same level of protection for personal data as there is in the UK, we will endeavour to put reasonable safeguards in place.

How does the School protect personal data and ensure its accuracy?

The School takes the security of your personal data seriously. It has internal policies and controls in place to ensure that your personal data is not lost, accidentally destroyed, misused or disclosed, and is accessed only by those who need to know the information for the performance of their duties.



The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate. Individuals must please notify the School of any significant changes to information held about them.

Your Rights

Individuals have a number of rights under Data Protection Legislation which you can exercise in certain circumstances. These include:

- You have the right to be informed about our collection and use of your personal data;
- If the data we hold about you is incorrect, you can ask us to correct it. We contact Old Leysians and other supporters by phone, email and post. If you wish to change your communication preferences, please contact the School Development Office;
- You can ask us to delete the personal data we hold on you;
- You can ask what personal data we hold about you and be provided with a copy. We will also give you extra information, such as why we use the data, where it came from and what types of people/organisations it has been sent to;
- You can object to the School processing your personal data;
- You can ask the School to restrict the use of your personal data;
- You can ask the School to send you or another organisation certain types of personal data about you in a commonly-used machine-readable format.

How long do we keep your personal data for?

Unless you request otherwise, the School will keep your data for as long as it needs to in order to maintain relations with you and monitor fundraising and development. Some information will be kept indefinitely for historical research and archiving purposes, such as names and dates of attendance at the School. The School archive is maintained as a resource to help inspire and equip current staff and pupils to understand and appreciate issues of identity, belonging and shared heritage; to prompt memories of School life among many generations of Old Leysians and to serve as a research resource for all interested in the history of The Leys School and the community it serves.

Donation details will also be kept, i.e. the amount of the donation and where the Donor intended for it to be directed, as well as financial data for historic campaigns.

Policy Review

This Privacy Notice will be reviewed annually and where appropriate, amended at any time in accordance with any changes in the law or guidance provided by the Information Commissioner's Office. Where appropriate, the School will notify data subjects of those changes in writing (including electronically).

Contact

If you feel that the School has not acted properly when using your personal information, you can contact the School at the above address or by email at compliance@theleys.net. If you are still unhappy with the way the School has handled your data, you can contact the Information Commissioner's Office on 0303 123 1113. For more information please see <https://ico.org.uk/concerns/>.