



Fundraising and Development Privacy Notice

St James Schools

April 2024

How we use your information

Introduction

This notice explains **how** and **why** the Development Office collects personal information about you when carrying out our fundraising and development activities.

This notice also outlines **what we do** with your personal data and what **decisions** you can make about your personal data in relation to fundraising and development.

If you have any questions about this notice please contact the Development Manager whose contact details are: Eleanor Mello, 0207 348 1789, e.mello@stjamesschools.co.uk, St James Schools, Earsby Street, London W14 8SH in relation to any of the matters set out in this document.

The Alumni organisation Seventh Form is part of the school and this notice covers how the Seventh Form uses your personal data. Once you leave the School, your basic personal data including name, contact details and cohort are rolled over onto the alumni database. As the Seventh Form is part of the School, the School is responsible for how it, and the Seventh Form, use your personal data. To use data protection terminology, the school is the “data controller” or “controller”.

This notice just covers how the Schools use your personal data for fundraising and development purposes. For more information about how the Schools use your information more widely (for example, in relation to the provision of education to pupils) please ask the Chief Operations Officer (COO) for a copy of the appropriate privacy notice, coo@stjamesschools.co.uk, 020 7348 1700, St James Schools, Earsby Street, London W14 8SH.

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 information do the Schools hold about you and how is this obtained?

We receive information about you from other teams within the Schools but only where this is relevant to our work. We obtain information from the school database about the dates when you attended the school and also your contact information, your house and positions held within the school. We hold a specific database with information about alumni, 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 to attend events.

In addition, we will obtain your personal data from other sources, which we use for the purposes described. These include LinkedIn, Facebook, Twitter, Instagram, media articles and other alumni who might tell us about your interests or career.

The School receives information about you from the Seventh Form as follows: your career path, awards won or other events of significance which may be of interest to the school for inviting you in for Careers talks, assemblies etc.

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 are mentoring any 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 that you have provided; and
- any disability which you may have so that we may make reasonable adjustments for you.

Why do we use your personal information?

We use your personal data in the following ways:

- to keep you informed about 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, for example, we provide an online portal to allow alumni to communicate. This can be found here: www.alumni.stjamesschools.co.uk;
- to tell you about products sold to benefit the School such as clothing and sports goods;
- to keep you informed about what is happening at the School, for example, by emailing you our monthly newsletter called the 7th Form Newsletter;

- 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);
- 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 or post 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, then we will of course respect that.

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 involve taking and retaining copies of your identification documents and obtaining your personal information from the following sources: internet search engines, 192.com, the Charity Commission, Zoopla, Business Week and related media articles. This is to comply with our legal obligations.

We will take photographs or videos of you to use in our publicity or on our social media platforms and website. If we consider that the photo or video is more privacy intrusive then we may speak to you about it first.

We will use your personal data to build up a picture of your willingness to give and how wealthy you are so that we can tailor our fundraising communications to you. As part of this we may use your personal data to help us decide how much we think you are willing and able to give. We will use the following information for this purpose: your postal address and history of giving. We will also obtain information from sources outside of the School. These sources are as follows: Zoopla (for house prices), LinkedIn, Bloomberg.

As a fundraising organisation, we undertake in-house research and from time to time engage specialist agencies such as 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 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. 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.

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.

If you would prefer us not to use your data in this way, please email us at e.mello@stjameschools.co.uk or call us on 020 7348 1789.

How and why do the Schools share your personal information with third parties?

- We use JustGiving as our platform for receiving some donations. We will therefore receive information about you from our JustGiving page.

- If you attend one of our events, then we will share your information with event booking platforms such as Toucan Tech, Eventbrite or Trybooking.
- In accordance with our legal obligations, we will share information with government and regulators such as local authorities, the Independent Schools Inspectorate / Ofsted 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 professional advisors. For example, we may share your personal 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 one of the Schools' premises or at one of our events.
- We will share information with HMRC in connection with Gift Aid claims.
- We use contractors to help us with our work (e.g. a printing company for our literature) or where we store our database in the cloud.

The School shares information about you to facilitate the ongoing running of the Seventh Form. This is explained in more detail above.

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 information 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 to 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 Development Manager.

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 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 Development Manager.

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 an event 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 information 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 may send your personal data to countries with adequate rules. For example, we may use an event booking platform which stores your personal data on servers in Ireland.

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 store your personal data in cloud computer storage with servers in the USA.

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 Chief Operations Officer.

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 Development Office 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 the 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 interests 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 photographs 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 marketing, development or 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 Chief Operations Officer.

Although the Development Office 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. If you would like a copy of the policy, please contact the Development Manager.

What decisions can you make about your information?

- **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 Chief Operations Officer can give you more information about your data protection rights. To exercise any of your rights you can speak to the Chief Operations Officer, coo@stjameschools.co.uk, 0207 348 1700. Please note that these rights do not apply in all cases and are subject to exemptions.

Further information and guidance

The Chief Operations Officer is the person responsible at our schools for managing how we look after personal information and deciding how it is shared in relation to fundraising and development.

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.

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 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.