

Privacy Notice for Seniors, Friends and Supporters of Wycombe Abbey

This notice is to help Seniors, Friends, donors and supporters of Wycombe Abbey understand how and why we collect personal information and what we do with that information. It also explains the decisions that you can make about your own personal information.

If you have any questions about this notice, please contact the Development and External Relations Office: development@wycombeabbey.com

Who we are

We (the School or Us) means Wycombe Abbey, the trading name of The Girls' Education Company Limited, and a Charitable company limited by guarantee. The Directors of the Company constitute the governing Council of Wycombe Abbey and are the Trustees of the Charity.

We are registered in England, No 47031. Registered Office: Wycombe Abbey School, High Wycombe, Buckinghamshire, HP11 1PE, Registered Charity No: 310638.

For the purposes of the Data Protection Act 2018 ("the DPA"), Wycombe Abbey is the "data controller" of personal information about donors, supporters, Seniors, their parents and former staff who join The Friends of Wycombe Abbey. ("your personal information").

What is this Privacy Notice for?

This Privacy Notice is intended to provide information about how we will use (or "process") personal information about you and former pupils and their parents and former staff. This is provided in accordance with the rights of individuals under Data Protection Law to understand how your personal information is used. You are encouraged to read this Privacy Notice and understand our obligations to you and the entire School community.

This **Privacy Notice** applies alongside any other information we may provide about a particular use of your personal information, for example when collecting information via Seniors' Connect, our online community provided by Graduway (Graduway Privacy Notice [available here](#)).

This **Privacy Notice** also applies in addition to other relevant terms and conditions and policies we have in place, including:

- Any contract between us and you
- CCTV policy
- Retention of records policy.

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governing council members and service providers) are made aware of and should comply with this Privacy Notice and our data protection procedures.

Responsibility for Data Protection

The Compliance Manager, acting as our data protection lead, will deal with any enquiries concerning use of your personal information (see section on Your Rights below). We will endeavour to ensure that all personal information is processed in compliance with this policy and Data Protection Law. The Head of Compliance can be contacted by email:

complianceoffice@wycombeabbey.com

What is personal information?

Personal information, often referred to as data, is information that identifies you as an individual.

This includes information such as your contact details and career information. We may also hold information such as your education history and donations made to the School.

Keeping in touch and supporting us

In order to carry out our charitable aims we may from time to time use the contact details of Seniors and other members of the School community to keep them updated about the School, fundraising activities or events of interest, including by sending updates and newsletters, by email and by post.

Where necessary we will always follow guidelines for electronic direct marketing material under the Privacy and Electronic Communications Regulations (PECR).

Unless you object, we may also:

- Share personal information about Seniors, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as communication software providers.
- Collect information from publicly available sources about parents' and former pupils' occupation and activities, in order to maximise the School's fundraising potential.

Should you wish to limit or object to any such use, or would like further information about them, please contact the Development and External Relations Office. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School may need nonetheless to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

Why we process your personal information

In order to carry out our function to maintain the School community and stay in touch with Seniors, we need to process personal information about you as an individual. Our primary reason for using personal information is to meet our charitable objectives of providing educational services and supporting the School community.

Other uses of personal information will be made in accordance with our legitimate interests, or the legitimate interests of another, provided that this is not unfair on individuals, and provided it does not involve special or sensitive types of information.

Our legal grounds for using your information will fall within the category of "**legitimate interests**" in supporting the charity:

- To provide education services, including career and work experience services to current and former pupils,
- To maintain relationships with the School community and Seniors, sending information and invitations about School events and activities taking place (including fundraising),
- For the purposes of due diligence, and to research prospective donors and their background and relevant interests.

We may ask for your consent to use your information in certain ways.

If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please contact the External Relations and Development Office if you would like to withdraw any consent given.

In most cases we will rely on one of the grounds above for a particular use of your information.

Types of personal information we process

- Names, addresses, telephone numbers, e-mail addresses and other contact details
- Correspondence
- Images of Seniors (and occasionally other individuals) engaging in school and Senior activities, and images captured by the school's CCTV system
- Personal information is used to identify members of the School community to approach for fundraising activities
- Careers and professional information to support our careers programme of events
- Sharing individuals' significant achievements with our governing Council and wider community
- Records of gifts and donations including financial information we are required to collect by law eg anti-money laundering.

How we collect information

Generally, we receive personal information from the individual directly. This may be via a form, via Seniors' Connect or simply in the ordinary course of interaction or communication (such as email or telephone conversations).

However, in some cases personal information may be collected from publicly available resources such as internet searches, in order to undertake due diligence on the School community or to research potential or continuing supporters.

Sharing personal information with third parties

For the most part, personal information collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols,

However, some functions are outsourced including but not limited to, cloud storage, records management, fulfilment houses, due diligence and anti-money laundering checks. In accordance with Data Protection Law, this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the School's specific directions. We share personal information with external service providers to support our Development and External Relations Office, for example communication software and database providers.

Sending information to other countries

We may send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may store your information on cloud computer storage based overseas; or communicate with you by email when you are overseas (for example, when you are on holiday).

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

If the country that we are sending your information to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal information as there is in the UK.

We can provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about these safeguards, please contact the Director of Development and External Relations.

How long we keep personal information

We will keep personal information securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep pupil personnel files is up to seven years following departure from the School, generally when the pupil reaches 25 years of age.

We can keep information about you for a very long time, or even indefinitely, if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School. If you have opted to join the network for Seniors, we will retain your information until such time as you opt out.

The table below shows for how long we keep different types of information.

Type of information	Retention period or the criteria used to determine the retention period
Seniors' record	We will retain a record of every Seniors' Circle number, house and year of leaving.
Public Examination Results and School Achievements	We retain a record of results in public examination, lists of school prizes and other significant achievements indefinitely.
Donations	Likely to be held indefinitely, even after death.

If you have any specific queries about how our retention policy is applied or wish to request that personal information that you no longer believe to be relevant is considered for erasure, please contact the Development and External Relations Office.

A limited and reasonable amount of information will be kept for archiving purposes, for example years of attendance at the School and House belonged to; and even where you have requested we no longer keep in touch with you, we will need to keep a skeleton record of the fact in order to fulfil your wishes (called a suppression record).

YOUR RIGHTS - What decisions can you make about your information

As Individuals you have various rights under Data Protection Law to access and understand what personal information is held by us, and in some cases ask for it to be erased or amended or have it transferred to others, or for us to stop processing it but subject to certain exemptions and limitations.

We will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits which is generally one month in the case of requests for access to information.

Rights of access

We 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, we may ask you to reconsider or require a proportionate fee but only where Data Protection Law allows it.

If you consider that the personal data we hold on you is inaccurate, please let us know.

Requests that cannot be fulfilled

You should be aware that UK General Data Protection Regulations (GDPR) rights (including the right of access) are limited to your own personal data, and certain information is exempt. This will include information which identifies other individuals.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse. All such requests will be considered on their own merits.

Subject Access Requests

Individuals can make subject access requests for their own personal information.

Consent

If we are relying on your consent as a means to process personal information, you may withdraw that consent at any time. Examples where we do rely on consent to hold information are:

- Parent/Seniors - careers and employer information

- Email communications permission for Seniors and Friends of Wycombe Abbey.

Whose rights?

Data protection legislation gives you a number of rights regarding your information. The rights under Data Protection Law belong to you, the individual, to whom the information relates.

What decisions can you make about your information?

- If information is incorrect you can ask us to correct it
- 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 what types of people we have sent it to
- 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
- You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer
- Our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

DATA ACCURACY AND SECURITY

We will endeavour to ensure that all personal information held in relation to you is as up to date and accurate as possible. You must please notify us of any significant changes to important information, such as contact details.

You have the right to request that any out-of-date, irrelevant or inaccurate information about you is erased or corrected (subject to certain exemptions and limitations under Data Protection Law); please see above for details of why we may need to process your information, and whom you may contact if you disagree.

We will take appropriate technical and organisational steps to ensure the security of personal information about individuals, including policies around use of technology and devices, and access to School systems. All staff and governing Council members will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

THIS NOTICE

We 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.

QUERIES AND COMPLAINTS

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.

Please speak to the Development and External Relations Office if:

- You object to us using your information for fundraising purposes e.g. to send you information about School developments. We will stop using your information for fundraising purposes if you tell us not to
- You would like us to update the information we hold about you
- You would prefer that certain information is kept confidential.

Any comments or queries on this policy should be directed to the Head of Compliance using the contact details complianceoffice@wycombeabbey.com

Complaints: If you believe that we have not complied with this policy, or acted otherwise than in accordance with Data Protection Law, you should notify the Bursar. 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.

Reviewed: November 2021

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