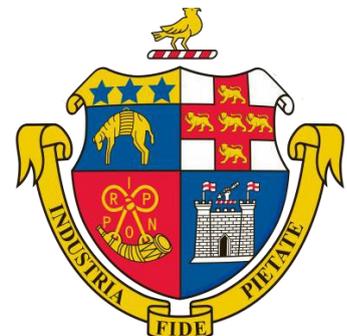


Privacy Notice for Alumni (HCU)

**Harrogate Ladies' College family of Schools:
Highfield Pre School, Highfield and College**

Issued January 2019



Privacy Notice

How we use your information

Introduction

This notice explains **how** and **why** Harrogate Ladies' College (College) and the Harrogate College Union (HCU) collect personal information about you. (For the purposes of this Notice, Harrogate Ladies' College refers to the family of schools including Harrogate Ladies' College and Highfield Prep and Pre-Pre Schools.

This notice also outlines **what we do** with your information and what **decisions** you can make about the information that we hold about you.

If you have any questions about this notice please contact the Alumni Relations Officer whose contact details are Harrogate Ladies' College, Clarence Drive, Harrogate, North Yorkshire HG1 2QG, Telephone 01423 537029.

Although this notice covers both the College and the HCU, each are responsible and liable for their compliance with data protection law. To use data protection terminology, the College and the HCU are each a "controller" or a "data controller" of your personal information.

In this notice we use terms such as "**we**", "**us**", and "**our**" to describe something which applies to both the College and the HCU. Where the notice refers to something which is specific to the College or the HCU then the notice refers to the "College" or the "HCU" as appropriate.

Your information is held on a database which is used by both the College and the HCU for their purposes as set out in this notice.

In respect of the College, this notice just covers how the College uses personal data for development purposes. For more information about how the College uses your information more widely (for example, in relation to the provision of education to pupils) please refer to www.hlc.org.uk/privacy or ask the Alumni Relations Officer for a copy of the appropriate privacy notice. The Alumni Relations Officer can be contacted as follows: Harrogate Ladies' College, Clarence Drive, Harrogate HG1 2QG, Telephone 01423 537029.

What is personal information?

Personal information is information that identifies you as an individual and relates to you.

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

What personal information do we hold about you and how is this obtained?

We receive information about you when you leave the College and complete the HCU application form, attend events or contact us via LinkedIn, Facebook or Twitter.

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 when you attend one of our events.

In addition, we will obtain your information from other sources, for example, other members of the College community, or your family who have links to the College or the HCU, might give us information about you.

We will hold information such as:

- your name, gender, and data of birth;

- information about your family, for example, whether you have any siblings who attended the College;
- any connection you may have with other members of the College community such as other alumnae.
- the dates when you or your child attended the College (if applicable);
- your contact details;
- information about your achievements and interests e.g. which sports team you were part of as a pupil;
- 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 other services such as mentoring of current pupils;
- information from articles in the media;
- 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 information?

We use your information in the following ways:

- to keep you informed about events and activities and in relation to your attendance at those events;
- to facilitate interaction between members of the College community for example, the HCU may pass on a member's contact details to another member (where the first member has consented to this);
- to provide you with updates about the rest of the community, such as to notify you of a death or funeral for a member;
- to tell you about products sold to benefit the College such as clothing and sports goods;
- to keep you informed about what is happening at the College, for example, by sending you a termly newsletter
- to keep you informed of HCU member news via a copy of the HCU magazine
- in connection with the other ways in which you might support the College community (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.

The College may also use your information in connection with the following:

- when you provide financial support to the College (including making donations to the College, specific campaigns, such as for a new sports centre, and requests for sponsorship); and
- the other ways in which you might support the College (such as when you volunteer) to provide careers talks, or mentoring;

We may contact you for any of the above purposes by email, telephone, 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 specific purposes, then we will of course respect that. We are committed to giving you choice about how you want to hear from us.

- If you wish to make a donation to the College, particularly a donation of a substantial value, the College 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 help the College comply with its legal obligations.
- We may take photographs or videos of you to use in our publicity or on our social media platforms and website. If we consider that the photograph or video is more privacy intrusive then we may ask for consent first.

The College uses LinkedIn to obtain information about your employment history, profession, job title, where you work and University attended. This is for the purposes of for example, inviting you to share experiences of a particular university or career.

In future, the College may use other external sources to build up a picture of your willingness to donate and your financial profile so that we can tailor our fundraising communications to you. The College will provide further information before doing this.

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

- If you use a third party platform to donate, then the College will receive information about you from them.
- If you attend a College or a HCU event, then the College may share your information with event booking platforms such as Eventbrite.
- In accordance with its legal obligations, the College will share information with local authorities 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 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 school premises or at one of our events.
- The College 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 and mailing houses) or where we store our database in the cloud

Our legal bases for using your information

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

Legitimate interests

This means that we are using your information 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 information for all of the purposes described above unless any of

the alternative basis in the table below apply. Specifically, we have a legitimate interest in:

- ensuring that there is an active community of supporters which will benefit the College and members of the College community, such as current and former pupils and parents;
- using your personal information to administer our events;
- ensuring that we comply with our legal obligations.

In addition, the College has a legitimate interest in:

- promoting the objects and interests of the College. This includes fundraising e.g. if the College wants to raise money for the bursary fund or new buildings; and
- 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.

If you object to us using your information where we are relying on our legitimate interests as explained above, please speak to the Alumni Relations Officer.

Consent

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

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. To withdraw your consent please contact the Alumni Relations Officer at hcu@hlc.org.uk.

Necessary for a contract

We will need to use your information 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 want to attend.

Legal obligation

On some occasions we will need your information 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.

We must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

Our condition or conditions for processing special personal information will depend on the circumstances:

Vital interests:

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Legal claims:

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

Substantial public interest

We are also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This will apply if we need to use special category data in connection with your attendance at one of our events. For example, if we need to make adjustments because of a disability you have.

The above conditions may also apply if we ever need to process information about criminal convictions and offences. For example, we would be relying on substantial public interest if processing information about criminal convictions in connection with carrying out due diligence on a prospective donor.

Sending your 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 computer servers based overseas, such as Mailchimp our email service provider, a US based company.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

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, in the absence of any other safeguards, it might not have the same level of protection for personal information as there is in the UK.

Where appropriate we may put in place additional safeguards, for example, if we are using a third party to process a payment then we may ask them to contract with us using model data protection clauses provided by the European Commission in the absence of any other appropriate safeguard. If you would like more information about the safeguards that are in place, please contact the Alumni Relations 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 us for many years to come. For this reason, we keep the majority of the personal information we hold 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 College or the HCU 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 can also keep information about you for a very long time or even indefinitely if we are retaining it for archiving purposes (this is known as "archiving in the public interest" under data protection law). For example, we keep old photographs so that we have a record of what the College was like in the past.

We will also keep information for a long time as part of our 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 information is used by us more widely please contact the Alumni Relations Officer.

Although we keep the majority of your personal information for as long as you are a member of the HCU, there are some exceptions to this.

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:

- **Rectification:** if information we hold about you is incorrect 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 what types of people 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 information to you or to a third party in a format that can be read by computer in certain circumstances.
- **Restriction:** our use of information about you may be restricted to simply storing it 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.
- **Object:** you may object to us using your information where:

we are using it for direct marketing purposes (e.g. to send you an email about a fundraising opportunity); the legal bases on which we are relying is legitimate interests. Please see the section "Our legal bases for using your information" above;

if we ever use your information for scientific or historical research purposes or statistical purposes.

The Alumni Relations Officer can give you more information about your data protection rights. To exercise any of your rights you can submit your request in writing to The Alumni Relations Officer, Harrogate Ladies' College, Clarence Drive, Harrogate, HG1 2QG.

Further information and guidance

The Alumni Relations Officer should be your first point of contact for the matters set out in this notice. The Alumni Relations Officer can be reached by email hcu@hlc.org.uk or by post to Harrogate Ladies' College, Clarence Drive, Harrogate, HG1 2QG.

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.

This notice is to explain how we use your personal information. The Alumni Relations Officer can answer any questions which you may have.

You have a right to lodge a complaint with a data protection supervisory authority. The supervisory authority in the UK is the Information Commissioner's Office - ico.org.uk. If you do have any concerns about how we have handled your personal information 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.