

G2 Fundraising and Development Privacy Notice

The Purcell School
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Charity No. 312855

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GDPR's Lawfulness, Fairness and Transparency data protection principle:

"Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject" [Art 5 (1)(a)].

Individual Rights

The UK GDPR provides the following rights for individuals:

- The right to be informed
- The right of access (Making a Subject Access Request (SAR) for personal data)
- The right to rectification
- The right to erasure
- The right to object
- The right to restrict processing
- The right to data portability
- Rights in relation to automated decision making and profiling

As outlined in the School's Data Protection Policy, we may not always be able to act on your request under one of these Rights due to our commitment, by law, to retain essential data. As a school, we are obliged to retain a base level of data on individuals, such as your name and if you are a student, the years you attended the School. We retain personal data only for as long as necessary for the purposes for which it was collected or where we are required to retain it by law. Different categories of information are retained for different periods. Our retention periods are determined by legal, regulatory, operational and historical/archival requirements. Further information is available in our Data Protection Policy.

We will store any opt out preferences to avoid any unwanted contact. For donors, we would need to store a record of any donation and Gift Aid declaration which we have claimed a tax exemption, however all original forms and physical copies of bank details will be destroyed.

The data the School's Development Team may process includes, but is not limited to:

- Personal information such as name, address, email and date of birth
- Attendance years to and from The Purcell School
- Employment information
- Communications with individuals via various mediums
- Records of donations, gifts in kind, pledges and Gift Aid declarations
- Communication and opt out preferences
- Event attendance and ticket bookings
- Images (digital or physical) and video recordings whilst a student at the School
- Industry links and media articles publicly available online about individuals
- Prospect research notes from publicly available sources or directly from the individual
- Bank or credit/debit card details for direct debits, box office sales and/or donations when provided directly to the School.

We rely on legitimate interests where appropriate to maintain alumni and supporter relationships, administer fundraising and development activity, conduct internal reporting and analysis, and create targeted and relevant fundraising events and communications. We consider that these activities are necessary to pursue the School's legitimate interests in maintaining relationships with its community and raising funds to support its charitable purposes, while taking into account the interests, rights and freedoms of individuals. You have the right to object to processing based on legitimate interests.

The Development Office within the School will use your data to shape the fundraising and alumni relations activity. This includes mailings, concerts, networking events and fundraising opportunities. This activity will be strategic, precise and relevant. In order to achieve this we will use the data available to us (both provided by you and in the public domain) to carry out targeted research. This research will inform the activity mentioned above and ensure our resources are used most effectively. We will use a range of sources and material available to us in order to achieve this, including wealth screening via a third party to shape fundraising efforts (any third party will be subject to data protection checks as laid out in our Data Protection Policy). This activity will only affect a very small percentage of those on our database and individuals have the right to object to this screening at any time via email at development@purcell-school.org. Wealth screening is used to identify potential capacity/propensity to support fundraising and does not make decisions about a person's entitlement to education, bursaries, admissions or other services. We list, promote and celebrate the donations we have received in Purcell concert programmes, other promotional material and on our website.

We may use information to segment or profile supporters for fundraising and alumni engagement purposes. This may include assessing publicly available information about an individual's potential interest in or capacity to support the School. This profiling does not result in decisions producing legal or similarly significant effects on individuals.

The Purcell School will never sell your data to a third party. Please refer to the School's Data Protection Policy for further details on how we keep your data safe and secure. The Development Team works with a number of providers to support the work of the fundraising aims of the School. As such, data is shared under strict agreements with, for example, our database provider ToucanTech (servers are with AWS in Dublin, Ireland), HMRC,

GoCardless Ltd for direct debits and occasionally mailing houses for postal or digital mailings.

We may disclose your information if required to by law or to enforce our legal rights. We use service providers that may process personal data on our behalf. We require these providers to comply with applicable data protection requirements and have appropriate contractual and technical safeguards in place. Where personal data is transferred outside the UK, we will ensure that an appropriate legal transfer mechanism and safeguards are in place.

We may share personal data with providers such as:

- payment providers, to process donations and payments;
- HMRC, where required for Gift Aid;
- our CRM/database provider, to maintain supporter records;
- mailing providers, to distribute communications;
- event and ticketing providers, where necessary to administer events;
- prospect research/wealth-screening providers;
- professional advisers.

The Purcell School retains an archive of photographs and video footage (both historic and recent). These images and videos are used by the School for marketing purposes and within communications to promote our work and fundraising. This data may also be shared at events and in concert material. If you wish to object to the use of your image or a video you appear in, please email development@purcell-school.org.

Lawful Basis For Activity

Activity	Lawful Basis
Maintaining alumni records	Legitimate Interests
Alumni relations	Legitimate Interests
Postal fundraising	Legitimate Interests (subject to the circumstances)
Email fundraising	Legitimate Interests / Consent; electronic marketing will comply with PECR, including the charitable-purpose soft opt-in
Processing donations	Contract / Legal Obligation / Legitimate Interests
Gift Aid	Legal Obligation
Maintaining donation records	Legal Obligation / Legitimate Interests

Wealth screening	Legitimate Interests, with a documented LIA
Event administration	Contract / Legitimate Interests
Marketing photographs and videos	Legitimate Interest
Statutory retention	Legal Obligation / Legitimate Interests, depending on the type of record

Your Rights

If you are unhappy with how we have used your personal data, please contact us in the first instance. You also have the right to complain to the Information Commissioner's Office (ICO), the UK's independent supervisory authority for data protection. <https://ico.org.uk/>

You have an absolute right to object to the processing of your personal data for direct marketing purposes, including profiling for direct marketing. If you object, we will stop using your personal data for direct marketing purposes. You may also withdraw consent at any time where we are relying on your consent as our lawful basis. To object, please contact development@purcell-school.org.

If you have any queries about how your data is used by the Purcell School you may contact development@purcell-school.org or the Bursar (also the Data Protection Officer) a.wroblewski@purcell-school.org for more information.

<i>Policy author / reviewer:</i>	<i>Policy date / review date:</i>	<i>Next review due:</i>
R Blake/ AM/ J Harding	May 2018	September 2020
Ruth Blake	September 2020	September 2021
C Harbour	November 2022	September 2023
C.Harbour	September 2023	September 2024
C.Harbour	September 2024	September 2025
C.Harbour	August 2025	September 2026
C.Harbour	August 2026	August 2027