

## ArtsEd Marketing and Development Privacy Notice

### How we use your information:

#### 1 Introduction

- 1.1 This notice explains **how** and **why** the Marketing and Development Office collects personal information about you when carrying out our marketing and development activities.
- 1.2 This notice also outlines **what we do** with your information and what **decisions** you can make about your information.
- 1.3 If you have any questions about this notice please contact the Development Director via **dataprotection@artsed.co.uk**.
- 1.4 The Marketing and Development Office is part of the School and it is the School that is ultimately responsible for how the Marketing and Development Office use your personal information.
- 1.5 This notice just covers how the School uses your personal data for marketing and development purposes. For more information about how the School uses your information more widely (for example, in relation to the provision of education to pupils) please ask the Finance Director for a copy of the appropriate privacy notice. The Finance Director can be contacted as follows: **dataprotection@artsed.co.uk**.

#### 2 What is personal information?

- 2.1 Personal information is information that identifies you as an individual and relates to you.
- 2.2 This includes your contact details, your relationship with the School and financial information.

#### 3 What personal information does the School hold about you and how is this obtained?

- 3.1 We receive information about you from other teams within the School but only where this is relevant to our work. We hold a specific database with information about alumni, parents, former staff, newsletter subscribers, donors and other supporters.
- 3.2 You provide us with information about yourself during the course of our relationship with you. For example, when you sign up to receiving communications from us or making a donation.
- 3.3 In addition, we may obtain your information from other sources such as LinkedIn, Zoopla, Bloomberg, Facebook, Twitter and media articles.

3.4 We may hold information such as:

- your contact details;
- the dates when you or your child attended the School;
- if you are a former staff member the dates when you worked at the School;
- information about your achievements and interests e.g. which performances you were part of as a student;
- where you went after you left us, for example if you attended university and your work since;
- how you like to hear from us e.g. whether you have signed up to receive emails from us;
- correspondence sent to you, or received from you;
- family and spouse/partner details, relationships to other contacts;
- your involvement with us e.g. if you carry out mentoring of current students;
- records of any donations;
- your Gift Aid status if applicable;
- information from articles in the media;
- information obtained from public sources such as LinkedIn, Zoopla, Bloomberg, Facebook, Twitter and media articles;
- any dietary requirements for catering purposes; and
- any disability which you may have so that we may make reasonable adjustments for you.

#### 4 **Why does the School use your personal information?**

4.1 We use your information in the following ways:

- to carry out our obligations arising from any contracts entered into by you and us;
- to keep you informed about events and activities such as performances and concerts and in relation to your attendance at those events;
- to maintain relationships with alumni and supporters of the school;
- to monitor effectiveness of our communications with you, including email tracking, which records when an e-newsletter from us is opened and/or how many and which links are clicked within a message. The data from this tracking is generally used in an aggregated and anonymised form;
- to keep you informed about what is happening at the School, for example, by sending you a copy of the School newsletter;
- in connection with providing financial support to the School (including making donations to the School, specific campaigns, such as for theatre equipment, and requests for sponsorship); and
- in connection with the other ways in which you might support the School (such as when you volunteer).

4.2 We may contact you for the above purposes by email, telephone or post but we will only do this where we are allowed to do so under data protection law (for example, we will usually need your consent before sending you an email about a fundraising opportunity). If you tell us that you do not want to be contacted for any of these purposes then we will of course respect that.

4.3 We may have to carry out financial due diligence in relation to any donation which you make to us. This may involve obtaining your personal information from sources such as internet search engines, 192.com, the Charity Commission, Zoopla, Business Week and related media articles. This is to comply with our legal obligations.

4.4 We may take photographs or videos of you to use in our publicity or on our social media platforms and website.

4.5 We may use tools such as Google Analytics to assist with our website. If we send you emails we may be able to tell whether or not you have opened these.

## 5 How and why does the School share your personal information with third parties?

- If you use a third party platform to donate (e.g. Just Giving) then we may receive information about you from them.
- In accordance with our legal obligations, we may share information with local authorities, the Independent Schools Inspectorate, the Department for Education and the Office for Students, for example, where we have any safeguarding concerns.
- On occasion, we may need to share information with the police.
- We may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- We may 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.
- We may use contractors to help us with our work (e.g. a printing company for our literature).

## 6 Our legal grounds for using your information

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

### 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 Development Director at [supportus@artsed.co.uk](mailto:supportus@artsed.co.uk).

### Legitimate interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to you.

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 pupils with whom you may be in contact e.g. if you arrange work experience or 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 Director.

#### Necessary for a contract

We may 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 inform you of priority booking periods.

#### Legal obligation

On some occasions we may 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.

#### Public interest

The School considers that it is acting in the public interest when carrying out marketing, fundraising and development. This is because such activities ultimately benefit the School and the wider School community through, for example, raising funds for the School and providing support for current and former pupils.

The School must also comply with an additional condition where it processes special categories of personal information. The ICO's special data 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.

The School's grounds for processing special personal information will depend on the circumstances but may include the following:

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.

## 7 **Sending your information to other countries**

7.1 We may send your information to countries which do not have the same level of protection for personal information as there is the UK. For example, we may:

- store your information on computer servers based overseas; or
- communicate with you when you are overseas (for example, when you are on holiday or if you live in a different country).

7.2 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](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)

7.3 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.

7.4 We use e-tapestry by Blackbaud to as our fundraising and marketing database and Google Analytics to assess the way people use our website and open our mail. Blackbaud and Google are based in the US and your data in relation to that processing is likely to be transferred to the US. Blackbaud and Google have stated that they comply with the EU-US Privacy Shield Framework as set out by the US Department of Commerce regarding the collection, use and retention of personal information from European Union member countries. It is subject to enforcement by the Federal Trade Commission. This decision includes all their wholly-owned US subsidiaries.

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 check that they are contracting with us using model data protection clauses provided by the European Commission. If you would like more information about the safeguards that are in place please contact the Development Director.

## **8 For how long do we keep your information?**

- 8.1 We will keep information about you for as long as we need to do so, in compliance with our data protection and other legal obligations. For example, we will need to retain contact details for you for so long as you want to be part of the school community so that we can communicate with you.
- 8.2 We may 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.
- 8.3 We may 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.
- 8.4 The School may 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 information is used by the School more widely please contact the Finance Director.

## **9 What decisions can you make about your information?**

- 9.1 You have a number of rights regarding your information. Your rights are as follows:
  - 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 a computer; and
  - 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.

9.2 The Development Director can give you more information about your data protection rights.

## 10 Further information and guidance

10.1 The Development Director is the person responsible at our school for managing how we look after personal information and deciding how it is shared in relation to marketing, fundraising and development.

10.2 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.

10.3 This notice is to explain how we use your personal information. The Development Director can answer any questions which you may have.

10.4 Please speak to the Development Director if:

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

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office - [ico.org.uk](https://ico.org.uk).