



Tormead

SCHOOL

Privacy Notice (Development and Alumnae)

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1. Introduction

1.1 Tormead School is an independent day school for girls aged 4 to 18. Located in Guildford, the school currently has approximately 780 pupils. Tormead is a limited company (registration number 00485947) and is a registered charity with the Charity Commission (registration number 312057). We rely on the philanthropic support of the School community to further our charitable objectives. These are to provide academic education of high quality, extended by a broad range of cultural and sporting opportunities and supported by a responsive pastoral system and firm moral framework. The school's registered address is Tormead School, Cranley Road, Guildford, Surrey GU1 2JD; contact telephone number 01483 575101.

1.2 The School promotes the impact of giving and seeks to keep the community informed of opportunities to help should they wish to.

1.3 The School is committed to maintaining the highest standards of ethical behaviour in fundraising. To ensure a quality supporter experience we align our fundraising practices with the guidelines set out by the Fundraising Regulator.

1.4 Tormead is a Data Controller for the purposes of 'Data Protection Law' and this Privacy Notice is applicable to all pupils at school – past, present and prospective. For the purposes of this Privacy Notice, 'Data Protection Law' comprises the following:

- The Data Protection Act 2018 and related legislation
- The General Data Protection Regulation
- The Privacy and Electronic Communications Regulations 2011
- The Protection of Freedoms Act 2012

2. Who This Policy Applies To

2.1 This notice applies to:

- Past pupils and staff
- Current parents and staff

3. About This Policy

3.1 This policy is intended to provide information about how the school collects, uses (or "processes") and shares personal data about our past pupils, and their rights in relation to the personal data we hold in relation to the alumnae and external relations activities.

3.2 This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Past pupils/leavers are encouraged to read this Privacy Notice and understand their rights and obligations.

4. Data Processing

4.1 The School's alumnae and some external relations activities are carried out by the Development and Alumnae Office (the "Office"). The aim of the Office is to provide everyone in the community with opportunities to meet and remain an active part of the School throughout their lives. It was established in 2021 and engages all members of the Tormead community, including alumnae, parents and staff. The Office is part of Tormead School.

4.2 The School uses ConnectTormead to manage its Development and Alumnae database. ConnectTormead is a member's site open to the whole Tormead community (but primarily used by alumnae) and was founded in 2021.

4.3 This notice relates solely to how the School uses your personal data for alumnae and external relations purposes. For more information about how else the School uses your information more widely (for example, in relation to the provision of education to pupils) please visit <https://www.tormeadschool.org.uk/admissions/policies/> or contact the Bursar for a copy of the relevant privacy notices. If you have any questions about this notice, please contact the Deputy Head (External Relations).

4.4 You can also contact any other member of the development team about any of the matters set out in this notice if the Deputy Head (External Relations) is not available. All contact details can be found at the end of this notice.

A) What is personal information?

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

B) What information does the school hold about you?

4.6 The School holds information about pupils, alumnae, parents, staff, former parents, former staff, and other supporters. We hold a specific database with information about alumnae, parents, staff, former parents, former staff and our supporters. You provide us with information about yourself during the course of our relationship with you, by becoming a parent, pupil or member of staff or attending events. We may also collect personal information using online survey platforms, which allow us to do this in an easy-to-use manner, for example Google Forms.

4.7 In addition, we may obtain your information from other public sources such as media articles and online resources (e.g. Google, Zoopla, LinkedIn and social media sites).

4.8 We may hold information such as:

- 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;
- 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;

- How you like to hear from us e.g. whether you have signed up to receive emails from us;
- Your involvement with us e.g. if you carry out mentoring of current pupils or attend events;
- Records of any donations;
- Your Gift Aid status if applicable;
- Any dietary requirements for catering purposes;
- Photographs and recordings of you taken at events that you attend; and
- Any disability or medical conditions so that we may make reasonable adjustments for you.

C) Why do we use your personal information?

4.9 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 keep you informed about what is happening at the School, for example, by sending you a copy of the School newsletter, and e-news;
- In connection with school fundraising priorities (such as bursaries or capital development) and opportunities to make a donation; and
- In connection with the other ways in which you might support the School (such as when you volunteer, for example to help at careers events or with mentoring opportunities).

4.10 We will 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. If you tell us that you do not want to be contacted for any of these purposes, we will respect that.

4.11 To ensure our communications are relevant and timely, and to provide an improved experience for each member of our community, we build profiles of supporters so we can tailor our communications appropriately. This type of research also allows us to make sure we use our resources effectively, so we don't waste them or your time. Understanding the background, capacity and willingness to support specific Tormead projects helps us to make appropriate requests that are sensitive to the preferences and interests of each supporter and are at a level that is suitable to the individual. Importantly, it enables us to raise more funds, sooner, and more cost-effectively, than we otherwise would.

4.12 When carrying out research we may analyse factors relating to you in order to make sure we only contact you with the most relevant communications for you and your family. In doing this, we may use additional information from third party sources when it is available, which is compiled using publicly available data which may include searching social media sites such as Facebook and LinkedIn, the Sunday Times Rich List, websites such as Zoopla and search engines such as Google.

4.13 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, the Charity Commission, Zoopla, Business Week and related media articles. This is to comply with our legal obligations and in line with our Gift Acceptance Policy and Fundraising Policy.

4.14 We will take photographs or videos of you to use in our publicity or on our social media platforms and website and to keep alumnae and the Tormead community informed about what we

have been doing. If we consider that the photograph or video is more privacy intrusive then we may ask for consent first.

4.15 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. In addition, our ConnecTormead site will also collect information from you when you:

- Visit this website;
- Create or update your online profile;
- Post content on to this website or other websites and social media sites managed by the School;
- Take part in an event;
- Attend a meeting with us and provide us with information;
- Contact us in any way including online, email, phone, SMS, social media or post;
- Open an email sent from this website;
- Send a message via the direct messaging system on this website;
- Leave Tormead School and we transfer some basic details about you from the main Tormead School database into our alumnae database.

4.16 We also facilitate interaction between members of the School community.

D) Sharing your information with third parties.

4.17 The School will never sell personal information to a third party. When third parties are used, these are to improve the service we give to those who wish to stay in touch with the School.

4.18 We may share your information with:

- Event booking platforms such as Eventbrite or TryBooking;
- Event venues when external to Tormead for the administration of events which you are attending;
- Fundraising consultants for the purposes of supporting certain elements of our fundraising, such as telephone campaigns;
- Wealth screening agencies, in order to help us better understand the School's supporters;
- Email programs such as MailChimp to send you timely and relevant communications;
- Third party donation platforms, for example from Stripe who manage the School's online donations; and
- HMRC for Gift Aid purposes.

4.19 We may also need to share information with:

- Our legal advisers for the purpose of obtaining legal advice;
- Emergency services if there is an emergency, for example, if you are hurt whilst on school premises or at one of our events;
- Contractors to help us with our work (e.g. a printing company for our literature) or where we store our database in the cloud;
- We use a third-party screening company to comply with our anti-money laundering obligations.

4.20 The School only shares information about alumnae who have chosen to become members of ConnecTormead

E) Our legal bases for using your information

i) Consent

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

4.22 If we ask 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 Deputy Head (External Relations) at alumnae@tormeadschool.org.uk or update your setting on ConnecTormead.

ii) Legitimate Interests

4.23 This means that the processing is necessary for legitimate interests except where your interests and fundamental rights override our legitimate interests. We rely on legitimate interests to use your information for all the purposes described above unless any of the alternative bases in the table below apply:

- 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 promoting the impact of giving to the School and keeping the community informed of opportunities to help, for example, raising money for the bursary fund or new buildings, in a way that is both cost-effective and responsive to the individual donor's needs;
- 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;
- Ensuring we comply with our legal obligation.

4.24 If you object to us using your information where we are relying on our legitimate interests as explained above, please speak to the Deputy Head (External Relations). We are relying on legitimate interests for all the purposes for which we use your information as described under "Why do we use your personal information" above (save for those circumstances where we seek your consent).

iii) Necessary for a contract

4.25 We may need to use your information 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 a concert that you want to attend.

iv) Legal obligation

4.26 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.

v) Vital interest

4.27 For example, to prevent someone from being seriously harmed or killed.

vi) Public interest

4.28 The School considers that it is acting in the public interest carrying out fundraising and alumnae and external relations. This is because such activities ultimately benefit the School and the wider School community through, for example, promoting the impact of giving to the School and providing support for current and former pupils.

4.29 The School must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information relating to 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.

4.30 The Schools' bases for processing special personal information will depend on the circumstances:

vii) Vital interests

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

viii) Legal claims

4.32 The processing is necessary for the establishment, exercise of defence of legal claims. This allows us to share information with our legal advisors and insurers. These conditions may also apply if we ever need to process information about criminal convictions and offences.

ix) Substantial public interests

4.33 The School is 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 or in respect of our interactions with you. For example, if we have to make an adjustment because of a disability or medical condition you have.

F) Sending your information to other countries.

4.34 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.

4.35 The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

4.36 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.

4.37 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.

G) For how long do we keep your information?

4.38 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.

4.39 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.

4.40 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.

4.41 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 development or alumnae and external relations 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 Bursar.

4.42 Our information and records management policy sets out how long we keep different types of information. Please email data@tormeadschool.org.uk if you would like a copy of this policy.

H) What decisions can you make about your information?

4.43 You have the following rights regarding your information:

- i) **Rectification:** if information held about you by the School is incorrect you can ask us to correct it;
- ii) **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;
- iii) **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;
- iv) **Portability:** you can request the transfer of your information to you or to a third party in a format that be read by computer in certain circumstances;
- v) **Restriction:** 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;
- vi) **Object:** you may object to us using your information where:
 - We are using it for direct marketing purposes (e.g. to send you the School magazine);
 - The legal bases on which we are relying is legitimate interests. Please see the section “[Our legal bases for using your information](#)” above;
 - We are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons.

I) Further information and guidance

4.44 The Bursar is the person responsible at the School in deciding how it is shared in relation to alumnae and external relations. The Bursar can give you more information about your data protection rights.

4.45 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.

4.46 This notice is to explain how we use your personal information. The Deputy Head (External Relations) can answer any questions which you may have regarding the use of your personal information. Please speak to the Deputy Head (External Relations) if:

- You object to us using your information for school marketing purposes, e.g. to send you information about fundraising events. We will stop using your information for school 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.

4.47 If you consider that we have not acted properly when using your personal information, you can contact the Information Commissioner's Office - <https://ico.org.uk/>

Development Office

Tormead School, Cranleigh Road, Guildford, Surrey GU1 4BD
Tel: (01483) 575101 (ext. 286)
Email: alumnae@tormeadschool.org.uk

Bursar

Tormead School, Cranleigh Road, Guildford, Surrey GU1 4BD
Tel: (01483) 575101
Email: data@tormeadschool.org.uk

Date of last review: 27th June 2023

By resolution of the Governing Body

Mt Matthew Howse
Chair of Governing Body

Mr David Boyd
Head