THE PERSE SCHOOL
CAMBRIDGE

PRIVACY NOTICE – ALUMNI, FRIENDS and SUPPORTERS

WHAT THIS NOTICE IS FOR

This privacy notice is intended to provide information about how the School will use (or "process") Personal Data about individuals including alumni, friends and supporters for the purposes of maintaining a lasting, life-long relationship with the School. For information about how the School uses your Personal Data more widely (for example, in relation to being a current or former parent, a past pupil or in relation to employment), please ask the Data Processing Manager for a copy of the appropriate privacy notice. The Data Processing Manager can be contacted using the following contact details: The Data Processing Manager, The Perse School, Hills Road, Cambridge, CB2 8QF.

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used.

This **Privacy Notice** applies alongside any other information the School may provide about a particular use of Personal Data, for example when collecting data via an online or paper form.

This **Privacy Notice also** applies in addition to the School's other relevant terms and conditions and policies, including:

- the School's Records Management Policy and Records Retention Schedule;
- the School's Data Protection policy
- the School's IT policies.

Anyone who works for, or acts on behalf of, the School (including staff, sports centre staff, summer school staff, volunteers, directors, governors and third parties such as catering staff, peripatetic music teachers, external facilities hirings, contractors and visitors) must also be aware of and comply with this Privacy Notice which also provides further information about how Personal Data will be used.

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed the Director of ICT as the Data Processing Manager who will deal with all day-to-day requests and enquiries concerning the School's use of Personal Data (see section on Your Rights below). The Bursar has ultimate responsibility for all Data Protection.

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties, the School may process a wide range of Personal Data about individuals as part of its daily operation.

Uses of Personal Data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

The table below contain a general description of the different legal bases for processing Personal Data.

Legitimate interests

This means that the School is using your Personal Data when this is necessary for the School's (or sometimes a third party's) legitimate interests except when your interests and fundamental rights override our legitimate interests.

Specifically, the School has a legitimate interest in:

- protecting the School's reputation;
- facilitating the efficient operation of the School; and
- ensuring that all relevant legal obligations of the School are complied with.

In addition, your Personal Data may be processed for the legitimate interests of others.

Performance of a task carried out in the public interest (or carrying out public tasks)

The following are examples of when we use your Personal Data to perform tasks in the public interest:

- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

Consent

Where the School is relying on consent as a means to process Personal Data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please be aware however that the School may have another lawful reason to process the Personal Data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

The School must also comply with an additional condition where it processes special categories of Personal Data. These special categories are as follows: Personal Data 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 additional conditions for processing special categories of Personal Data are:

Substantial public interest

The School is also allowed to use special categories of Personal Data were doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above.

Legal claims

We are allowed to use your Personal Data if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers.

The School expects that the following uses may fall within one or more the categories listed in the tables above.

- sending publications (e.g. alumni magazines and updates about the School) (**legal basis:** legitimate interests);
- conducting surveys, including research on when and whether particular donations or funding appeals may be of interest (**legal basis:** legitimate interests);
- sending tailored proposals, appeals and requests for donations (**legal basis:** legitimate interests);
- sending details of volunteering opportunities (**legal basis:** legitimate interests, public interest);
- invitations to alumni and other School events (**legal basis:** legitimate interests);
- the promotion of other opportunities and services (e.g. offers and opportunities available through the School's network of alumni groups) (**legal basis:** legitimate interests);
- research in order to improve its understanding of its alumni and supporters, inform its fundraising strategy, which may include wealth screening and target its communications more effectively (**legal basis:** legitimate interests);
- internal record keeping, including the management of any feedback or complaints (**legal basis:** legitimate interests); and
- administrative purposes (e.g. in order to process donations or to administer events.) (**legal basis:** legitimate interests).

Communications may be sent by post, telephone or electronic means (principally email), depending on the contact details we hold, and the preferences expressed about the types of communications used. In addition to our general principle of adopting legitimate interest as the legal basis for data processing, the Privacy and Electronic Communications Regulations 2003 (PECR) apply to electronic fundraising communications.

MORE THAN ONE BASIS

In some cases, we rely on more than one basis for a particular use of Personal Data. For example, the School will rely on contract, legitimate interests and public interest bases when using Personal Data to provide children with an education. The basis that we will rely on for a particular purpose may vary depending on the circumstances.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

- details of your education (e.g. clubs and activities you were involved in, dates of attendance)
- your contact details (we update these whenever you let us know that they have changed)
- details about your family (e.g. your marital status, the name of your partner or spouse)
- Personal Data provided by you for a specific purpose (e.g. disability and dietary preferences for event management purposes)

- your communication preferences, to help us provide tailored and relevant communications

Based on Personal Data which you provide to us and, in some cases, publicly available information we also record:

- financial information including:
    - your history of donations made to the School
    - your ability and willingness to make donations, including our assessment of your income and whether particular donation or funding appeals may be of interest to you
    - your philanthropy and other giving, including donations to other organisations and other support that you provide (e.g. details of volunteering roles)
- your career highlights and other life achievements
- information about your areas of interest and extra-curricular activities

HOW THE SCHOOL COLLECTS DATA

Generally, the School receives Personal Data from the individual directly. A significant proportion of the information we hold on alumni, friends and supporters comes from them (for example, by filling in a form, or by corresponding with us by telephone, email or otherwise). Some pupil data held in the pupil database will be transferred to the School's alumni database.

However in some cases Personal Data may be supplied by third parties (for example another school) or collected from publicly available resources.

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

Occasionally, the School will need to share Personal Data relating to its community with third parties, such as professional advisers and specialist service providers (e.g. mailing houses, fundraising consultants).

For the most part, Personal Data collected by the School will remain within the School and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Where third parties are engaged, they will be required to confirm their compliance with Data Protection Law.

The School will recognise donations publicly where appropriate, such as in its annual Donor Report or Benefactors' Board, unless you ask to remain anonymous. The School will respect any requests to remain anonymous, however it may disclose details of any donor where it is required to do so by law, by any governmental or other regulatory authority, or by order of a court.

HOW LONG WE KEEP PERSONAL DATA

The School will retain your Personal Data securely and indefinitely in support of your lifelong relationship with the School. The retention of data is outlined in the Records Retention Schedule. If you have any specific queries about how this schedule is applied or wish to request that Personal Data that you no longer believe to be relevant be considered for erasure, please contact the Data Processing Manager. However, please bear in mind that the School may have lawful and necessary reasons to hold on to some data.

YOUR RIGHTS

Individuals have various rights under Data Protection Law to access and understand Personal Data about them held by the School, and in some cases ask for it to be erased or amended or for the School to stop processing it, but subject to certain exemptions and limitations.

Any individual wishing to access, erase, restrict processing, obtain, objector amend their Personal Data, should put their request in writing to the Data Processing Manager.

The School 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 one month in the case of requests for access to Personal Data. The School will be better able to respond quickly to smaller, targeted requests for Personal Data. If the request is manifestly excessive or similar to previous requests, the School may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.

You should be aware that certain data are exempt from the right of access. These may include information which identifies other individuals, or information which is subject to legal professional privilege.

SENDING INFORMATION TO OTHER COUNTRIES

When the School sends Personal Data outside of the UK, we have to consider if the other country has the same level of protection for Personal Data as there is in the UK. Some countries are considered by the UK Government to have adequate rules, and this includes all of the European Economic Area and some other countries, such as, New Zealand, Argentina and Japan.

In certain circumstances, we may send your information to countries which do not have the same level of protection for Personal Data as there is in the UK. For example, we may store your information on cloud computer storage based in the USA.

We will provide you with details about where we are sending your Personal Data, whether the country has an adequacy decision and if not the safeguards which we have in place outside of this Privacy Notice.

If you have any questions about the safeguards that are in place, please contact the Data Processing Manager.

WHAT DECISIONS CAN YOU MAKE ABOUT YOUR INFORMATION?

Data protection legislation gives you a number of rights regarding your Personal Data. Your rights are as follows:

- **Rectification**: if Personal Data is incorrect, you can ask us to correct it.
- **Access**: you can also ask what Personal Data we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this data about you, where it came from and what types of people we have sent it to.
- **Deletion**: you can ask us to delete the Personal Data that we hold about you in certain circumstances. For example, where we no longer need the data.
- **Portability**: you can request the transfer of your Personal Data to you or to a third party in a format that can be read by computer. This applies where (a) the data has been provided by

you; (b) the basis that we are relying on to process your data is consent or contract (please see "Our legal bases for using your information below"); and (c) the data is being processed by us on computer.

- **Restriction**: our use of Personal Data about you may be restricted in some cases. For example, if you tell us that the data is inaccurate, we can only use it for limited purposes while we check its accuracy.
- **Object**: you may object to us using your Personal Data where:
    - we are using it for direct marketing purposes
    - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of you at a School event for historical reasons.

DATA ACCURACY AND SECURITY

The School will endeavour to ensure that all Personal Data held in relation to an individual is as up to date and accurate as possible. Individuals should please notify the Alumni and Development Office of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate Personal Data about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the School may need to process your data, of who you may contact if you disagree.

The School will take appropriate technical and organisational steps to ensure the security of Personal Data about individuals, including having policies concerning the use of technology and devices, and access to school systems. All staff and governors will be made aware of this Privacy Notice and their duties under Data Protection Law and receive relevant training.

THIS PRIVACY NOTICE

The School 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

Any comments or queries on this Privacy Notice should be directed to the Data Processing Manager using the following contact details The Data Processing Manager, The Perse School, Hills Road, Cambridge, CB2 8QF.

If an individual believes that the School has not complied with this Privacy Notice or acted otherwise than in accordance with Data Protection Law, they should notify the Data Processing Manager. The individual can also 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.

January 2026