

Cothill House

Privacy Notice for Alumni, Donors, and Supporters

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CONTACT:

Compliance Lead - Jo Fitroy-Ezzy
Cothill House
compliance@cothilltrust.org

Privacy Notice – alumni, donors, supporters

1. Background and Introduction

Background

Cothill House (the School) will celebrate the 150th anniversary of its founding in 2020. The School is proud of the many alumni who have attended and shaped the school over those 150 years and who make up its wider community. The School is also extremely grateful for the generosity of its donors and supporters, groups made up of both alumni and parents and those who are linked to the School in other ways, united by a motivation to ensure the boys in the School's care experience the very best education possible.

The School wishes to maintain and develop lifelong relationships with its alumni, donors, and supporters and hopes that Cothill House old boys will enjoy and continue to benefit from being part of this rich network of former pupils once they have left the School. The School believes that lifelong friendship with its alumni, donors, and supporters plays a major role in the advancement of the School and has a positive impact on the lives of current and future pupils.

Introduction

The purpose of this Privacy Notice is to explain how the School ('we') holds and uses personal data about alumni, donors and supporters ('you') and how we use it for alumni, fundraising and supporter relations. The School is committed to maintaining your confidence and trust with respect to your privacy. We will be transparent about the data we are collecting about you, where the data comes from, how we use the information we hold about you, and the choices you can make.

The School sits within the charity the Cothill Trust (the Trust) and is committed to maintaining your trust and confidence in relation to your privacy. The overarching purpose of collecting and processing your data is to provide you with the best possible experience of being an alumnus, donor, or supporter. We also wish to ensure that any approaches we may make to ask for your voluntary or financial support in relation to fundraising or alumni relations, are professional and relevant to you. The Trust is registered with the Fundraising Regulator and the School will fundraise in accordance with best practice and in line with the Regulator's **Fundraising Promise** <https://www.fundraisingregulator.org.uk/code/fundraising-promise> .

2. Who we are and what we do

Who we are

For the purposes of the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR, which came into force in May 2018), the Trust is the 'data controller' of data about alumni, donors and supporters. The data itself will be 'processed' by the School strictly in accordance with the DPA and GDPR. **This Privacy Notice should be read in conjunction with the Trust's Privacy Statement for Alumni, Donors and Supporters** which is available on its website www.cothilltrust.org. The Trust also has a full Data Protection Statement available on its website.

The postal address of the School is:

Cothill House
Nr. Abingdon
Oxfordshire OX13 6JL

For any queries or questions about this Notice, please contact:

Jo Fitzroy-Ezzy (Compliance Lead, Trust and Cothill House)
Director of Marketing and Communications
Cothill Trust
7 Cothill
Abingdon
Oxon OX13 6JN
Email – compliance@cothilltrust.org

What we do

The School's alumni relations and development activity exist to develop lifelong relationships with and amongst our alumni, donors and supporters. We would like to help you stay connected with each other and with the school's news, events, reunions, volunteering opportunities, fundraising priorities and progress updates that are relevant to you.

We fundraise to ensure that through the generosity of our supporters, the school continues to create the best educational environment within which our boys can fulfil their potential and our superb teaching staff can continue to be creative and inspirational. Philanthropic support can be sought for bursaries, essential facilities or special projects and activities.

The information collected enables the School to undertake the activities described above.

3. How we collect information

The School collects information in the following ways: directly during your ongoing relationship with us; from publicly available sources; from third parties providing us with services or acting on our behalf. The amount of data collected and held depends on the frequency and nature of your interactions with us. Information may be gathered during the lifetime of our relationship with you.

When we collect personal information on our forms, we will make it clear whether there is a legal requirement for you to provide it, and whether there is a legal requirement on the school to collect it. If there is no legal requirement then we will explain why we need it and what the consequences are if it is not provided.

We will only hold information necessary to support the relationship appropriately and ensure that you have the best experience possible in your contact with us.

Categories of information we may hold and process include:

Biographical information, for example:

- Personal information such as your name, title, contact details, date of birth, marital status, partner and relevant family details
- Characteristics information, such as gender, age

- For past pupils, information relating to time at the School, for example dates of attendance, subject choices, involvement in sports, teams, clubs and societies
- Employment information, including current employment and professional activities
- Information about your relationship to relevant trusts or companies, eg membership on boards of trustees
- Your interests, activities, and accolades
- Public social media information, for example LinkedIn, website or blog

Information about your interactions with us, for example:

- Your communication preferences (phone, email, post etc)
- Record of your communications with the School and the Trust
- Record of your attendance at School or Trust events, including any payments made
- Record of your connections with other alumni or staff
- Record of any membership of School or Trust social media groups, eg, Facebook or LinkedIn
- Record of offers of support and of voluntary work you have undertaken for the School or Trust

Gift information, for example:

- Current and past donations and pledges, and records of projects you have supported
- Record of any current giving arrangements
- Recognition requests, including any requests for anonymity in relation to your giving
- Thank you letters and donor reports
- If you have given it, an indication of your intent to leave a legacy
- Our understanding of your likely philanthropic interests either provided by you or from information in the public domain
- Any financial information required to process your gifts

Special Category personal data, for example:

- Health or dietary information, as provided by you to allow us to adjust the some of the services we provide

4. How we use your information

We process your personal data in support of the School's alumni, donor and supporter relations and fundraising activity. The following are non-exhaustive examples of the way in which your information may be used.

Alumni relations:

- To offer a programme of old boy events relevant to your interests, including networking and reunion events, sports events, concerts and dinners
- To keep you up to date with news about the school and school events
- To provide you with information about alumni benefits and services
- To let you know of volunteering opportunities at the school including mentoring and speaking opportunities
- To ensure that we interact with you appropriately and offer relevant content when you are using our digital communications and platforms

Philanthropy and donor care:

- To ensure that our fundraising efforts are efficient and cost-effective, and approaches for support are based, as far as possible, on an understanding of what may interest you
- To invite you to support fundraising projects, at all times being mindful of fundraising best practice and the Fundraising Promise.

- To undertake all administration and activity relevant to processing, acknowledging and communicating the impact of any gift you may choose to make.
- To seek out potential supporters and assess feasibility of projects, we may use publicly available information and recommendations from others to determine those who might have an interest in making a major gift to the school. We may undertake this research ourselves in-house or, as a very small school with limited resources, use the services of specialist, trusted, third-party research agencies such as “Prospecting for Gold” to gather information from publicly available sources (for example, Companies House, social networks such as LinkedIn, news archives, company websites or property registers) to inform a general assessment of your possible gift capacity and likely interest in the relevant project. A ‘legitimate interest assessment’ will be carried out in advance of undertaking any such activity. We will also consider whether a data protection impact assessment needs to be carried out. Only relevant publicly available information may be added to your record. By doing this, the School can focus its conversations with you about fundraising and volunteering in the most effective and efficient way and ensure that you are provided with an experience as an alumnus, donor or supporter which is appropriate for you.
- We may also carry out due diligence on potential donors using only publicly available information in order to comply with our gift acceptance policy and to fulfil our legal responsibilities such as money laundering regulations.

External communications and internal reporting:

- With your permission, we may publish your name to recognise a gift, or work with you to create a copy to be included in publications or on the website (eg, stories about alumni events and successes, or fundraising campaign updates and reports)
- We may use your personal data for operational reporting in order to evaluate progress and improve our services. We will only use the data required and reports will always be anonymised or pseudonymised where appropriate.

5. The legal basis for processing your data

There are a number of legal bases for the processing of personal data. We will only use your personal data where the law allows us to do so. A brief explanation of the legal bases most likely to apply to the use of your data is set out below:

- **Consent:** where you have given clear consent for us to process your personal data for a specific purpose.
- **Legitimate interests:** where processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect your personal data which overrides those legitimate interests.
- **Legal obligation:** where processing is necessary to fulfil a legal obligation
- **Contract performance:** where processing is necessary to fulfil a contractual obligation

The following table provides a non-exhaustive list linking some of the ways in which your data may be used with the relevant legal basis:

Process	Legal basis			
	Alumni	Donors	Supporters (including volunteers)	Others (e.g. event guests)
Sending communications about School or Trust news and updates, event invitations, volunteering opportunities, and/or benefits and services	Legitimate interest	Legitimate interest	Legitimate interest	Legitimate interest
Maintenance of an alumni, donor, and supporter database, including your contact details, communication history and preferences, and details of your career and interests	Legitimate interest	Legitimate interest	Legitimate interest	N/A
Volunteering	Consent	Consent	Consent	N/A
Event ticketing paid	Consent and contract performance	Consent and contract performance	Consent and contract performance	Consent and contract performance
Event ticketing unpaid	Consent and contract performance	Consent and contract performance	Consent and contract performance	Consent and contract performance
Gift processing	N/A	Legitimate Interest and Legal Obligation	N/A	N/A
Claiming Gift Aid	N/A	Legitimate Interest and Legal Obligation	N/A	N/A
Data appending and cleaning	Legitimate interest	Legitimate interest	Legitimate interest	Legitimate interest
Use of data sources held elsewhere within the Trust	Legitimate interest	Legitimate interest	Legitimate interest	Legitimate interest
Data analysis	Legitimate interest	Legitimate interest	Legitimate interest	Legitimate interest
Fundraising*	Legitimate interest [or consent	Legitimate interest [or consent	Legitimate interest [or consent	Legitimate interest [or consent
Research into potential donors[**]	Legitimate interest [or Consent]	Legitimate interest [or Consent]	Legitimate interest [or Consent]	Legitimate interest [or Consent]

Wealth Screening[**] <i>To establish project feasibility and identify potential supporters</i>	Legitimate interest [or Consent]	Legitimate interest [or Consent]	Legitimate interest [or Consent]	Legitimate interest [or Consent]
Management of volunteer committees	Legitimate interest [or Consent]	Legitimate interest [or Consent]	Legitimate interest [or Consent]	Legitimate interest [or Consent]

* Fundraising activities are undertaken by various communication channels, including post, telephone, email, and face-to-face contact. The School complies with the legislation applicable to each channel, alongside your own communications preferences, and will seek your consent to such communications where required.

** The School is of the view research and processing of this type is within the reasonable expectations of alumni, donors, and supporters to whom we have provided a copy of this Privacy Notice and who have not objected to such processing.

6. Future changes

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose. Please note that we may process your data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

This Privacy Notice may be updated from time to time in order to reflect changes in the data that we process and how such data is processed. Where there has been a significant update we will ensure alumni, donors and supporters are notified of the change via our website and other communications channels.

The School maintains a *Record of Data Processing* activities. The can be requested from the School's Compliance Lead.

7. Do we share your information with third parties?

We will not share information about you with third parties without your consent unless the law allows us to. We do not and will not sell your data.

The School benefits from a network of individuals who offer their time and expertise to the School on a voluntary basis, for example by serving on School or Trust boards, or assisting with alumni or development projects. On occasion the School may share relevant data with these individuals under appropriate circumstances. Data will be shared securely and in line with relevant policies including the School's Data Protection Policy.

The School may need to share your data with the Trust and its constituent parts, or with third parties working on our behalf. In relation to third parties, we will only do this in appropriate circumstances, by secure means, and with the relevant data sharing agreements in place.

Third parties do not keep your data after the processing is complete. Third parties may include, but are not limited to: mailing houses, printers, organisations providing databases or alumni networking platforms,

supporter market research, survey tools or payment services (eg, direct debit, online donation processing) or other business-related support.

Our disclosures to third parties are lawful because one of the following reasons applies:

For ordinary personal data uses,

- we collect with your consent
- where it is necessary for the performance of a legal obligation to which the School is subject
- where it is necessary for the legitimate interests of the School
- where processing is necessary to fulfil a contractual obligation

For Special Category Personal Data (i.e. sensitive personal information) uses:

- We collect with explicit consent.

8. How we protect your data

Alumni, donor, and supporter data is held securely on the School's administrative database, 'Isams'.

Data is treated confidentially and sensitively and access is limited to those members of School staff responsible for developing, delivering and implementing alumni, donor, and supporter programmes, who will process data in line with this Privacy Notice and the School's *Data Protection Policy* which can be requested from the Compliance Lead.

9. How long we keep your personal information

We only keep your information for as long as we need it or for as long as we are required by law to keep it.

When determining how long we should retain your personal data we take into consideration our legal obligations and tax or accounting rules, for example information we hold relating to gifts and donations will be retained in line with our legal obligations under HMRC and the Charity Commission.

Where you have pledged a legacy gift, it will be necessary to retain your data until your gift is received, so that we can identify the gift against that pledge.

When we no longer need to retain personal data, we ensure it is securely disposed of.

Full details are given in our *Records Retention Policy* which can be requested from the School's Compliance Lead.

10. Your rights

You have the right to:

- Ask for access to your personal information
- Ask for rectification of the information we hold about you
- Ask for the erasure of information about you
- Ask for our processing of your personal information to be restricted
- Data portability

- Object to us processing your information
- Withdraw your consent at any time where processing is based on consent.

If you want to use your rights, for example, by requesting a copy of the information which we hold about you, please contact the can be contacted using the details set out below.

More information about your rights is available in our Data Protection Policy. You can request a copy of this policy, or any other policy referred to in this document from the Compliance Lead.

If at any time you are not happy with how we are processing your personal information then you may raise the issue with the Compliance Lead, Jo Fitzroy-Ezzy (Compliance Lead, Trust and Cothill House).

Jo Fitzroy-Ezzy (Compliance Lead, Trust and Cothill House)
Director of Marketing and Communications
Cothill Trust
7 Cothill
Abingdon
Oxon OX13 6JN
Email – compliance@cohilltrust.org

If you remain unhappy with the outcome you can contact the Information Commissioner's Office.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Last updated – 8 March 2019

Emma Davidson – Director of Development