

FHS Privacy Notice for Alumni, Friends & Supporters

This policy applies to:

Francis Holland Regents Park Francis Holland Sloane Square Francis Holland Prep

Where there are differences between the schools these have been clearly highlighted.

Policy owner	Trust: Chief Operating Officer
Type of policy	Regulatory – N/A Informative – Provide information to Alumni, Friends & Supporters as to how their personal information is stored and used.
Last reviewed / approved by / date	SLTs: March 2024
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Next council review due	Governance and Nominations Spring 2025
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Circulation	<input type="checkbox"/> Trust Website <input checked="" type="checkbox"/> Schools' Websites <input checked="" type="checkbox"/> Schools' Sharepoints <input type="checkbox"/> FHS People All policies are available from the Trust Office, Francis Holland Schools Trust, 35 Bourne Street, London, SW1W 8JA
Linked Policies	Data Protection Policy

Revision History

This section should be completed by the reviewer each time this policy is reviewed

Changes made [Brief description of edits]	Date
Format change	August 2024

FHS PRIVACY NOTICE FOR ALUMNI, FRIENDS & SUPPORTERS

INTRODUCTION

This privacy notice describes how Francis Holland Schools Trust (FHST) collects and uses personal information about pupils, in accordance with the UK General Data Protection Regulation (UK GDPR).

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relates to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

Our alumni, friends and supporters are extremely important to us, and this Privacy Notice is to help you understand **how** and **why** FHST collects personal information about you and **what** FHST does with that information. It outlines the types of information that FHST holds and how FHST uses it to provide services to our alumni, friends, and supporters. It also explains the decisions that you can make about your own information. FHST aim to be clear when FHST collect your personal information, and not do anything you would not reasonably expect.

WHO COLLECTS THE INFORMATION AND WHO ARE FHST?

FHST are The Francis Holland (Church of England) Schools Trust, also herein referred to as “the School” . FHST’s registered address is 35 Bourne Street, London SW1W 8JA.

The Marketing and Development Offices are departments of FHST that have responsibility for alumni relations, events, fundraising and charitable giving to our schools. FHST do this by offering a range of academic, social, and networking events, and publications. FHST also fundraises to support our schools’ students, teaching, research, and capital projects. The Marketing and Development Offices work in accordance with FHST’s Data Protection Policy and relevant legal regulations such as the General Data protection regulation (UK GDPR) and the Data Protection Act 2018.

DATA PROTECTION PRINCIPLES

FHST will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

WHAT IS PERSONAL INFORMATION?

Personal information is information that identifies you as an individual and relates to you. This includes your contact details. FHST may also hold information such as your religion or ethnic group. CCTV, photos, and video recordings of you are also personal information.

HOW AND WHY DO FHST COLLECT PERSONAL INFORMATION?

FHST set out below examples of the ways in which FHST use personal information and where this personal information comes from. Any personal data is stored securely, with access restricted to authorised staff only. This data is collected by the school during our relationship with students, alumni, donors, and supporters. Initially, personal information about students is transferred into our database from our MIS, in accordance with the Student Privacy Notice.

The vast majority of the information FHST obtains is directly from you; and if you interact with any other departments or schools within FHST, FHST may receive data from those areas. Similarly, FHST may receive information from recognised school volunteer groups (e.g. parent associations), clubs or societies, subject to their privacy notices. FHST may also obtain information from third parties FHST partner with, subject to those third parties’ own privacy practices. FHST always aim to keep your details up to date, and FHST will conduct projects to check the contact details FHST have for you are correct, and, where appropriate, update them.

As a result, some of the data may also be obtained from publicly available sources – for example, FHST may find a new address for you by using the Royal Mail’s National Change of Address database (NCOA). FHST may also use information from publicly available sources to conduct research to assess your inclination and capacity to support FHST financially or by volunteering your time. More information on these activities, and the legal bases on which FHST processes your data in pursuit of these activities, is below and you will always have the right to opt out of any or all forms of data processing. FHST value our relationship with you, and FHST use your personal information to ensure FHST contacts you in the most appropriate way, improve our services and to ensure FHST work efficiently and effectively.

Personal data held and processed by the Marketing and Development Offices may include:

- Biographical information including your name and date of birth;

- Your contact details and communication preferences;
- Your education history;
- Your clubs and societies affiliations and your other connections with the school;
- Your professional activities and employment;
- Your interests and extra-curricular activities;
- Information you have publicly shared on social media;
- Your volunteering activity for the school including alumni volunteering;
- Your family and partner/spousal details;
- Your relationships with other alumni, donors, and friends;
- Your donation history and wealth assessment information;
- Records of communications and interactions FHST have had with you;
- Your attendance at school events.

Please note that FHST do not collect or store any credit/debit card details. FHST are fully PCI-DSS compliant. Bank details used for processing Direct Debits are stored by a trusted third-party, under the Direct Debit Guarantee scheme.

HOW FHST USES YOUR PERSONAL INFORMATION?

The data FHST hold is used to support a full range of activities for our alumni and friends and to ensure that the ways in which FHST communicate with you, such as sending out school publications, inviting you to events, or advising you about our alumni benefits and fundraising priorities, are relevant and adhere to your chosen communication preferences.

Unless you have requested otherwise, personal information held about you is accessible to FHST, its schools and faculties, alumni associations, groups, and networks (included selected volunteers), alumni volunteers, and sports and other clubs associated with FHST. FHST may use it to pursue and support a full range of mutually beneficial alumni and supporter engagement and fundraising activities, where these do not override your fundamental rights and freedoms as a data subject. All external entities with whom personal information is shared and to whom FHST are not legally bound must sign a contract and/or a confidentiality and non-disclosure agreement which governs their use of the personal information before any transfer of personal information takes place.

Here are some further examples of how FHST may use your personal data:

- General administration (e.g. event management, processing of donations, internal record keeping);
- Seeking non-financial support (e.g. careers advice to students, sharing of expertise);
- From time to time to create a profile of your interests, preferences, and level of potential donations so that FHST can contact you in the most appropriate way and with the most relevant information;
- Enable alumni representatives to discharge their duties as volunteer helpers under the Marketing and Development Offices umbrella;
- FHST may use information about you if FHST needs this for historical research purposes or for statistical purposes;
- FHST may need information about any court orders or criminal petitions which relate to you. This is so that FHST can safeguard the reputation of the school or the welfare of any current students with whom you may come into contact during school or alumni events;
- FHST use CCTV to make sure the school site is safe. CCTV is not used in private areas such as toilets;
- FHST may take photographs or videos of you at events to use on social media and on the school websites to help promote our schools. If you have any concerns about the use of photographs and videos please contact the Marketing and Development Offices.

SHARING PERSONAL INFORMATION WITH THIRD PARTIES

Occasionally FHST may use consultants, experts, and other advisors to assist FHST in fulfilling its obligations and to help run our alumni services properly. FHST might need to share your information with them if this is relevant to their work but will ensure appropriate data-sharing agreements are in place before doing so. Personal information will only be kept by the third party for as long as it is required to fulfil its obligation to FHST and will then be destroyed.

If you interact with FHST through a third party (for example, supporting FHST via JustGiving or a crowdfunding page, Eventbrite, or through a recognised Trust volunteer or group) then FHST may obtain information about you from that third party. The receipt of personal information in this manner is subject to the third party's own privacy policy or the information they have provided to the data subject. Information obtained in this way is treated no differently to any other information held by FHST and is bound by the terms of this Privacy Notice as soon as it is received.

From time-to-time FHST may work in partnership with other charitable organisations contractually bound to FHST on joint fundraising initiatives and may, in limited circumstances, share your name and information about the nature of your relationship with FHST (e.g. the fact that you are an existing donor) with those organisations. FHST do this solely to ensure that you are contacted for these joint initiatives only by the most appropriate partner. In such cases all parties are bound by a contractual agreement governing the types and uses of the shared data and will not be permitted to retain the data nor use it for any other purpose (for example, fundraising beyond the joint project). Please note that these 'partnership approaches' encompass a few individuals who are likely to make major philanthropic gifts to the specific charitable area FHST is working in partnership to support.

FHST may use information it holds on you to tailor social media offerings related to FHST activities listed above. This means that you might see targeted content from us on social media channels where you have an account. FHST does this to ensure it is providing you with content that is most appropriate for you or may be of most interest to you. If you would prefer FHST did not tailor our messaging and content to you in a targeted way on social media please let us know. Please note this may still mean you receive and/or see content about FHST on social media channels, though it may not be tailored by us.

Tools may be used to help us improve the effectiveness of FHST's communications with you, including tracking whether the emails sent are opened and which links are clicked within a message. FHST also monitor website visits and use tools such as Google Analytics to improve our website and services.

Other instances in which FHST may share your data include:

- In accordance with our legal obligations, FHST may need to share information with the police.
- FHST may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- FHST may share some information with our insurance company, for example, where there is a serious incident involving you on FHST's premises.
- FHST may also need to share information if there is an emergency, for example, if you are hurt whilst on FHST's premises.

THE LAWFUL BASES ON WHICH FHST USE THIS INFORMATION

This section contains information about the legal basis that FHST is relying on when handling your information.

As part of our work, FHST processes and stores personal information relating to students, staff, alumni, current and potential supporters, and friends of FHST. FHST adheres to all relevant UK data protection legislation. FHST takes its data protection responsibilities seriously and ensures that the personal information FHST obtains is held, used, transferred, and processed in accordance with all applicable laws. When laws are updated, revised, or replaced, FHST will review our data processing practices as required by and in line with the most up-to-date UK legislation.

• LEGITIMATE INTERESTS

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

There is no requirement under EU or UK legislation for FHST to conduct alumni and supporter relations or fundraising, and FHST therefore rely on our legitimate interest as our legal basis for data processing for these activities wherever appropriate and possible. This is because alumni and supporter relations and fundraising:

- is of clear benefit to FHST and those who FHST can support because of this activity – through teaching, research and in society more broadly;
- has a limited impact on the privacy of students, alumni, staff and current and potential supporters, whose interests do not override our legitimate interests and the wider public interest;
- is reasonably expected by our students, alumni, staff, and current and potential supporters, who FHST do not wish to bother with disruptive consent requests when they are unlikely to object to processing.

FHST process the information outlined in this Privacy Notice in pursuit of our legitimate interests in:

- communicating with students, staff, alumni, and current and potential supporters;
- providing benefits, services, and offers to students, staff, alumni, and supporters;
- furthering FHST's educational charitable mission (which includes fundraising and securing the support of volunteers);
- enabling FHST to achieve its strategic and operational goals.

FHST may pursue these legitimate interests by contacting you by telephone, email, post, or social media, subject to your communications preferences. Information about how you can manage the ways that FHST contact you, including how to opt out from some or all contact from us, is outlined in the 'Your rights' section below.

Whilst FHST rely on legitimate interest as the legal basis for processing where this is appropriate and possible

FHST recognise that it is not the only lawful ground for processing personal information. As such, where appropriate, FHST will sometimes process your personal information using an alternative legal basis. For example if you are not a student or graduate but you fundraise or donate to FHST via a crowdfunding platform such as JustGiving, FHST may contact you with future opportunities to get involved only if you agree FHST may do so.

FHST may ask for your consent to use your information in certain ways. If FHST 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. If you would like to withdraw any consent given, or if you object to us using your information where FHST are relying on our legitimate interests as explained above, please speak to the Data Protection Coordinator.

- **NECESSARY FOR A CONTRACT**

Once you have joined the alumni body, FHST will need to use your information to fulfil our obligations under our contract with you. For example, FHST needs your name and contact details so that FHST can keep you updated on alumni events and what is happening at the school.

- **LEGAL OBLIGATION**

Where FHST needs to use your information to comply with a legal obligation, for example to report a matter to the courts, the local authority or the police when legally obliged to do so.

- **VITAL INTERESTS**

- For example, to prevent someone from being seriously harmed or killed; or to protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

- **PUBLIC INTEREST**

FHST considers that it is acting in the public interest when providing education.

- **ADDITIONAL CONDITIONS**

FHST must also comply with an additional condition where it processes special categories of personal information. These special 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.

- **SUBSTANTIAL PUBLIC INTERESTS**

The processing is necessary for reasons of substantial public interest.

- **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.

SENDING INFORMATION TO OTHER COUNTRIES

In storing personal data overseas, FHST will abide by European Commission regulations which state that personal data must not be stored outside the EEA unless the relevant country has an adequate level of data protection.

FHST may also send your information to other countries where FHST communicates with you when you are overseas (for example, during the summer holidays if you live in a different country). If the country that FHST is sending your information to is not a country within the EEA (which means the European Union, Liechtenstein, Norway, and Iceland) then it might not have the same level of protection for personal information as there is the UK.

YOUR RIGHTS: WHAT DECISIONS CAN YOU MAKE ABOUT YOUR INFORMATION?

FHST will always try to ensure that the personal information FHST holds for you is up-to-date, reasonable, and not excessive. You will always have the right to:

- Be informed as to how FHST use your personal information (via this Privacy Notice);
- Access or request a copy of the data FHST hold about you;
- Update, amend or rectify the personal information FHST hold about you;
- Change your communication preferences at any time to restrict how FHST process your personal information, or opt out of some or all communication from us;
- Ask us to remove your personal information from our records. Please note that in such instances FHST must retain a 'skeleton record' for you to ensure FHST does not contact you again. There may also be data which FHST are legally obliged to keep;
- Withdraw consent, where it is used as a legal basis for processing;
- Object to or restrict the processing of your personal information for any of the purposes outlined

above.

Please note that in some instances FHST may be required to contact you outside your preferences because FHST are legally obliged to do so (for example, to provide a Direct Debit Guarantee and/or Gift Aid confirmation) or in response to an action you have taken (for example, to post you a gift thank you letter and receipt, or tickets to an event you have registered for). Beyond any legal obligation or action in response to a positive action by you, your contact preferences will always stand until you inform us otherwise.

Please also note that as a student or graduate if you opt out of an activity through a platform hosted by a third party FHST are partnering with to deliver a service your preferences as collected on that platform may only relate to the activity that platform facilitates. For example, if you are a student or graduate and you opt out of FHST keeping you informed by email whilst fundraising through JustGiving this will mean you do not receive future emails about crowdfunding opportunities, crowdfunding events, or stewardship related to crowdfunding. Any opt-in or opt-outs to or from our updates via Eventbrite only affect communications FHST may send via Eventbrite. If you opt out of our email communications via Mailchimp please note that this applies to our 'one too many' communications only, and FHST may still contact you by email 'one to one' (e.g. direct contact from a staff member about something specific to you personally). You also have the right to opt out of 'one to one' communication by contacting us directly. FHST will always make it as clear as possible what you are opting out of to ensure you can make the most appropriate personal choices.

The Data Protection Coordinator can give you more information about your data protection rights.

RETENTION PERIODS

Except as otherwise permitted or required by applicable law or regulation, FHST only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes. Full details on how long FHST keep personal data for are set out in our Data Protection Policy, which you may request a copy from FHST's registered office.

FURTHER INFORMATION AND GUIDANCE

The Data Protection Coordinator is the person responsible at FHST for managing how FHST looks after personal information and deciding how it is shared.

CONTACT

If you would like to discuss anything within this privacy notice or have a concern about the way FHST collects or uses your personal data, FHST requests that you raise your concern with Geoff Wilmot, the Chief Operating Officer, in the first instance.

FHST have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how FHST handle your personal information which cannot be resolved by Geoff Wilmot, the Chief Operating Officer, then you can contact the DPO on the details below:

Data Protection Officer:	Judicium Consulting Limited
Address:	72 Cannon Street, London, EC4N 6AE
Email:	dataservices@judicium.com
Web:	www.judiciumeducation.co.uk
Lead Contact:	Craig Stilwell

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at [Make a complaint | ICO](#)

CHANGES TO THIS PRIVACY NOTICE

FHST reserves the right to update this privacy notice at any time, and FHST will provide you with a new privacy notice when FHST makes any substantial updates. FHST may also notify you in other ways from time to time about the processing of your personal information.