

Development & Alumni Office Data Protection Statement

1. WHO WE ARE

Trinity School is part of The Whitgift Foundation (the "**Foundation**"), a registered charity (312612) with a commitment to provide education for the young, care for older people and support for carers in Croydon. This data protection statement explains how The Whitgift Foundation, through the Trinity School Development & Alumni Office ("**we**", "**us**" and "**our**"), collects, stores and uses information from which you can be identified such as your name and contact details ("**Personal Information**") in support of alumni engagement, supporter communications and fundraising. It outlines the types of data we process, our legal basis for processing your data, and your rights. We are committed to protecting your Personal Information and being transparent about what data we hold, where it came from and how we use it.

We are committed to safeguarding Personal Information provided to us by any third parties ("**your**" and "**you**") and all visitors to our website www.trinity-school.org (the "**Website**").

We will only use Personal Information which is provided to us, or otherwise obtained by us, as set out in this Statement. We will ensure that your Personal Information is handled in accordance with the "**Data Protection Legislation**" (meaning any law applicable from time to time relating to the processing of Personal Information and/or privacy as the same may be re-enacted, applied, amended, superseded, repealed or consolidated, including without limitation, the UK Data Protection Act 1998, (with effect from 25 May 2018) the General Data Protection Regulation (EU) 2016/679, and the Privacy and Electronic Communications (EC Directive) Regulations 2003, in each case including any legally binding regulations, directions and orders issued from time to time under or in connection with any such law).

By visiting and/or contacting us through our Website or otherwise engaging with us, you acknowledge that we may collect, use and transfer your Personal Information as set out in this Statement.

2. PERSONAL INFORMATION WE COLLECT FROM YOU

The Development & Alumni Office supports Trinity School through our contact with alumni, parents, staff and other friends of Trinity. In order to do this, we store the Personal Information we collect during the course of these relationships on the Foundation's alumni database.

Most of the Personal Information we hold is information that you provide directly to us, for example by:

- completing our 'School Leavers' form;
- completing our online or paper 'Keeping In Touch' forms;
- corresponding with us by email, phone or through social media;
- registering for Development & Alumni events; or
- making a donation or completing a legacy notification form.

Where you provide Personal Information on behalf of another individual, you are responsible for notifying that individual that you have provided their Personal Information to us and directing them to this Statement so they can see how we will process their Personal Information.

3. PERSONAL INFORMATION THAT WE RECEIVE FROM OTHER SOURCES

If you were a pupil at Trinity School, some of your Personal Information will have been transferred from your student record to our database. For example, the dates when you attended Trinity, information about your time at the School, such as the subjects you studied, and information about your higher education.

We may receive Personal Information from third parties concerning you, where this is the case the third party is responsible for informing you that they have shared your Personal Information with us, directing you to this Statement and obtaining any relevant consents from you to ensure you are happy with the ways in which your

Personal Information will be used. For example, we may receive Personal Information about you from the event booking and online donation platforms engaged by Trinity School.

We carry out research using publicly available sources in order to develop a better understanding of our alumni and supporters. This improves your interactions with the Development & Alumni Office as it helps us to send you communications which are relevant and timely, identify volunteering opportunities which may be of interest to you, and identify your potential for supporting Trinity. It also helps us to avoid approaching you with communications or opportunities which are not of interest, or requests for support which are not appropriate. This, in turn, benefits Trinity as it helps to ensure our alumni engagement and fundraising activities are appropriate, efficient and cost-effective. The publicly available sources we may consult includes but is not limited to: LinkedIn, Companies House, Charity Commission, Debrett's, Who's Who, Sunday Times Rich List and The Queen's Honours Lists. From time to time, we may engage third party research specialists to assist us with this research using publicly available sources.

We always aim to keep your details up to date and we will conduct projects to check the contact details we have for you are correct, and, where appropriate, update them. As a result, some of your Personal Information may have been obtained from publicly available sources. For example, we may find a new address for you by using the Royal Mail's National Change of Address database. From time to time, we may engage third party research specialists to assist us with these data cleaning projects using publicly available sources.

The Personal Information we may hold about you as obtained during the course of our relationship with you includes:

- your name, title and date of birth;
- your unique pupil identification number, if applicable;
- your contact details including postal address, email address, phone number and links to social media accounts;
- the dates when you, or your child, attended Trinity School or the dates when you worked at Trinity School
- information about your time at Trinity, such as the subjects you studied or taught, extra-curricular activities, and whether you received a scholarship or bursary;
- information about your higher education;
- details about your family, such as your marital status and the name of your partner or spouse;
- your relationship to other members of the Trinity community;
- your attendance at Trinity events;
- communications sent to you by the Development & Alumni Office or received from you;
- your use of My Trinity, the School's online alumni engagement platform
- volunteering undertaken by you on behalf of Trinity, such as membership of School Committees;
- records of your donations to Trinity and whether you have indicated a legacy gift;
- your communication preferences, to help us provide tailored and relevant communications; and/or
- Personal Information provided by you for a specific purpose (such as disability and dietary preferences for event management purposes).

We also record, based on information you give us, and, in some cases, from research using publicly available sources:

- your occupation, career highlights and other life achievements;
- your areas of interest and recreational activities; and/or
- your philanthropy and other giving, including donations to other organisations and other support that you provide (for example, details of volunteering roles).

4. SENSITIVE PERSONAL INFORMATION

If you provide us with Sensitive Personal Information as defined in the General Data Protection Regulation (EU) 2016/679, the provision of this information is entirely voluntary and subject to your express consent. We will use any Sensitive Personal Information in accordance with the consent you have given and, where necessary, we may also process such information in the establishment, exercise or defence of legal claims.

Where we do receive Sensitive Personal Information, we will only keep such information for as long as strictly necessary in order to comply with our obligations under the law.

5. HOW WE USE YOUR PERSONAL INFORMATION

Your Personal Information is used by us for a number of interdependent purposes in support of alumni engagement, supporter communications and fundraising. These include:

- sending you news and publications (such as alumni magazines and updates about Trinity);
- inviting you to alumni and other events;
- offering you opportunities to volunteer and become involved in the life of the School (such as talks to societies, speaking at Prize Giving and joining a School Committee);
- providing services, including access to My Trinity, the School's online alumni engagement platform;
- sending you tailored proposals, appeals and requests for donations;
- conducting surveys, including research on when and whether particular funding appeals may be of interest to you;
- carrying out wealth analysis in order to help us identify your potential for supporting Trinity (this may be a manual process undertaken by members of the Development & Alumni team or an automated process conducted by a trusted third party);
- internal record keeping, including the management of any feedback or complaints;
- data cleaning and appending to maintain good data hygiene practices; and/or
- administrative purposes (in order to process a donation you have made, for example, or to administer an event you have registered for).

Before seeking or accepting major donations we are required to conduct due diligence, including reviewing publicly available Personal Information relating to the donor's criminal convictions and offences.

Communications to you may be sent by post, telephone or email, depending on the contact details we hold and the preferences expressed by you.

If you have any questions or concerns about any of these purposes, or how we communicate with you, please contact us using the details listed below. We will always respect a request by you to stop processing your Personal Information, and in addition your statutory rights are set out below.

6. OUR LEGAL BASIS FOR PROCESSING

We may process your Personal Information in reliance on one or more of the following legal bases.

Our primary legal basis for processing your Personal Information for the interdependent purposes set out above is that it is necessary for the pursuit of our legitimate interests. We will always handle your Personal Information securely and minimise its use, and there is no overriding prejudice to you by using your Personal Information for these purposes.

We will sometimes process your Personal Information on an alternative legal basis. For example:

- if you purchase a ticket for an event or purchase branded merchandise, our legal basis for processing your Personal Information will be to fulfil our contractual obligation to you;
- if we supply your Personal Information to HMRC in order to claim Gift Aid, our legal basis for processing your Personal Information will be to fulfil our legal obligation.

7. WHO HAS ACCESS TO YOUR PERSONAL INFORMATION AND WHO WE SHARE IT WITH

Trinity School's Development & Alumni staff have access to the Foundation's alumni database, and we maintain other electronic and paper records. Any transmission of data to or from Trinity School is managed through agreed processes that comply with relevant Data Protection Legislation.

Where it is necessary we may share data on a considered and confidential basis, with:

- volunteer partners closely related to us (such as development and advisory board members, alumni societies and alumni group representatives);
- third parties engaged by us, including:
 - contractors who help us with our work (such as a printing company or mailing house);
 - third party agencies who provide services to you on our behalf or services to us (such as event booking or online donation platforms); and/or
 - third party agencies who provide us with data about alumni and supporters (such as research specialists).

We ask all third parties to treat your Personal Information securely and in accordance with this Statement and will take reasonable steps to enforce this.

In addition, it may be necessary to disclose your Personal Information if we are under a duty to disclose your Personal Information in order to comply with any legal obligation, carry out an internal investigation, enforce an agreement, or protect the rights, property, or safety of the Foundation or Trinity School's board members, employees, volunteers or other personnel.

8. HOW WE PROTECT YOUR PERSONAL INFORMATION

We ensure we have appropriate agreements in place before sharing your Personal Information. We will not sell your Personal Information to third parties under any circumstances, or permit third parties to sell on the Personal Information we have shared with them, or use it for any other purposes than those for which they were engaged.

We facilitate communication between individual alumni but in doing so we do not release your personal contact details without your prior consent.

It may sometimes be necessary to transfer your Personal Information overseas (outside of the European Economic Area ("EEA")), for example to an international alumni organisation. We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Statement and the Data Protection Legislation when it is processed in, or otherwise accessed from, a location outside the EEA. This means that we will only transfer your Personal Information to third parties based outside the EEA if that party (a) is situated in a country that has been confirmed by the European Commission to provide adequate protection to Personal Information, (b) has agreed (by way of written contract incorporating the "model clauses" as approved by the European Commission or by some other form of data transfer mechanism approved by the European Commission) to provide all protections to your Personal Information as required by the Data Protection Legislation. For the avoidance of doubt, in the event that the UK is no longer a part of the EEA, references in this paragraph to the EEA shall mean the EEA and the UK.

By submitting your Personal Information to us, you acknowledge this transfer, storing or processing of your Personal Information.

9. HOW LONG WE KEEP PERSONAL INFORMATION

The Development & Alumni Office will keep information about you as long as we have a legitimate or legal reason to do so. We have retention protocols so that we don't keep Personal Information unnecessarily. We will always try to ensure that the information we hold about you is up to date and relevant.

If you were a pupil at Trinity School, we will retain your data indefinitely in support of your lifelong relationship with the School and to maintain your record for archive purposes.

If you exercise your right to erasure (see below for more information on your rights) we will continue to maintain a core set of Personal Information (name, dates you attended Trinity School, unique pupil identification number and date of birth) to ensure we do not contact you inadvertently in future, and to maintain your record for archive purposes. We may also need to retain some financial records about you for statutory purposes (for example, Gift Aid, anti-fraud and accounting matters).

10. YOUR RIGHTS

You have the right to:

- be informed as to how we process your Personal Information (via this Statement)
- access or request a copy of the Personal Information we hold about you (right of access);
- update, amend or rectify the Personal Information we hold about you if it is accurate or incomplete;
- have your personal data deleted where there is no longer a legal ground for us to hold it (right of erasure);
- object to or restrict the processing of your Personal Information in certain circumstances;
- ask for the transfer of your data electronically to a third party (right of portability);
- not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you; and
- make a referral or lodge a complaint with the Information Commissioner's Office (you can do so on their website: <https://ico.org.uk/concerns/>).

We will publish on our Website any changes we make to this Statement and notify you by other communication channels where appropriate.

11. HOW TO CONTACT US

If you have any questions or concerns about this Statement or you wish to ask us not to process your Personal Information for particular purposes, please contact us:

Development & Alumni Office
Trinity School
Shirley Park
Croydon
CR9 7AT
development@trinity.croydon.sch.uk
020 8656 9541

Where you have specific requests relating to how we manage your data, we will endeavour to resolve these, but please note that there may be circumstances where we cannot comply with specific requests.

As Trinity School is part of The Whitgift Foundation, the controller for your Personal Information is The Whitgift Foundation. The Foundation can be contacted on the following details:

Martin Corney
Chief Executive
The Whitgift Foundation
North End
Croydon
CR9 1SS
enquiries@whitgiftfoundation.co.uk
020 8680 8499

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