

Alumni & Development Privacy Notice

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General Information

This privacy notice tells you what to expect us to do with your personal information, that is information about you; your history with Ardingly College and up to date information that you provide such as name and contact details and other information that is created when you interact with us via our website or by attending events.

This data protection statement explains how the Alumni & Development 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. A privacy notice tells you:

- How we obtain your personal information;
- the purposes we process it for;
- how we process it;
- whether you have to provide it to us;
- how long we store it for;
- whether there are other recipients of your personal information;
- whether we intend to transfer it to another country; and
- whether we make automated decisions or use your information for profiling.

Ardingly's Contact Details

Ardingly College is responsible for the personal information we process.

There are many ways you can contact us, including by phone, email and post.

Our postal address:

Ardingly College
College Road
Ardingly
Haywards Heath
West Sussex
RH17 6SQ

Telephone number: +44 (0) 1444 893000

Our Data Protection Contact Details

Our point of contact for data protection related queries is the College Privacy Officer. You can contact them at dataprotection@ardingly.com or via our postal address.

How do we get personal information?

Most of the personal information we process is provided to us directly by you or is created by your interactions at the College, past and present:

- you attend or have attended the College as a student and completed our “School Leavers” form;
- you have made an enquiry of us, completed our online or paper 'Keeping In Touch' form or corresponded with us by email, phone or through social media;
- you have registered for Alumni & Development events;
- you have made a donation or completed a legacy notification form.

We also receive personal information indirectly, in the following scenarios:

- Personal Information may be provided on your behalf by another individual. We ask that if you provide information about a fellow alumni, you notify that individual that you have provided their personal data to us and direct them to this Statement so they can see how we will process their personal data.
- If you were a pupil at Ardingly College, some of your Personal Information will have been transferred from your student record to our database. For example, the dates when you attended Ardingly, information about your time at the College, such as the subjects you studied, and information about your higher education.
- We will receive personal data on event booking and online donation platforms engaged by Ardingly.
- 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 Alumni & Development 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 Ardingly. 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 Ardingly 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, Facebook, 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.
- Other publicly available sources include the Royal Mail which we use to confirm addresses and conduct data cleansing services.

Information we store

- Personal details (such as name, unique pupil number, address, demographic and other contact details, family information, relationships to other members of the Ardingly community)
- Educational History (including prior and previous schools)
- Post-school information
 - your occupation, career highlights and other life achievements;
 - your areas of interest and recreational activities;
 - your philanthropy and other giving, including donations to other organisations and other support that you provide (for example, details of volunteering roles);
- General correspondence and interactions with the Alumni and Development Office;
- Health & Safety information from events (such as records of minor injuries and information that is required to comply with the Health & Safety Executive (HSE) RIDDOR requirements); and
- Static and moving images from events (such as photographs of students and CCTV recordings).

Why we collect and use personal information

We collect and use personal information for engagement, supporter communications and fundraising purposes. These include:

- sending you news and publications (such as alumni magazines and updates about Ardingly);
- inviting you to alumni and other events;
- offering you opportunities to volunteer and become involved in the life of the College (such as speaking at events, volunteering as a mentor, contributing a feature to an alumni magazine and joining a College Committee);
- providing services, including access to the OA shop and merchandise;
- 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 Ardingly (this may be a manual process undertaken by members of the Alumni & Development 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 data relating to the donor's criminal convictions and offences.

Under the Data Protection Act (2018) and the included reference to the GDPR, the College has to specify the lawful bases we rely on for processing student information. These are:

1. Clause (d), Article 6 of the General Data Protection Regulation:

“processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child”. This lawful basis is our grounds for processing data for engagement, supporter communications and fundraising purposes. **It is in the legitimate interests of the college to build relationships with interested parties and build relationships with supporters to help finance and promote its aims and objectives. It is also in the legitimate interests of alumni to network and maintain links with other alumni for personal and career development and social interaction.** We will always handle your personal data securely and minimise its use, and there is no overriding prejudice to you by using your personal data for these purposes.

2. Clause (b), Article 6 of the General Data Protection Regulation:

“processing necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”

This lawful basis is our grounds for processing data if you purchase a ticket for an event or purchase branded merchandise.

3. Clause (c), Article 6 of the General Data Protection Regulation:

“processing necessary for compliance with a legal obligation to which the controller is subject”

This lawful basis is our grounds for processing data if we supply your Personal Information to HMRC in order to claim Gift Aid.

Clause (a), Article 6 of the General Data Protection Regulation;

“the data subject has given consent to the processing of his or her personal data for one or more specific purposes;”

This is the lawful basis of processing for marketing purposes and we will ask you to confirm your consent to marketing and your marketing preferences from time to time. You have the right to withdraw your consent at any time by contacting the College Privacy Officer at dataprotection@ardingly.com.

In addition, concerning any special category data, which is defined by Article 9 of the General Data Protection Regulation as:

“racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation”

The following lawful bases are our grounds for processing special category data.

1. Clause (2) (g), Article 9 of the General Data Protection Regulation:

“(g) processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;”

This is the lawful basis of processing details about criminal activity and criminal convictions which we are required to record as part of our due diligence process under anti Money Laundering regulations.

How we process your personal information

Automated Decision Making:

- The College does not use any automated processes in making decisions about data subjects.

Document Retention:

- The College’s approach to data retention is detailed in our Data Storage and Retention Policy which you can find on our website at <https://www.ardingly.com/> or by asking the College Privacy Officer at dataprotection@ardingly.com.

Data Disposal:

- The College’s approach to data disposal is detailed in our Data Storage and Retention Policy.

Computer Security and User Access Control:

- The College provides details about our security measures in the Information Governance and Compliance Policy and other policies referenced in that document which you can find on our website at <https://www.ardingly.com/> or by asking the College Privacy Officer at dataprotection@ardingly.com.

Guidelines, Training and Expectations of our Staff who work with your Personal Data:

- The College provides details about our security measures in the Information Governance and Compliance Policy and other policies referenced in that document.

Data Breaches:

- The College’s approach to a data breach is detailed in the Data Breach Policy which you can find on our website at <https://www.ardingly.com/> or by asking the College Privacy Officer at dataprotection@ardingly.com.

Data Transfer and Encryption:

- The College's approach to a data transfer is detailed in the Data Sharing Policy which you can find on our website at <https://www.ardingly.com/> or by asking the College Privacy Officer at dataprotection@ardingly.com.

Your Data Protection Rights

Under data protection law we are required to make you aware of your rights. The rights available to you depend on our reason for processing your information.

Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. [You can read more about this right here.](#)

Your right to rectification

You have the right to ask us to correct information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. [You can read more about this right here.](#)

Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances. [You can read more about this right here.](#)

Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances. [You can read more about this right here.](#)

Your right to object to processing

You have the right to object to processing if it causes you or another person damage or distress or if we are using the data for direct marketing purposes. [You can read more about this right here.](#)

Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated. [You can read more about this right here.](#)

You are not required to pay any charge for exercising your rights.

Please contact us at dataprotection@ardingly.com if you wish to exercise a data protection right or contact our helpline on +44 (0) 1444 893000.

Sharing your information

We use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They may share your personal information with another third party organisation but only as specifically agreed with us. They will hold it securely and retain it for the period we instruct.

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).

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 Ardingly College's board members, employees, volunteers or other personnel.

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

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.

We will not share your information with any third parties for the purposes of direct marketing.

International transfers

Some of our service providers are located outside the UK and we rely on mechanisms approved by both the UK and the EU to ensure the security of the data and data protection rights. Some countries have been approved as offering an adequate level of data protection and, where this is not the case, we ensure that the approved Standard Contractual Clauses are in place.

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

- overseas volunteer partners closely related to us (such as development and advisory board members, alumni societies and alumni group representatives).

Alumni are aware that Ardingly College is located in the UK and that personal data is processed in the UK. The transfer of personal information to the UK is made on a voluntary basis by alumni located in other countries which constitutes consent to the transfer.

Links to other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

Complaints

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>