



Clifton College Privacy Notice - Key Information

This notice contains the key information about how and why we collect your personal information and what we do with that information.

In this context 'we', 'Clifton College' or the 'College' shall mean Clifton College and its subsidiary undertakings. Where applicable, it may also include Clifton College Development Trust and/or the College's alumni association (the Old Cliftonian Society).

Personal information is information that identifies you and relates to you. For example, which house you were a member of whilst at the College or whether you are an alumni, governor, parent or former parent. Photographs and videos of you also count as your personal information.

Our primary reason for using your personal information to keep members in touch with each other, in terms of events, reunions, news and activities, and in meeting our charitable aims.

We set out below examples of the different ways in which we use your personal information and where that personal information comes from.

We get information from you, initially when you leave the College and later when you update us of changes to your personal details, such as a change of address.

We also get information from you from publicly available sources, such as social media.

We may use photographs or videos of you for the OC Society's website and social media sites.

We will send you information to keep you up to date with what is happening at the College. For example, by sending you information about events and activities taking place (including fundraising events) and the College newsletter.

Where relevant, for example during a joint OC Society and College event, we may share your personal information with other members of the Clifton College family, which includes Clifton College, Clifton College Services Limited, Clifton College International Limited and all present or future subsidiaries, Clifton College Development Trust, Old Cliftonian Society, Clifton College Endowment Fund. All members of the Clifton College family are located in the United Kingdom.

We may also share your personal information with third parties. For example, we may share information with external facilities and event providers. On occasion, we may need to share information with the police, our legal advisors and our insurers.

As a fundraising organisation, we undertake in-house research and from time to time engage specialist agencies to gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives.

You have the following rights regarding your information:

Rectification of information held

Access to information held

Deletion of information in certain circumstances

Portability - the transfer of information to you or a third party

Restriction of use of information; and

The right to object to the use of information in certain circumstances.

The Director of Corporate Services is the person responsible at our College for managing how we look after personal information. The Director of Corporate Services is supported by the Data Protection Adviser ('DPA'). The Director of Corporate Services or the DPA can answer any questions which you may have about how we use your personal information. This can be requested by contacting the College's Data Protection Adviser (dpa@clifoncollege.com).



THE OLD CLIFTONIAN SOCIETY

CLIFTON COLLEGE

Old Cliftonian Society Privacy Notice

Introduction

This notice is to help you understand **how** and **why** we collect your personal information and **what** we do with that information. It also explains the decisions that you can make about your own information.

What is "personal information"?

Personal information is information that the OC Society holds about you and which identifies you.

This includes information such as your name, date of birth, dates when you attended the College, contact details as well as things like exam results and any particular achievements. It may also include where you attended university, your occupation, records of any donations you may have made (and your Gift Aid status, where applicable), and any involvement you may have with the OC Society, such as attendance at events or mentoring of current College pupils. We will also hold information such as any special dietary requirements to enable us to provide appropriate catering at OC Society events. Photos and video recordings of you are also personal information.

Our legal bases for using your information

This section contains information about the legal bases that we are relying on when handling your information.

The two tables below contain a general description of the different legal bases but we have also used a colour code system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 18 below.

Legitimate interests ("L")

This means that the OC Society is using your information when this is necessary for the OC Society's legitimate interests or someone else's legitimate interests. We won't rely on this basis when your interests and fundamental rights override our legitimate interests. Specifically, the OC Society has a legitimate interest in:

Promoting the College and the OC Society by providing you with information about events and the latest news from the College.

Looking after you, your fellow OCs and our staff during OC Society events.

Promoting the objects and interests of the OC Society. This includes fundraising, donor profiling and using photographs of you at our OC Society events in promotional material. It also includes making sure that we are able to enforce our rights against you, for example, so that we can contact you if unpaid event fees are due.

Keeping the College buildings safe.

Making sure that the OC Society is well managed and that we protect the College's reputation.

Telling people about the OC Society and what we do e.g. we may use photographs of you on our website or in our social media.

Ensuring that all relevant legal obligations of the OC Society are complied with.

Using your information in connection with legal disputes.

Improving and supporting the College e.g. if we want to raise money to build new buildings or to make sure that we are providing current pupils with a good schooling experience, which includes the provision of bursaries.

In addition your personal information may be processed for the legitimate interests of others. For example, we may use information about you when investigating a complaint made by one of your fellow OCs.

Legal obligation ("LO")

The OC Society might need to use your information in order to comply with a legal obligation. For example for health and safety reasons if you attend an event we may need to contact the Health and Safety Executive.

Necessary for contract ("CT")

We will need to use your information in order to perform our obligations under our contract with you. For example, we need your name and contact details to provide you with information about OC Society events you are attending.

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

This applies where what we are doing is for the benefit of people generally. The following are examples of where this applies:

facilitating the efficient operation of the OC Society; and

ensuring that we comply with all of our legal obligations.

The OC Society must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sexual orientation.

Substantial public interest ("SPI")

The OC Society is allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above. For example, the OC Society will use information about your health to look after you during Society events.

Legal claims ("LC")

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers. This applies whenever sharing special category data is necessary in relation to legal claims.

Medical purposes ("MP")

This includes medical treatment and the management of healthcare services.

How and why does the OC Society collect and use your personal information?

We set out below different ways in which we use personal information and where this personal information comes from. The letters highlighted in different colours below refer to the legal bases we are relying on. Please see the section above for an explanation.

Core Purposes

The OC Society's primary reason for using your personal information is to keep members in touch with each other, in terms of events, reunions, news and activities and for raising funds in support of our charitable aims - **LI**.

We will also use your personal information to safeguard and promote your welfare and the welfare of others (for example, so that we can look after you if you are hurt during an OC Society event) - **LI, PI, SPI, MP**.

We record your attendance at events - **LI**.

We facilitate interaction between members of the OC Society by providing an online portal to allow OCs to communicate. OCs are able to search for and email fellow Society members within a five year range of their own year group. Messages are sent without revealing the recipient's email address, but do show the sender's email address. - **LI**.

We may contact you regarding opportunities to support the OC Society and the College, for example, by providing mentoring or work experience placements. - **LI**.

We may alert you to current fundraising initiatives where these are intended to benefit the OC Society or the College as a whole, e.g. if we want to raise money to build new buildings - **LI**.

If you wish to make a donation, particularly a donation of a substantial value, we may need to verify your identity and/or carry out financial due diligence on you. This may involve taking and retaining copies of your identification documents and obtaining your personal information from various sources including, for example: internet search engines, 192.com, the Charity Commission, Zoopla, Business Week and related media articles - **LI, LO**.

We get information from you, initially when you leave the College and later when you update us of changes to your personal details, such as a change of address. We also get information from you from publicly available sources.

Ancillary Purposes

We need to tell the appropriate event organisers if you are allergic to something or have a health issue - **LI, CT, PI, SPI**.

If we have information that you suffer from a disability we will use information about that disability to provide support during any events - **LI, CT, PI, SPI**.

Where appropriate, we hold information about your religious beliefs and practices. For example, if you do not eat certain foods - **LI, CT, PI, SPI**.

We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue during an event - **LI, LO, PI, SPI**.

If someone makes a complaint about how the OC Society has acted we may need to use your information to deal with this appropriately - **LI**.

We use consultants, experts and other advisors to assist the OC Society in fulfilling its obligations and to help run the Society properly. We will share your information with them if this is relevant to their work. We may also carry out analysis to fast track the research using our trusted third party partners. You will always have the right to opt out of this processing. We may also carry out research using publicly available information to identify individuals who may have an affinity to our cause but with whom we are not already in touch. This may include people connected to our current major supporters, trustees or other lead volunteers. We also use publicly available sources to carry out due diligence on donors in line with the charity's Gift Acceptance Policy and to meet money laundering regulations. This research helps us to understand more about you as an individual so we can focus conversations we have with you about fundraising and volunteering in the most effective way, and ensure that we provide you with an experience as a donor or potential donor which is appropriate for you. - **LI**.

We may share some information with our insurance company to make sure that we have the insurance cover that we need - **LI, PI, SPI, LC**.

We may use photographs or videos of you for the College and OC Society's websites and social media sites. - **LI**.

We may share your personal information with other members of the Clifton College family, which, aside from the College itself, includes Clifton College Services Limited, Clifton College International, Clifton College Development Trust and Clifton College Endowment Fund. For example, we may share your information with the College when we are hosting an event on the College site, or with the Clifton College Development Trust if you make a donation to the OC Society.- **LI**.

The OC Society must make sure that our computer network is working well and is secure. This may involve information about you, for example, our anti-virus software might scan files containing information about you - **LI**.

We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the College - **LI**.

We will only share your information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.

We sometimes use contractors to handle personal information on our behalf. The following are examples:

IT consultants who might access information about you when checking the security of our IT network]; and

we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the College site.

If you have any questions about any of the above, please speak to the OC Society Secretary.

Criminal offence information

We may only use information relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations or to exercise our rights.

Less commonly, we may use information relating to criminal convictions and offences where it is necessary in relation to legal claims, where it is necessary to protect our pupils and you are not capable of giving your consent, or where you have already made the information public.

More than one basis

As you will see from the information above, in some cases we will rely on more than one basis for a particular use of your information. In addition, we may move from one of the legal bases listed above to another as circumstances change.

Consent

We will contact you with marketing material by email, telephone, post or by text message but we will only do this where we are allowed to do so under data protection law (for example, we will usually need your consent before sending you an email about a fundraising opportunity).

We may also ask for your consent to use your information in certain ways as an alternative to relying on any of the bases in the table above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for your consent to use your personal information you can take back this consent at any time.

If you tell us that you do not want to be contacted for any of these purposes then we will of course respect that. Any use of your information before you withdraw your consent remains valid. Please speak to the Alumni Events and Communications Manager on lnash@cliftoncollege.com if you would like to withdraw any consent that you have given.

Sending information to other countries

We comply with the UK GDPR. In certain circumstances, we will send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may:

store your information on cloud computer storage based overseas; or

We may carry your contact details when undertaking an overseas school trip on which your child is participating.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

If the country that we wish to send your information to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), it might not have the same level of protection as in the UK. We will conduct a risk assessment to determine whether there will be an adequate level of protection in place before we transfer the information. If you have any questions about the safeguards that are in place please contact the Data Protection Adviser.

For how long do we keep your information?

We keep your personal data in an identifiable form for as long as we have a legitimate reason to use the data and as required by law. Please contact us for more information on how to ask us to delete your data.

What decisions can you make about your information?

Since May 2018 you are able to make various decisions about your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

Rectification: if information the OC Society holds about you is incorrect you can ask us to correct it.

Access: you can also ask what information 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 information about you, where it came from and what types of people we have sent it to.

Deletion: you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.

Portability: you can request the transfer of your information to you or to a third party in a format that can be read by computer in certain circumstances.

Restriction: our use of information about you may be restricted to simply storing it in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

Object: you may object to us using your information where:

we are using it for direct marketing purposes;

the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our legal bases for using your information" above;

we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons.

Further information and guidance

The Data Protection Adviser ('DPA') is the person responsible for managing how we look after personal information and deciding how it is shared.

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

This notice is to explain how we use your personal information. This privacy notice does not, and is not intended to, give you any rights which you did not already have. For example, it does not give you any additional contractual rights.

Contact The Alumni Events and Communications officer on lnash@cliftoncollege.com if:

you object to us using your information for marketing purposes e.g. to send you information about OC or College events. We will stop using your information for marketing purposes if you tell us not to; or

you would like us to update the information we hold about you; or

you would prefer that certain information is kept confidential.

If you fail to provide certain information when requested, we may not be able to perform our obligations under the contract we have entered into with you. We may also be prevented from complying with our legal obligations.

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office - ico.org.uk.