



## Repton Foundation/Repton School Trust and OR Society/Reptonian Society Privacy Notice

### INTRODUCTION

Repton School is committed to protecting your privacy and security. This Notice is intended to provide information about how the Development Office within the School will use (or process) your data.

This Notice applies to supporters of the charitable arms of the School, including the Repton Foundation and the Repton School Trust, and parties whose details the School could hold in relation to other School communications, including the arrangement of co-curricular activities.

For the purposes of the document, these supporters include alumni of Repton School, parents of current and former pupils, current and former staff and other Friends of Repton. For individuals who have a further affiliation with the School, other Privacy Notices will also apply; these are available on the School website.

As part of its operations, the School collects and processes personal data and thus is a data controller for the purposes of legislation relevant to the Data Protection Act 2018, UK General Data Protection Regulation and other relevant Data Protection Legislation.

The School will never sell your data. We will always respect your wishes regarding how you would like to be contacted.

This information is provided in accordance with your rights under Data Protection Law to understand how we use your data. Supporters of Repton School are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

### YOUR RIGHTS

Under data protection legislation, you have various rights to access and understand the personal data we hold about you, and in some cases to ask for it to be erased or amended. In some cases we may be legally required to retain some of your core data, for example, to keep a record of your contact preferences or records of donations, and the years which you attended or worked at the School.

You have the right to:

- Be informed about the collection and use of your personal data
- Rectify incorrect or incomplete personal information we hold on you
- Erasure, or be forgotten, by asking us to remove your personal data
- Make a Subject Access Request (SAR) for the personal data we hold on you
- Withdraw your consent, or change or restrict your processing and communication preferences at any time by using the contact details above
- Receive personal data you have provided in a structured, commonly used and machine-readable format, or request we transmit it directly to another controller
- Object to certain purposes and bases for processing your personal data

Note that we may not always be able to comply with your request (e.g. if we are legally required to store the data, we would not be able to comply with a request for erasure), but we will always reply to your request. To exercise any of these rights, please contact [dataprotection@repton.org.uk](mailto:dataprotection@repton.org.uk). If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance by contacting [dataprotection@repton.org.uk](mailto:dataprotection@repton.org.uk). Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>. For further information on your rights, please refer to guidance from the Information Commissioner's Office.

## **WHY WE COLLECT DATA**

Repton School was established in 1557, with the aim of allowing deserving young people to benefit from a Repton School education regardless of parental ability to pay the fees. This continues today, with charitable donations supporting transformational bursaries for pupils and the preservation of the School's historic site, as well as the building of new facilities to provide the best of opportunities for our pupils, in line with the School's values and ethos. In addition to this mission, we aim to support our alumni network of Old Reptonians, parents, staff and Friends of Repton, offering a range of social and networking events, and a regular programme of communications.

We use our legitimate interest as the lawful basis for storing and processing the majority of your personal information. This allows us to carry out our charitable endeavours. In some instances, it is our legal obligation to hold certain tax information. For example, this is our lawful basis for storing your Gift Aid declarations.

## **WHAT INFORMATION WE PROCESS**

The Development Office holds a database of information on Repton School supporters in a database separate from the School Administration Management System. The database is securely hosted by the provider which maintains reasonable administrative, technical and physical safeguards to protect personal data from loss, misuse and unauthorised access, disclosure, alteration and destruction.

Following the end of the retention periods for personal data processed under Repton School Pupils and Parents Privacy Notice and Workforce Privacy Notice, certain documents containing personal data (such as images of alumni) are retained in perpetuity.

The data we process may include:

- Personal information (such as name, address, email address, telephone number, gender, date of birth)
- Industry sector and job function
- Record of postal, telephone or email communications sent to and received from you
- Record of donations and Gift Aid declarations
- Current interests, School interests, House (while at School) and record of grades
- Mailing and communication preferences
- Event attendance information
- Images and video recordings (whilst at School and from OR events)
- CCTV images and recordings from public areas of the School site
- Media and/or publicly available articles about you
- Affinity to the School, wealth screening publicly available data and inclination to support the School
- Bank or credit/debit card details for event ticket bookings and donations when provided directly to the School

## **HOW WE USE YOUR DATA**

Your data may be used for a number of alumni relations and fundraising activities, including sending you publications, inviting you to events, providing services such as networking opportunities, requests for involvement in careers events, conducting surveys and other alumni coordination.

We carry out targeted research activity to better understand our supporters and to help inform our fundraising strategy. In addition to the information you directly provide us with, we may supplement what we know about you with information from publicly available sources to help shape our activity and ensure any requests for additional support are tailored to you. This data also helps us to avoid sending irrelevant or inappropriate communication to you and allows us to prioritise our resources and operate as cost effectively as possible.

Publicly available sources where we collect data may include sites such as social media channels, information society services, and Government websites and registries. We will only record relevant data.

Prospect research carried out may include wealth screening via a third party in order to inform the School's fundraising efforts. Individuals have the right to object to this processing at any time. We occasionally outsource our postal communications, for example the annual magazine, to a mailing house for printing and distribution. This is done with appropriate and secure agreements in place.

## **WHEN WE WILL SHARE YOUR DATA**

Personal data collected by the Repton Foundation/School Trust and OR/Reptonian Society will remain with the School and it will be processed by appropriate members of staff for the purposes for which the data was provided. We take appropriate technical and operational steps to ensure the security of personal data, including policies concerning use of technology and devices, and access to school systems.

We share information with:

- Our database provider
- HMRC (Gift Aid claims)
- Stripe (third-party card processor)
- Mailing houses (postal campaigns)
- Banks and banking services such as Charities Aid Foundation
- Image sharing websites/social media (event photographs)

## **DATA RETENTION**

We are expected to hold a certain level of relevant data on parents, alumni or supporters of the School, such as your name and the years which you attended as a pupil. If you exercise your right to erase yourself from our database, we will still retain this core data indefinitely in order to maintain our archives and avoid inadvertently contacting you. We will process bank details and credit/debit card information through our payment processor or pass the originals on to the relevant bank if applicable. Original forms are not retained and are confidentially disposed of.

Unless a request to remove data is received, information outside of this core area held on our database will be reviewed at 10-year intervals, at which time the Foundation will review whether it is necessary to our function.

## **ARCHIVES**

Repton School dates back to 1557AD, and our archives are extremely important in providing evidence of activities and telling a story of the institution and the individuals who are connected with it. The archives also increase our understanding of culture and beliefs of the time, both in education and in the village of Repton.

## **Version Control**

Version #	Date	Updated by	Description
1_1	07/06/2024	M Davies	J Wolfe amends
1_0	23/05/24	M Davies	First Draft