



## Privacy Notice

### For fundraising, development and alumnae activities

This statement explains how the Development and Alumnae Relations (DAR) department within the School (“we” and “our”) handles and uses the personal data we collect about our alumnae, parents (of both current and former pupils), current and former staff and our past, current and future supporters (“you” and “your”). This includes donors, volunteers, participants in membership groups that we run, or attendees at events that we organise. Developing a better understanding of our alumnae and supporters allows us to keep in touch with you, in order to keep you apprised of our activities and developments, to provide services to you, and to identify ways in which you can support us, through donations or other forms of financial and non-financial support.

We are committed to protecting your personal information and being transparent about what information we hold. The following statement sets out how we specifically use your personal data for fundraising and alumnae relations purposes. Please see our separate privacy notice for details about other processing of personal data by the School.

### Personal data that we hold

The DAR department has a separate database which holds information about pupils, alumnae, parents, staff, donors and other supporters. We may hold information relating to you which is collected from a number of sources. A significant proportion of the information we hold is that which you provide to us (for example, you may give us information by filling in forms via JAGSPost, by signing up to the JAGS Alumnae Association website, participating in events and philanthropic activities or by corresponding with us by telephone, email or otherwise). In addition, we obtain information about you (including personal data) from admissions and registry where it is relevant to our work. If you were a pupil at JAGS, some of your personal data is transferred from your pupil record on ISAMS to the School’s alumnae database.

Most records contain:

- ❖ Details of education (including higher education)
- ❖ Unique personal identifiers and biographical information including family member details
- ❖ Name
- ❖ Date of birth
- ❖ Job Title
- ❖ Employer/Place of Work/Specialism
- ❖ Contact details (personal and/or business as appropriate)
- ❖ Details of your interactions with the School (philanthropy and volunteering, including donations made to the school and gift aid status)
- ❖ Attendance at School and alumnae events

- ❖ Personal data provided by you for a specific purpose (eg disability or dietary preferences for event management purposes)
- ❖ Your communication preferences
- ❖ Your relationships with other alumnae or supporters of the school
- ❖ Historical data of past alumnae held in the archive

We augment the data we hold from the School with publicly available data, which may include information on financial assets. Financial asset data is limited to what is publicly available, proportionate, and reviewed ethically.

We use targeted internet searches and may search the following websites (either directly or using search engines), where relevant in order to obtain and maintain the accuracy of the data listed above:

- ❖ Public sources for companies (ie Companies House, Company websites, Capital IQ)
- ❖ Public sources for charities
- ❖ Public sources for individuals (ie Who's Who, The Queen's Honours List, LinkedIn, Rich Lists)
- ❖ Press sources

## How we use your data

Your data is used by us for a number of purposes in support of alumnae relations, supporter communications and fundraising. These include:

- ❖ sending you publications (e.g. alumnae magazines and updates about the School)
- ❖ conducting surveys, including research on when and whether particular donations or fundraising appeals may be of interest to you
- ❖ providing services, including access to School facilities and the JAGS Alumnae Association website (for example <https://alumnae.jags.org.uk/homepage>)
- ❖ sending you tailored proposals, appeals and requests for donations
- ❖ sending you details of volunteering opportunities
- ❖ activities within the careers and higher education program at JAGS including: -
- ❖ Sharing your contact details with Sixth Form pupils seeking a work experience placement or insight visit to a workplace.
- ❖ Involving you in a careers event at JAGS e.g. to give a careers talk or host a stand at a careers fair.
- ❖ Inviting you to take part in the Sixth Form practice interview programme during the application process for university or prior to applying for school leaver, higher/degree apprenticeship or gap year schemes

- ❖ Inviting you to alumnae and other School events
- ❖ the promotion of other opportunities and services available to you (e.g. offers and opportunities available through the School's network of Alumnae Groups)
- ❖ research in order to improve our understanding of our alumnae and supporters, inform our fundraising strategy and target our communications more effectively
- ❖ internal record keeping, including the management of any feedback or complaints
- ❖ administrative purposes (e.g. in order to process a donation you have made or to administer an event you have registered for or attended)
- ❖ keeping a record of our alumnae for historical or research purposes

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.

We may contact you by post, phone or email, depending on the details you have provided and your stated preferences. Communications are managed in line with the Privacy and Electronic Communications Regulations (PECR), which means we only send marketing where you have consented or the law permits, and you can opt out at any time. Unsubscribe details are included in our emails, or you can contact us directly with any queries.

We may use automated or manual analyses to link data together to help us identify your potential for supporting the School, to provide you with an improved experience, to send you communications which are relevant and timely, to identify volunteering opportunities or opportunities for providing support which may be of interest to you, and to avoid approaching you with opportunities which are not of interest. All of this enables us to raise more funds, sooner, and more cost-effectively, in support of the School Strategic Development Plan. We always seek to ensure that any opportunities we present are aligned with your interests, based on the research we conduct.

We may use limited automated analysis to link data for fundraising insight, but we do not use artificial intelligence (AI) or automated decision-making to make decisions that have legal or significant effects on you.

We will always respect a request by you to stop processing your personal data (other than where we are obliged by law to process it), and in addition your statutory rights are set out below.

### **When we share your data with others (our partners)**

Occasionally, the School will need to share personal information relating to its community with third parties, such as:

- ❖ professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- ❖ a mailing house or data-cleansing provider
- ❖ government authorities (such as HMRC);

- ❖ the Information Commissioner's Office

All third parties engaged to process personal data on our behalf are bound by contractual obligations to keep your data secure and act only on our instructions.

## How we protect your data

The School uses technical and organisational measures such as encryption, access controls, and multi-factor authentication to protect your personal data.

We ensure we have appropriate data sharing agreements in place before sharing your personal data.

We do not sell your personal data to third parties under any circumstances.

We also facilitate communication between individual alumnae, but in doing so we do not release personal contact details without prior permission.

Any transfers of your data overseas (outside of the UK or the European Economic Area (the "EEA")), for example IT systems hosted outside the UK or the EEA, are protected either by an 'adequacy decision' by the European Commission or adequacy regulations approved in the UK (declaring the recipient country as a 'safe' territory for personal data) or by standard contractual clauses adopted by the European Commission or the UK government (which give obligations for the recipient to safeguard the data). Further information about the measures we use to protect data when being transferred internationally is available from our Privacy & Compliance Officer (whose contact details are set out below).

## Your rights

You have the right to:

- ❖ ask us for access to, or rectification or erasure of your data
- ❖ restrict processing (pending correction or deletion)
- ❖ object to communications or direct marketing
- ❖ ask for the transfer of your data electronically to a third party (data portability) Many of these rights are qualified in various ways.

You have the right to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## Further information

The legal basis for processing your personal data for the purposes set out above is that it is necessary for the pursuit of our legitimate interests. In some cases, such as data relating to disability or dietary preferences for event management purposes, we are processing your personal data because you have given us your consent to do so. We always handle your personal data securely and minimise its use, and there is no overriding prejudice to you by using your personal information for these

purposes. In addition, there is no statutory or contractual requirement for you to provide us with any personal data.

The controller for your personal data is the Data Protection Lead and can be contacted at [justine.addison@jags.org.uk](mailto:justine.addison@jags.org.uk). Our Data Protection lead is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data.

Please contact the Privacy & Compliance Officer if you have any concerns or questions about the above information or you wish to ask us not to process your personal data for particular purposes. 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.

We will retain a core alumnae record indefinitely in support of your lifelong relationship with the School, unless you request otherwise. All retention periods are guided by the School's Records Retention Schedule, which reflects legal, regulatory and sector-specific requirements, and records are regularly reviewed to ensure they remain accurate, relevant and not excessive.

Where you exercise your right to erasure, we will continue to maintain a core set of personal data (name, subject(s), matriculation and graduation details, unique School identification number and date of birth) to ensure we do not contact you inadvertently in future, and to maintain your academic record for archive purposes. We may also need to retain some financial records about you for statutory purposes (e.g. Gift Aid, anti-fraud and accounting matters).