

Privacy Notice – Old Bradfordians and Friends



Bradford
Grammar
School

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data. For the purposes of this Privacy Notice, Bradford Grammar School is the data controller.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person. For the purposes of this Privacy Notice the Data Subjects are Old Bradfordians (Alumni), parents and past parents, former staff, and benefactors to school.

Special categories personal data - The General Data Protection Regulation (“GDPR”) refers to sensitive personal data as ‘special categories of personal data’ (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

Bradford Grammar School is an outstanding UK independent grammar school, which believes in providing every opportunity for its Junior and Senior pupils. We embrace academic, sporting and creative excellence within an aspirational, caring environment, which builds on our heritage while looking to the future. We nurture exciting and fulfilling lives shaped by our School’s traditional values and believe happiness is the key to an individual’s success. We are at ease with excellence.

Our Charity registration number is 529113, and we are registered at Bradford Grammar School, Keighley Road, Bradford, BD9 4JP.

Maintaining a relationship with our Old Bradfordians and other friends and supporters is tremendously important to us, as is your privacy and confidentiality. We are committed to protecting and respecting your privacy. This statement explains when and why we collect personal information, how we use it, the conditions under which we may process it and how we keep it secure.

3. What is Personal Data?

Personal data is information which relates to an individual and from which he or she can be identified either directly or indirectly through other data which the School has or is likely to have in its possession. These individuals are sometimes referred to as data subjects. Personal data does not include information about companies and organisations.

4. What do we hold?

We collect, hold and share such information as:

- personal contact details (email, home address and phone numbers),
- Family and spouse/partner details and relationships to other alumni, supporters and friends,
- years spent at BGS including subjects studied,
- recreations and interests,
- media articles,
- clubs and hobbies,

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- subsequent university and career information,
- interactions with the school including events and meetings attended and communications received,
- records of donations made to school and Gift Aid status (as required by HMRC)

We may use information from publicly available sources (for example, LinkedIn, Twitter, Companies House, the Electoral Register, and corporate websites) to better understand the needs and preferences of our community, and to assess the inclination and capacity of individuals to support the school (financially or by volunteering their time). We also use publicly available sources to carry out due diligence on donors in order to meet money laundering regulations.

Furthermore we may carry out wealth screening, a process which uses trusted third-party partners to automate some of this work. This enables us to hold focussed conversations about fundraising and volunteering in the most effective way, and to ensure that we provide all Old Bradfordians with an appropriate experience. We are committed to working in a transparent, ethical, responsible and honest way. We will always advise those individuals that such work has been conducted and only retain associated information with their permission and in line with our legitimate interest. Where fundraising approaches are made, the school will ensure that the consent of the relevant individual is recorded, either in the form of a dated document, online record and timestamp, or in the case of oral consent, a note of the time and date which was made at the time of the conversation. We will also record any instance of the individual withdrawing consent. To reflect this commitment, we are a member of the Fundraising Regulator and committed to the Regulator's Code of Practice.

5. Collecting Handling and Sharing Personal Data

Our Development & Old Bradfordians' Office may use personal information you have given to the School and that which is in the public domain to keep in touch and to notify you of School events and activities you might find of interest.

At BGS, we aim to develop a body of connected individuals to help each other and to support the School.

Collecting and storing your information is part of that work, which will ultimately benefit pupils. We collect your information to:

- ensure that we keep you up-to-date with BGS news and events that are relevant to you
- gain a broad understanding of your circumstances and interests so we can develop and offer
- the best possible personalised service
- make sure our information is accurate
- keep you updated about opportunities to support BGS pupils and the School
- help us to plan our communications and events, use resources wisely and assure the high
- quality of our work.
- for fundraising purposes
- for track and trace purposes

Personal information will never be passed on to others without your express permission, except when required by law. However, unless you tell us otherwise your Data may be made available to third parties to the extent necessary for any of the purposes set out above. These third parties include school staff and departments, recognised Old Bradfordian clubs and societies, and agents contracted to provide administration services (such as the printing and distribution of any correspondence documents). Where we commission external agents to process your data for administrative services, we commit to ensuring all due diligence has been conducted, including entering into legally binding data sharing agreements which clearly define the terms of how your data is used and for how long. If your details change, or you wish to opt out of communications from us please contact oldbradfordians@bradfordgrammar.com.

6. Purposes for which we use Personal Data

We process personal data to support the school's operation as a co-educational, independent school, and in particular for and in particular for promoting fellowship amongst Old Bradfordians and to fundraise for the advancement of education at BGS.

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We may process special categories of personal information where it is needed in the public interest and/or for safeguarding purposes, or where there is a legitimate or legal requirement such as for track and trace purposes.

7. What is the lawful basis on which we will use this information?

We also use your data for the following purposes:

- to perform/administer any contract that we have entered into with you
- where the processing is necessary for the purposes of our legitimate interests or those of a third party, except where such interests are overridden by your interests or fundamental rights or freedoms
- where relevant and required, we may process your information as a legitimate and legal requirement within the Government's track and trace process.

In order to comply with the GDPR, we will inform you whether you are required to provide certain personal data to us or if you have a choice in this.

- We collect information when you leave school and join BGS-Alumni or update your details, e.g. via our website
- We receive such via email, over the phone and through the post or directly from alumni
- We may include information on your record from additional publicly accessible sources.
- When you purchase event tickets through Eventbrite
- We will store any information in accordance with our Data Protection and Data Retention policies.

8. Your Rights

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information contact our Data Protection Manager who is Mrs Homera Najib, Acting Bursar and Clerk to the Governors via dataprotection@bradfordgrammar.com or by post to the address listed in point 1. If any of the information we hold is incomplete or inaccurate, please tell us by contacting us at dataprotection@bradfordgrammar.com and we will correct it. We will endeavour to provide you with requested information within one month. If we do refuse a request, we will advise you accordingly within one month.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- withdraw your consent to the processing (where we are processing your personal data on the grounds of your consent)
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;
- and
- claim compensation for damages caused by a breach of data protection legislation

If you have a concern about the way we respond to your request or wish to complain about this or how we are collecting or using your personal data, we request that you raise your concern with us in the first instance at dataprotection@bradfordgrammar.com or, without prejudice, you have the right to lodge a complaint direct to the Information Commissioner's Office if you have any concerns in relation to our information rights practices via <https://ico.org.uk/concerns/>.

9. Use and Storage of your information Overseas.

Your information may be transferred to, stored and processed outside the European Economic Area (EEA). We will not transfer your information outside the EEA unless it is to a country which is considered to have equivalent data protection laws or where we have taken all reasonable steps to ensure the recipient of your personal data has suitable standards in place to protect your information. Both Graduway (Headhunter Systems Ltd – the software provider used by the School for alumni networking and management software to manage Alumni Data.) and Raiser's Edge (Blackbaud Inc -the cloud-based fundraising and relationship management software) confirm that any transfer of personal data of EEA data subjects outside of the EEA, will be undertaken using a method specifically permitted under UK and

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European Union law. Please refer to their statements that can be found at <https://bgs-alumni.com/privacypolicy>: and <https://www.blackbaud.com/privacyshield>: respectively for further information.

10. Changes to our Privacy Policy

We may change this Policy from time to time. Any changes made to the policy will be clearly detailed within this section. This Policy was last updated in March 2019.

11. Website Third Party Links

Our website may contain links to other websites run by other organisations. This Privacy Policy applies only to our website, so we encourage you to read the privacy statements on any other websites you visit.

We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website. We do not endorse the content of any external sites and we are not responsible or liable, directly or indirectly, for any loss however caused to you by your use of any external site.

12. Miscellaneous

The information on this website is for residents of the UK only. These Terms shall be governed by and construed in accordance with English law and the English courts shall have jurisdiction over any disputes between us.

13. Contact Us

Any questions regarding this Policy and our privacy practices should be sent via oldbradfordians@bradfordgrammar.com or in writing to the Development & Old Bradfordians' Office, Bradford Grammar School, Keighley Road, Bradford, BD9 4JP.

Reviewed by Lupton Fawcett 23 May 2018
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