



# FOUNDATION OFFICE PRIVACY POLICY

PERSON(S) RESPONSIBLE: Director of Development,  
Latymer Foundation at Hammersmith

DATE OF LAST REVIEW: March 2018

DATE OF NEXT REVIEW: March 2019

REVIEWED & APPROVED: AUDIT & RISK COMMITTEE OF GOVERNING BODY  
DATE OF APPROVAL: [April] 2018

## **1. WHO WE ARE**

Latymer Upper School and Latymer Prep School (referred to in this policy as “the School”) is part of the Latymer Foundation which is a registered charity and our registered charity number is 312714. We take our responsibilities as a data controller seriously and are committed to using the personal data we hold in accordance with the law.

## **2. WHO THIS PRIVACY NOTICE APPLIES TO**

The School’s Privacy Notice is available on the School’s websites for [LUS](#) and [LPS](#) and applies to staff, parents, pupils (including former pupils) and any other person whose personal data we may process. It should be read in conjunction with this Notice, the purpose of which is to explain in more detail how the Foundation Office stores, manages and protects your personal information. The Foundation Office is part of the School, which means that the School is ultimately responsible for how the Foundation Office uses your information.

If you have any questions about this Privacy Notice or on how we use your personal data please contact the Privacy and Compliance Officer at the School (see contact details below).

## **3. RESPONSIBILITY FOR DATA MANAGEMENT**

The School’s Compliance Officer has been given responsibility for data management and will deal with all your requests and enquiries concerning the School’s uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. The Compliance Officer’s contact details are:

[elp@latymer-upper.org](mailto:elp@latymer-upper.org) 020 8629 2024 Latymer Upper School King Street, London W6 9LR

## **4. WHY WE PROCESS PERSONAL DATA ABOUT YOU**

In order to carry out our ordinary duties, the School needs to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of our daily operation. The legal basis for this is outlined in the School Privacy Notice.

The Foundation Office supports the School through the creation of meaningful relationships with alumni, pupils, parents (both current and former) and supporters of the School.

We do this by offering a range of educational, social and networking events, producing publications, and through our network providing careers advice for current and former pupils. We also fundraise to support the School’s bursary programme, capital projects and other initiatives in accordance with the Fundraising Promise and the Fundraising Code of Practice. We are very proud of the relationships we have with our alumni, supporters and friends of the School, and we use your personal information to ensure we contact you in the most appropriate way, to improve our offering and to ensure we work efficiently and effectively.

In many cases, we are processing your personal information because you have asked us to keep in touch about our activities. Sometimes we also ask you for specific consent, for example to check that you want to receive information from us by email.

We also expect that use of your personal data is in accordance with the School's legitimate interests.

We expect the following uses will fall within that category of our "**legitimate interests**":

- promoting the charitable objects and interests of the School, including fundraising for our bursary programme and any other initiatives that benefit the school community;
- holding alumni social and networking events;
- keeping the School community (past and present) up to date about our activities including sending you our publications electronically and by post;
- fostering life-long relationships with our alumni community to support our development and objectives;
- keeping a record of our alumni for historical or research purposes;
- ensuring that we comply with any statutory obligations including: safeguarding and promoting the welfare of our pupils with whom you may come into contact;
- ensuring we meet our obligations around financial record keeping including for the purposes of Gift Aid.

## **5. TYPES OF PERSONAL DATA WE PROCESS AND HOW IT IS OBTAINED**

The Foundation Office has a separate database from the other departments at the School. Our database contains personal information collected by the School during the course of our relationship with pupils, alumni, parents, supporters and friends.

Information we hold includes:

- Biographical information including your name, gender and date of birth;
- Your contact details and communication preferences;
- Your education history;
- Your student clubs and societies affiliations and your other connections with Latymer;
- Your professional activities and employment;
- Your interests and extra-curricular activities;
- Information publicly available on the internet;
- Your volunteering activity for the School including alumni volunteering;
- Your family and partner/spousal details;
- Your relationships with other Latymer alumni, donors and friends;
- photographs from events and relevant information about your time at the school and subsequent education;
- Your donation history;
- Bank details for the purposes of processing donations;
- Records of communications and interactions we have had with you;
- Your attendance at Latymer events.

Please note that we do not collect or store any credit/debit card details in our database.

Most of the information we hold is obtained directly from you, for example information that you provide on entry to the School. When pupils leave, they can provide their contact details by registering on our alumni database. We also collect personal data from you when you participate in events and activities or donate to the School.

We do not use third-party companies to research or profile but we may analyse publicly available information about potential donors to contact you about initiatives and events that may interest you, or to make appropriate requests. This includes information on professional social media networks such as LinkedIn.

To ensure that our communications are relevant to you and your interests, we may use additional information such as geographical information and measures of affluence where

available from publically available external sources to assist us. This enables us to better understand you as our supporter and make appropriate requests for support. Depending on your privacy settings and interaction with us on social media sites like LinkedIn, Facebook, Graduway (Latymer Connects) and Twitter, we may also cross-check your data to ensure that it is robust and up to date.

As a charity, we may have to carry out due diligence regarding any generous donations which you make to the School. This may involve obtaining and recording your personal information from sources such as 192.com, LinkedIn, the Charity Commission, Business Week and related media articles.

## **6. WHO HAS ACCESS TO PERSONAL DATA AND WHO WE SHARE IT WITH**

Occasionally, we will need to share personal data with government authorities such as HMRC and if you interact with us through a third party (for example if you support the School via the CAF Donate giving platform).

For the most part, personal data collected by us will remain within the School, and will be shared with other departments in the School for specific purposes (eg to organise a careers networking event or to ask a former pupil if they wish to speak at a school event).

We will also share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as the Parents Guild, UK Latymerian Council and US Friends of Latymer.

Some of our processing activity is carried out on our behalf by third parties such as database providers, web developers and event booking platforms. Digital tools may be used to monitor the impact of the School's communications, such as using email tracking to record when an email we send to you has been opened. This is subject to contractual assurances that personal data will be kept securely and only in accordance with the School's agreement and/or specific direction. We would never sell your data to a third party.

We retain details of our former pupils indefinitely so that we can communicate with you as part of our alumni community. You may change your contact preferences at any time (see Your Rights below). If you have requested we no longer keep in touch with you, we will need to keep a record of the fact (called a "**suppression record**") in order to fulfil your wishes, so that we do not inadvertently add you to our mailing list in future.

## **7. YOUR RIGHTS**

Please refer to the School's Privacy Notice for more information on the individual's rights under Data Protection Law.

You can tell us at any time that you do not wish to receive fundraising or other information promoting our activities and events. You can also change your communication preferences by contacting us at [info@latymerfoundation.org](mailto:info@latymerfoundation.org)

**Consent:** You always have the right to withdraw consent where given or otherwise object to direct marketing or fundraising. Please be aware that we may not be relying on consent to process your data but may have another lawful reason to process the personal data in question without your consent.

**Rights of access:** Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School, and in some cases ask for it to be erased or amended or have it transferred to others, or for the School to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the School's Compliance Officer (see contact details above).

The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

The School will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

**Accuracy:** We will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. You can ask us to erase or correct any out of date, irrelevant or inaccurate information we hold about you (subject to certain limitations and exemptions under Data Protection Law). Please contact the School's Compliance Officer if you want to amend your personal information.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

## **8. THIS POLICY**

We will review and update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

## **9. QUERIES AND COMPLAINTS**

Any comments or queries on this policy should be directed to the School's Compliance Officer using the contact details above.

If you believe that we have not complied with this policy or acted otherwise than in accordance with Data Protection Law, you should contact the Privacy and Compliance Officer. You can also make a referral to, or lodge a complaint with, the **Information Commissioner's Office (ICO)** [www.ico.org.uk](http://www.ico.org.uk) **Helpline 0303123 1113**, although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.