



# Privacy Notice OFA

---

## Introduction

This notice is to help you understand how and why Finton House School, on behalf of the School's alumni group The Old Fintonians' Association (OFA) collects personal information about you when you become a member of the OFA. It also explains the decisions that you can make about your information. It has been written with regard to the General Data Protection Regulations, the Data Protection Act 2018, and other related legislation. This notice applies in addition to the School's Data Protection Policy. This is available on the school website or from the office on request.

Finton House School is a data controller for the purposes of the Data Protection Act 1998 and is registered as such with the ICO. The School has appointed a Data Compliance Co-ordinator, who will deal with all requests and enquiries concerning the school's uses of personal data and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

## Why the School needs to process personal data

In order to carry out its ordinary duties to OFA members the school may process a range of personal data about them. Some of this activity the school will need to carry out in order to fulfil its legal rights, duties or obligations. Other uses of personal data will be made in accordance with the school's legitimate interests, or the legitimate interests of the OFA, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

## Legitimate Interests

The school expects that the following uses may fall within that category of its (or the OFA's) "legitimate interests":

- For the purposes of contacting alumni when they reach the age of eighteen in order to invite them to join the OFA;
- Identifying new applicants and enrol them into the OFA;
- To be able to communicate with members, share school news and invite them to events;
- Maintaining relationships with alumni including direct marketing or fundraising activity;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (e.g. by the Charities Commission);
- Where otherwise reasonably necessary for the school's purposes.

In addition, the school may need to process **special category personal data** (concerning health, ethnicity, religion or sexual life) in accordance with rights or duties imposed on it by safeguarding law. These reasons may include:

- To safeguard members' welfare and provide appropriate medical care (if necessary) during OFA events, and to take appropriate action in the event of an emergency, incident or accident,



including by disclosing details of an individual's medical condition where it is in the individual's interests to do so: for example for medical advice;

- For legal and regulatory purposes (e.g. health and safety) and to comply with its legal obligations and duties of care.

## **Types of personal data processed by the School/OFA**

This may include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details;
- bank details and other financial information, e.g. about OFA members making donations to the school;
- where appropriate, information about individuals' health, and contact details for their next of kin;
- images of members attending OFA events or engaging in activities related to their membership of the OFA.

## **How the school collects data**

Generally, the school receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However in some cases personal data may be supplied by third parties (for example another school, or other professionals or authorities working with that individual); or collected from publicly available resources.

## **Who has access to personal data and who the school shares it with**

Occasionally, the school may need to share personal information relating to its community with third parties, such as professional advisers (lawyers and accountants) or relevant authorities (e.g. The Charities Commission). For the most part, personal data collected by the school will remain within the school, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

However, a certain amount relevant information will need to be provided to staff more widely in the context of providing the necessary duty of care to members. For example this may include dietary requirements or food allergies provided to the catering team.

Finally, in accordance with Data Protection Law, some of the school's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions.

## **How Long We Keep Personal Data**

The school will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. If you have any specific queries about how this policy is applied, or



wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Data Compliance Co-ordinator who is the relevant person handling such requests at school. Similarly should you wish to access or amend your personal data, or wish it to be transferred to another person or organisation limit or object to any use of your data, or would like further information about what data is being held, please contact the Data Compliance Co-ordinator in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the school may need nonetheless to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

## **Consent**

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Please be aware however that the school may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual such as a request for membership of the Old Fintonians' Association.

## **Data Accuracy and Security**

The school will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the Data Compliance Co-ordinator of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected. The school will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

## **This Policy**

The School will 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.

## **Queries and Complaints**

Any comments or queries on this policy should be directed to the [Data Compliance Co-ordinator](#).

If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the school [complaints / grievance] procedure and should also notify the Data Compliance Co-ordinator. The individual can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator.

To contact the Information Commissioner's Office: <https://ico.org.uk/>

ICO helpline: 0303 123 1113.