

Norwich School's Development Office Privacy Notice

Version 01 - 02 March 2022

Introduction:

Norwich School is committed to protecting the privacy of everyone we have contact with and we take our legal responsibilities in this regard very seriously. This Notice sets out how we intend to handle your personal data. To this end we fully endorse and will adhere to the principles of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

This Privacy Notice sets out what information we collect about you, how we use that information and your rights as the data subject.

We reserve the right to update this Privacy Notice and will provide you with an updated version if any substantial updates are made. This Notice can be found on our website.

Former pupils are known as Old Norvicensians (hereafter "ONs"). Engagement with supporters and ONs is the responsibility of Norwich School's Development Office. All former pupils are automatically enrolled as ONs for life. Contact amongst supporters and ONs long after their school journey is over is acknowledged as playing an important and positive part in their lives, so appropriate and timely communication is for mutual benefit.

1. Sharing your Data:

The default position is that data held will not be shared any more than is deemed in the discretion of the school to be absolutely necessary.

Within Norwich School, only individuals who have legitimate and authorized access to the provided data will be granted secure access to our database and to the data files held on the school's secure IT network (eg One Drive).

Outside of the Norwich School staff, your data may be shared with:

- Relevant parties if we are under a legal obligation to do so, including child safeguarding, or for the prevention of criminal offences including fraud or because of a Court Order.
- HMRC, in so far as is legally required eg gifting/donations/legacies
- A small number of reputable third-party organizations who may require such data for legitimate, specific and limited purposes to perform an externally sourced activity such as the annual mailing of the ON Magazine or Christmas Cards. In such instances this data will be securely transferred and deleted by the third party as soon as the purpose has been executed and at all times conducted under an appropriately worded, specific and legally binding Data Protection Agreement.

2. Data Storage:

Some of our data storage systems are provided by third parties. Our principal database used for the storage of data is provided by Blackbaud, a leader in such services and the major international provider to many institutions, via their CRM database tool called Raisers Edge. Data is stored securely, with external access only for support issues. The Blackbaud database is also used for processing event bookings and donation payments.

Your data held by Blackbaud will be stored on its cloud-based systems outside the European Economic Area. Blackbaud is based in USA and Norwich School has Standard Contractual Clauses in place to act as appropriate safeguard.

Your data will never be subject to automatic decision-making. Automated decision-making occurs when an electronic system uses personal information to make a decision without any human intervention.

3. Where we collect your data from:

Data is initially collected from your pupil or staff record if you have worked or studied at Norwich School. Additional data is otherwise collected during various touch points, for example if you update us, communicate with us in any meaningful way, if relevant information is made available publicly, or if you make any donation or payment or if you attend an event.

4. What personal data we hold about you:

Personal data means any information about an individual by which that person can be identified. The Development Office holds personal data about a variety of categories and include the following non-exhaustive fields:

- Personal details (names, date of birth, gender)
- Contact details (addresses, phone numbers, emails)
- Dates attending / attended school
- Links with school and between other members of the school community
- Interests
- Employment history
- Events attended and payments made
- Information about your giving – donations, pledges, indication of leaving a legacy
- Publicly available material on the individual
- Voluntary support
- Contact preferences, consents, Gift Aid authorisations etc
- Log of meaningful interactions between the school and yourself
- Any other information that may be exchanged during communications with the individual and Norwich School

5. Purposes for processing your personal data:

Norwich School's Development Office processes personal data to support the school's operations, in particular:

- ON and supporter engagement as part of the external community of the school
- Events management
- Fundraising and donation administration
- Operational, management and governance reporting

6. The Lawful Basis for processing your personal data:

The personal data held by Norwich School is processed under the following lawful reasons:

- Legitimate Interest as a lifelong supporter of our institution. This may include sending service communications even if you have opted out of marketing
- When you have given consent for us to do so
- Complying with our legal obligations for example Gift Aid requirements on donations

7. Retention period:

Your data is kept in line with the school's retention period policy, but, as Norwich School views its relationship with members of the school community as life-long, most data on its Blackbaud database will be retained indefinitely, unless requested otherwise. Some types of data, for example that which relates to financial transactions, is retained in line with legal requirements.

8. Protecting your data:

Norwich School complies with its obligations as set out under GDPR and relevant Data Protection legislation by ensuring that:

- Personal data is kept up to date
- Personal data is stored and destroyed securely
- Collected and retained personal data is not excessive
- Personal data is protected from loss, misuse, unauthorized access and disclosure
- Appropriate technical and physical security measures are in place

9. How your data is stored:

Data is stored within Raiser's Edge (a data management system) which is hosted by Blackbaud. Other data is also stored on the Norwich School IT network.

10. Your data and your rights:

Under GDPR, individuals have rights relating to the data that is held about them. Norwich School is committed to the principle of data being owned by you, to transparency with you on such data and to the right of deletion of your data at any time. These rights include:

- Right to be informed of the data we hold
- Right of access to data we hold on you
- Right for inaccuracies to be corrected
- Right to restriction of data processing
- Right to portability
- Right to erasure in certain circumstances
- Right to object to processing of data

Please note in certain circumstances the ability to exercise a right may be restricted where it is lawful to do so or if there is a lawful obligation to do so.

It is your responsibility to ensure that the personal data we hold about you is accurate and up to date. Please inform of us of any changes or updates to your personal data as soon as they occur. Norwich School cannot be held responsible for errors or omissions where this has not happened.

11. How to contact us

If you have any questions about the data held about you by Norwich School, wish to ensure that the data held is accurate and up to date, or wish to exercise one of your rights, please contact us via:

EMAIL: development@norwich-school.org.uk

PHONE: +44 (0)1603 728 430

POST: 71a The Close, Norwich, NR1 4DD (FAO: Development Office)

We reserve the right to make a small charge where the request is onerous or unduly time-consuming.

If you are unsatisfied or have concerns about how Norwich School is handling your data in relation to the GDPR and the Data Protection Act, we recommend in the first instance you raise such concerns with the School's Head Master at hm@norwich-school.org.uk or by phone or post shown above.

If still unsatisfied, you may choose to complain to the Information Commissioner's Office (ICO) at <https://ico.org.uk/>

Jonathan Pearson, Development Director

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Dated 02 March 2022