



**Hills
Education
Trust**



**Hills Road
Sixth Form
College**

Privacy Policy for Alumni, Donors and External Parties

Our Commitment to You

At Hills Road Sixth Form College, we prioritise the protection of personal privacy. Any personal data you provide will be treated in accordance with this notice, current legislation and our Data Protection Policy. We recognise our responsibilities to process and manage personal information fairly and properly. This policy outlines how we handle your personal information, including any third parties with whom your information may be shared.

Collection and Use of Personal Information

We collect and use personal information to maintain contact with alumni and donors and manage relationships with external parties. This information may include, but is not limited to, your name, contact details, date of birth, and details of your association with the College.

Purpose of Processing

We process personal data for the following purposes:

- To maintain contact with alumni and provide updates about the College
- To maintain contact with donors
- To organise and manage fundraising, networking, charitable and other College events and activities
- To facilitate networking opportunities among alumni
- To make fundraising appeals
- To manage relationships with external parties, including suppliers and partners
- To comply with legal obligations and protect the legitimate interests of the College

Special Categories of Data

With your consent, we may collect special categories of data, such as dietary requirements for events.

Our legal grounds for using your personal data

The College will only use your information when the law allows it to. We rely on the following legal bases for processing your personal data:

- Where you have provided us with consent to process your personal data for a specific purpose
- Where the processing is necessary for the performance of a contract
- We will use your personal data for the purposes of the College's legitimate interests, such as to continue a new or pre-existing relationship with you, to share College news or for fundraising purposes
- Where it is necessary for compliance with a legal obligation
- Where it is necessary to protect you or someone else's vital interests, for example in an extreme emergency
- For the public interest, and where the task or function has a clear basis in law.

Consent

Where the College asks for your consent for a specific use of your personal data, you may take back this consent at any time. Please be aware however, that the College may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

Analysis and research of our supporters and potential supporters

By building a picture of those who support, or could potentially support Hills Road Sixth Form College, we are able to improve the level of service that we provide, and better understand your interests and preferences so that we are talking to you about what interests you – this in turn means we can fundraise more efficiently and make sure your donation has the greatest possible impact.

When we build a picture of our supporters/potential supporters we may use:

- Your donation history with Hills Road
- Geographic, demographic, and other information you have provided to Hills Road
- Publicly available information, including Companies House, 192.com, and information that has been published in newspapers/articles.

We also carry out due diligence in advance of asking supporters for major donations. Before seeking or accepting large donations we are required to conduct checks, including reviewing publicly available data relating to criminal convictions and offences, to ensure that by accepting the donation we are not risking the reputation of Hills Road.

Data Sharing

We may share your personal information with third parties for the purposes outlined above. This includes:

- Service providers/external data processors who assist us in managing alumni relations and organising events, for example database provider ToucanTech and e-mail marketing platform MailChimp
- Regulatory bodies and authorities to comply with legal obligations.
- Other alumni and external parties for networking purposes, with your consent.

Any such companies are acting as our data processors and the contracts we enter with them require them to comply with UK data protection laws; to process your information only for the purposes we specify, and to make sure they have the appropriate controls in place to protect the security of your information.

Transfers of data outside the UK

In some cases, some of the services we provide or some of the processes we use may involve personal information being transferred outside the UK, for example where any data processors' servers are located in Europe or elsewhere.

If we do transfer personal data outside the UK, it will only be done to a country or territory with which the UK has adequacy regulations. This includes the European Economic Area and the US (the latter through certification under the UK Extension to the EU-US Data Privacy Framework).

Data Security and Retention

The College takes the security of your personal data seriously. It has internal policies and controls in place to ensure that your personal data is not lost, accidentally destroyed, misused or disclosed, and is accessed only by those who need to know the information for the performance of their duties.

We will hold your personal information on our systems for as long as is necessary for the relevant activity, for example we will keep a record of donations subject to gift aid for at least seven years to comply with HMRC rules.

If you request that we stop sending you marketing materials we will keep a record of your contact details and appropriate information to enable us to comply with your request not to be contacted by us.

If you have pledged a legacy gift to the College, we may keep data you provide to us indefinitely, to carry out legacy administration and communicate effectively with the families of people leaving us legacies. This also enables us to identify and analyse the source of legacy income we receive.

Your Rights

You have the right to:

- Obtain confirmation that we are processing your personal information
- Access your information

- Withdraw consent to processing at any time by e-mailing development@hillsroad.ac.uk.
- Have inaccurate or incomplete personal data rectified.
- Request the deletion or removal of personal data in specific circumstances.
- Restrict processing of personal data in specific circumstances.
- Object to processing of personal data in specific circumstances.
- Data portability in specific circumstances.
- Object to decisions being taken by automated means
- Require us not to send your marketing or fundraising communications.

Requesting access to your personal data

You have the right to request access to the information that we hold about you free of charge unless the request is for an excessive amount of information in which case we can charge a reasonable fee. We will provide the information without delay and within one month of receipt of the request unless the request is for excessive information or particularly complex, in which case we can delay the period by a further two months. To assist us with responding efficiently to your request it is helpful if you are able to specify the information to which the request relates. To make a request for your personal information, contact foirequest@hillsroad.ac.uk.

Reporting Concerns

If you have any concerns about how we are collecting or using your personal data, please contact our Data Protection Officer at foirequest@hillsroad.ac.uk. If you are not satisfied with our response, you can raise your concern with the Information Commissioner's Office at www.ico.org.uk.

Contact Us

For any questions or requests regarding your personal information, please contact us at foirequest@hillsroad.ac.uk.

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