



# THE BRITISH SCHOOL OF PARIS

## **Data Protection Statement**

The British School of Paris is a co-educational British independent day school for pupils aged 3-18

### **How we use alumni and other supporters of the BSP's (The British School of Paris) personal information.**

This statement explains how The British School of Paris (“we” and “our”) handles and uses data we collect about alumni (“you” and “your”). In broad terms, we use your data to manage the ongoing relationship between the School and you as part of our lifelong community of scholars, including keeping in touch with you, keeping up to date on your achievements, and engaging with you on how you can continue to contribute to School life and otherwise support the School.

We will retain your data indefinitely or until you request us to do otherwise. When changes are made to this statement, we will publish the updated version to our website and notify you by other communications channels as we deem appropriate or necessary.

The controller for your personal data is The British School of Paris. The person responsible for data protection from September 2018, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data, is Nicholas Hammond:

[headmaster@britishschool.fr](mailto:headmaster@britishschool.fr)

### **Where does the data come from?**

The personal data that we retain originates from you via the following sources:

- School application forms/employment forms
- Alumni update forms
- Responses to electronic communication as well as unsolicited communication from other students/families possibly concerning friends or acquaintances.
- References from job applications
- Staff /data /police background checks protection forms
- Proof of address documentation including bank/tax statements etc.

We may also add to the data you have given us by incorporating information from public sources that we consider to be reliable (e.g. your public social media profile(s), Queen’s Honours List, Companies House, high profile news reports or articles etc.)

### **How your data is used by the School**

We collect and process your personal data, as specified below, for a number of purposes, including:

A. maintaining a formal record of your academic progress and achievements at The British School of Paris and elsewhere;

B. retaining a formal record of your career or other life achievements in order to promote and improve the reputation of the School and help you to network with other School members effectively;

C. engaging you in School events that we believe will be of interest to you, including alumni and open events, volunteering opportunities, and other ways you can contribute to the life of the School;

D. sharing marketing and fundraising materials which may include information about School life and the development of the School, major initiatives and programmes relating to either the academic



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endeavour or the provision of services and facilities to members and the wider public as well as other news, events and fundraising appeals, and other ways you can become involved with us;

E. encouraging you to make a financial contribution to the School and processing any such contributions;

F. assessing the likelihood that you will, now or in the future, make a financial contribution (gift) to the School;

G. promoting the School via our online channels to grow our network and supporter base;

H. promoting third party services we believe will be of interest to you.

Further details are provided in the Annex. If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address given above.

### **Communications**

Providing a Privacy Notice

This privacy notice is available at all times via our website. There is also a link on our on-line alumni form. If you are a new contact for the School via our on-line form, we will ask you at the outset how you would like to receive news and other communications from us. If you already receiving such communications, you may change your preferences or ask us to stop sending you news and other communications completely by contacting the School via: [alumni@britishschool.fr](mailto:alumni@britishschool.fr). You may request changes at any time.

### **How we share your personal data**

We share data on a considered and confidential basis, where appropriate, with:

- volunteer partners closely related to us (e.g. School trustees, development board members, alumni group representatives), and
- contractors providing services to you on our behalf or services to us (our “data processors”), while under contract to provide services to the school

We also facilitate communication between individual alumni (of the School), but in doing so we do not release personal contact details without prior permission.

Any transfers of your data overseas or to international organisations/schools, as set out above, are protected by either by an adequacy decision by the European Commission or by standard data protection clauses adopted by the European Commission (which are available from our Data Protection Officer) or, before 25 May 2018, by a self-assessment of adequacy.

### **Retention Policy**

The British School of Paris considers its relationship with alumni and supporters to be lifelong, and we will hold your details until you tell us you no longer wish to hear from us. We will always try to ensure that the data we hold for you are up to date, reasonable and not excessive.

### **Our legal basis for processing your information**

Some activities (for example sending you emails about our activities and news of the School) require your consent. If the law requires your consent to process data in a certain way then we will obtain it before carrying out that activity.



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In some circumstances the law requires us to disclose information to another party. An example is the reclaim of tax on Gift Aid. If you Gift Aid a donation, then we are required to tell HMRC the name and postcode of the donor and the date(s) and amount(s) of any such donation.

For all other activities the legal basis for processing your personal data is that it is necessary for the purposes of our legitimate interests, where we have concluded that our interests do not impact inappropriately on your fundamental rights and freedoms. Practically speaking this means we carry out an exercise to check that we will not cause you harm by processing your data, that the processing is not overly intrusive and that we will only do so in a way which is described in this privacy notice.

### **Your rights**

You have the right: to ask us for access to, rectification or erasure of your data; to restrict processing (pending correction or deletion); to object to communications or direct marketing; and to ask for the transfer of your data electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

Where you opt out of all future communications or exercise your right to erasure, we will continue to maintain a core set of personal data (name, subject(s), examination results, unique School identification number and date of birth) to ensure we do not contact you inadvertently in future, while still maintaining our record of your academic achievements. We may also need to retain some financial records about you for statutory purposes (e.g. Gift Aid, anti-fraud and accounting matters).

Please note for all such requests, be it to prevent direct marketing, profiling, withdrawal etc, please write to [alumni@britishschool.fr](mailto:alumni@britishschool.fr)

You retain the right at all times to lodge a complaint about our management of your personal data with the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### **ANNEX**

We collect and process your personal data, as specified below, for a number of purposes, including:

A. maintaining a formal record of your academic progress and achievements at the School and elsewhere-

We retain personal data (provided by you), including:

- current name and any previous names you have had;
- unique personal identifiers (e.g. student number, CRSID, date of birth, photograph);
- your current and previous contact details;
- your application details, our assessment of your application and the details of any offer(s) of study we have made;
- records of your academic provision from the School (including supervisions, School examinations and other academic support);
- matriculation and graduation details and records of your academic qualifications (including those prior to becoming a member of the School);
- other details of your academic progress or achievement (e.g. School awards or prizes).



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B. retaining a formal record of your career or other life achievements in order to promote and improve the reputation of the School and help you to network with other School members effectively-

We retain personal data (provided by you), including:

- details of your achievements since you completed your course(s) of study;
- membership of School and external clubs and societies (including alumni groups);
- previous and current employment status (including retirement), including job title, sector, income and work contact details, dates of employment.

When you provide this information, we may use this material (unless you notify us otherwise) in our public literature, and may use this information for other purposes outlined in this statement. In some instances if appropriate, we will seek specific approval for such inclusion.

We may supplement information from other public sources that we consider to be reliable (e.g. your public social media profile(s), Queen's Honours List, Companies House, high profile news reports or articles) and may check their accuracy with you from time to time.

C. engaging you in School events that we believe will be of interest to you, including alumni and open events, volunteering opportunities, and other ways you can contribute to the life of the School-

We retain personal data (provided by you or created by us), including:

- known relationships with other members (past or present) of the School;
- your previous attendance at School events;
- information about your areas of personal interest;
- personal data relating to your attendance at events and your personal preferences (e.g. dietary or accommodation requirements or requests);
- records of any communications (verbal or written) we have had with you, including the purpose and outcome of those communications.

We may supplement information from other public sources that we consider to be reliable (e.g. your public social media profile(s), University publications, high profile news reports or articles) and may check their accuracy with you from time to time.

D. sharing marketing and fundraising materials which may include information about School life and the development of the School, major initiatives and programmes relating to either the academic endeavour or the provision of services and facilities to members and the wider public as well as news, events and fundraising appeals, and other ways you can become involved with us-

We retain personal data (provided by you, or created by us), including:

- any communication preferences confirmed by you;
- ways in which you have supported the School.

If you provide us with contact details for a particular method of communication (i.e. your email address or phone number) we will use them to communicate with you by this method, unless you ask us not to.



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E. encouraging you to make a financial contribution to the School, and processing any such contributions-

The School's income consists of gifts and benefactions, income derived from prudent investment of fees. We value any financial contribution from our members and, accordingly, retain personal data (provided by you or created by us), including:

- the purposes and amounts of any donations or other support previously provided to the School by you;
- the method(s) of payments used and related payment references;
- your bank details (for processing direct debit or other financial transactions);
- your tax status and Gift Aid/tax declaration.

Some of this financial information needs to be retained for statutory purposes for a number of years (e.g. Gift Aid, anti-fraud and accounting matters). When you provide this information, we will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement.

F. assessing the likelihood that you will, now or in the future, make a financial contribution (gift) to the School-

The School undertakes research to determine your capacity to provide financial support. This results in us creating and using personal data including:

- your estimated income or asset worth (where this is not provided by you);
- your potential capacity to make a gift, including our internal classification of you as a major gift prospect which is determined by a combination of your giving history, your attendance at School events, and your other interactions with the School since you graduated, including any positive or negative indications from you about your capacity or willingness to give to the School;
- gifts you have made to other charitable organisations.

Our research includes incorporating information from public sources that we consider to be reliable (e.g. your public social media profile(s), Queen's Honours List, Companies House, high profile news reports or articles). In using these sources, we have considered the potential intrusion of your privacy. In most cases, our assessment above aims to exclude you from unwelcome or inappropriate approaches so as not to compromise your ongoing relationship with us.

G. promoting the School via our online channels to grow our network and supporter base-

The School administers a number of online social networking groups (for example via Facebook and LinkedIn) that alumni, parents and friends can choose to join. These are a vehicle for promoting the School and engaging our network and supporter base. We also send communication about the School via these social media. These groups are administered and used in accordance with the terms and conditions of the social media provider and individuals can choose whether they join these networks. The School might also obtain your personal data through your use of social media depending on your settings or the privacy policies of these social media services.



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H. promoting third party services we believe will be of interest to you-

We may use information that you supply to help us find more people like you, so that we can grow our supporter base through our online channels. We use third party services to do this which you are likely to be familiar with, including Google, Facebook and Twitter.

If you would like to contact us about anything in this document, or how we communicate with you, please contact us here: [alumni@britishschool.fr](mailto:alumni@britishschool.fr)