

KRISHNAMURTI FOUNDATION TRUST

Privacy Notice for Alumni, former parents, former staff and other supporters of the Trust

The Krishnamurti Foundation Trust Ltd consists of Brockwood Park School, Krishnamurti Centre and Foundation office. In this document they are all referred to as Foundation or School. For the purposes of the Data Protection Act 2018, the Trust is the "data controller" of personal data Alumni, former parents, former staff and other supporters of the Trust ("your personal data").

The purpose of this Privacy Notice is to explain how and why the Trust collects personal information about you when carrying out alumni relations and fundraising activities. It aims to help you understand what personal information is, how and why we collect and process your personal information and our legal reason for doing so. It also explains your rights and the decision that you can make about your own information.

A member of the School Management Committee, Tom Power, is responsible for overseeing data protection matters at the School and is our Data Protection Officer. Questions about this privacy notice or the School's use of personal information should be directed to him at tom@brockwood.org.uk.

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

What is "personal information"?

Personal information is information that identifies you as an individual and relates to you. This includes your contact details, your relationship with the Trust and donation amount information.

What personal information does the Trust hold about you and how is this obtained?

We receive information about you from other teams within the Trust but only where this is relevant to our work. We hold a specific database with information about alumni, parents, staff, former parents, former staff donors and other supporters.

You provide us with information about yourself during the course of our relationship with you. For example, when you sign up to receive communications from us or when your child attended the schools.

We are grateful to individuals for sharing their professional experiences with students in order to inspire them through talks and mentoring and internships.

We will hold information such as:

- the dates when you or your child attended the School (if applicable);
- if you are a former staff member the dates when you worked at the Trust;
- your contact details;

- information about your achievements and interests;
- where you attended university and your occupation (if applicable);
- information about any bursaries or scholarships you have received;
- how you like to hear from us e.g. whether you have signed up to receive emails from us;
- your involvement with us e.g. if you carry out mentoring of current pupils;
- records of any donations;
- your Gift Aid status if applicable;
- information from articles in the media;
- copies of correspondence;
- any dietary requirements for catering purposes that you have provided; and
- any disability which you may have so that we may make reasonable adjustments for you.

Why do we use your personal information?

We use your information in the following ways:

- to keep you informed about events and activities and in relation to your attendance at those events;
- to facilitate interaction between members of the Brockwood community;
- to keep you informed about what is happening at Brockwood;
- in connection with providing financial support for the charitable aims of the Trust; and
- in connection with the other ways in which you might support the Trust; (such as when you volunteer).

We may contact you for the above purposes by email, telephone and post. If you tell us that you do not want to be contacted for any of these purposes please refer to the section below on:

What decisions can you make about your information?

We may take photographs or videos of you to use in our publicity, which may include printed material, social media platforms and website.

We may screen the details we have for you against third party databases so that we can check that we have up-to-date contact details for you.

How and why does the Trust share your personal information with third parties?

If you use a third party platform to donate then we will receive information about you from them.

If you use a third party platform to book onto an event (eg. Eventbrite), then we will receive information about you from them.

In accordance with our legal obligations, will share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns.

On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders.

We may also need to share information with our legal advisers for the purpose of obtaining legal advice. We will need to share information if there is an emergency, for example, if you are hurt whilst on School premises or at one of our events.

We may need to share information with contractors who help us with our work (e.g. a printing company for our literature).

Our legal grounds for using your information

Legitimate interests: This means that we are using your information when this is necessary for our legitimate interests, except when your interests and fundamental rights override our legitimate interests. We rely on legitimate interests to use your information for all of the purposes described above unless consent applies (in which case see below). Specifically, we have a legitimate interest in:

- ensuring that there is an active community of supporters which will benefit the Trust and members of the community, such as current and former pupils, parents and staff;
- promoting the objects and interests of the Trust. This includes fundraising e.g. if we want to raise money as part of our annual appeal;
- safeguarding and promoting the welfare of our pupils with whom you may be in contact e.g. if you arrange work experience or mentor a pupil; and
- ensuring that we comply with our legal obligations.

If you object to us using your information where we are relying on our legitimate interests as explained above please speak to our Data Protection Officer.

Consent: You can withdraw your consent for us to use your information at any time. Any use of your information before you withdraw your consent remains valid. To withdraw your consent please contact our Data Protection Officer at email: tom@brockwood.org.uk

Necessary for a contract: We will need to use your information in order to perform our obligations under a contract with you. For example, we need your name and contact details so that we can send you tickets for a concert that you want to attend.

Legal obligation: On some occasions we will need your information to comply with a legal obligation. For example, we may need to keep a record of who is attending an event so that we can comply with our health and safety obligations.

Vital interests: For example, to prevent someone from being seriously harmed or killed.

The Trust must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or gender orientation.

The Trust's grounds for processing special personal information will depend on the circumstances:

Vital interests: To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Legal claims: The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers. These two conditions may also apply if we ever need to process information about criminal convictions and offences.

Sending your information to other countries

We may send your information to countries which do not have the same level of protection for personal information as there is in the UK, e.g. when communicating with you if you live overseas, or storing your information on computer servers based overseas. The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here:

http://ec.europa.eu/justice/data-protection/internationaltransfers/adequacy/index_en.htm

If the country that we are sending your information to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then, in the absence of any other safeguards, it might not have the same level of protection for personal information as there is in the UK.

Where appropriate we may put in place additional safeguards, for example, if we are using a third party to process a payment then we may ask them to contract with us using model data protection clauses provided by the European Commission in the absence of any other appropriate safeguard. If you would like more information about the safeguards that are in place please contact our Data Protection Officer.

For how long do we keep your information?

We will keep information about you for as long as we need to do so, in compliance with our data protection and other legal obligations. For example, we will need to retain contact details for you for so long as you want to be part of the school community so that we can communicate with you.

We will also need to keep a record if you tell us that you do not want to hear from us anymore, so that we do not inadvertently add you to our mailing list in the future.

We will keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the Trust.

The Trust will also keep information for a long time as part of its wider legal and regulatory obligations, even if that information is no longer needed for marketing, alumni relations or fundraising purposes. For more information on how personal information is used by the Trust more widely please contact our Data Protection Officer. A member of the School Management Committee, Tom Power, is responsible for overseeing data protection matters at the School.

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What decisions can you make about your information?

From May 2018, data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- **Rectification:** if information is incorrect you can ask us to correct it
- **Access:** you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to
- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information
- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer in certain circumstances
- **Restriction:** our use of information about you may be restricted to simply storing it in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy
- **Object:** you may object to us using your information where:
 - we are using it for direct marketing purposes (e.g. to send you the Annual Appeal/School newsletter)
 - the legal ground on which we are relying is legitimate interests
 - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons.

To exercise any of your rights you can submit your request in writing to our Data Protection Officer.

Further information and guidance

This notice is to explain how we use your personal information.

Please speak to our Data Protection Officer if:

- you object to us using your information for marketing purposes e.g. to send you information about fundraising events. We will stop using your information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about you.

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office - ico.org.uk.