

Direct Marketing Fundraising Privacy Notice

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Applicable to:	Staff, Students and Parents
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Direct Marketing & Fundraising

How we use Personal Data

The BRIT School is committed to protecting your privacy and being transparent about what we do with it. We are committed to using your personal information in accordance with all applicable laws concerning the protection of personal information. We will not do anything with your information you wouldn't reasonably expect. We will use the information that we collect about you in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR).

The BRIT School is the data controller for all Personal Data and Sensitive Personal Data collected, processed, and handled at the School.

The categories of personal data that we collect, hold, and share

Personal Data:

Personal information: name, address (including country of residence), telephone number(s), email address, your occupation and professional activities, philanthropic activity and memberships; records of pledges, donations and Gift Aid status, where applicable (as required by HMRC); information about your wealth, including net worth; media articles about you; Details of businesses you are or were a Director of

Social media: profile name/address

Date of birth: in order to verify your age/eligibility

Sometimes we may ask you to provide sensitive information, for example when you book for certain events or participate in other activities. Sensitive data is held securely and restricted to those within the organisation who need to use it. We will ask you for this information, which you are free to decline to provide. This data is used for limited, specific purposes. It is used in a way that is adequate, relevant, and not excessive, and is only kept for as long as is necessary.

CCTV Images

The BRIT School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff, and visitors, and to prevent the loss or damage to school property.

Please refer to our CCTV Policy for further information. This can be found at:

<https://www.brit.croydon.sch.uk/page/?title=Data+Protection+Policy&pid=1050>

Why we collect and use this information

We seek consent to process data for the following purposes:

- Events & Performances; News & Developments; Fundraising & Campaigns; Building profiles and targeting communication.
- Research potential to give to the school and collect additional details relating to

employment and philanthropic activity We will only process your data where you have clearly given us consent to do so, with a positive opt-in.

How we use your data

Events & Performances

With your consent, we will from time-to-time contact you about events and performances at the BRIT School, and/or our trusted partners – we will never share your data with third parties without your consent.

News & Developments

With your consent, we will from time-to-time contact you about News & Developments at the BRIT School, and/or our trusted partners
– we will never share your data with third parties without your consent.

Fundraising & Campaigns

With your consent, we will from time-to-time contact you about current and future fundraising campaigns at the BRIT School, offering you the opportunity to support the important work we do in the creative and performing arts. With your consent, we may share your

Building profiles and targeting communications

Our donors tell us that tailored and relevant communication is a priority for them and we constantly review this and listen to you to make sure we are getting this right. We want to ensure our communications to our supporters are personal, relevant, and timely and we want to give you an enhanced experience.

We may analyse geographic, demographic, and publicly available information relating to you in order to understand your interests, to send you the most relevant communications and to give you an exceptional experience at our events.

We use profiling techniques to ensure communications are relevant and timely, and to provide an improved experience to our supporters. Profiling also allows us to target our resources effectively. We do this because it allows us to understand the background of the people who support us and helps us to make appropriate requests to supporters or to tailor our services to better suit them.

Importantly it enables us to provide you with a service that is better suited for your needs while raising more funds, sooner, and more cost-effectively, than we otherwise would.

We will only use your data for profiling if you have given consent for us to process your data for Fundraising & Campaigns. You can update your consent preferences at any time by sending an email to development@brit.croydon.sch.uk You may also unsubscribe from visiting www.brit.croydon.sch.uk/unsubscribe or emailing unsubscribe@brit.croydon.sch.uk (please ensure you use the email address we have recorded against your consent).

The lawful basis on which we collect and use this information

All personal and sensitive data held by The BRIT School will be processed fairly, lawfully and in a transparent manner. We will only use the data for the purposes specified above, and for explicit and legitimate purposes.

The BRIT School will collect and hold personal and sensitive personal data for the following lawful basis:

Contractual Processing

Where data is collected for the sale of Box Office tickets, merchandise, or other

products including one-off donations & recurring donations, the following legal basis for processing personal data applies:

- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (Article 6, Section 1.b of the General Data Protection Regulation (EU) 2016/679).

This data is used for limited, specific purposes. It is used in a way that is adequate, relevant, and not excessive, and is only kept for as long as is necessary for us to process your order and perform the sales order contract between us.

Consent (outside of Legitimate Interests)

Where a data subject has registered to receive email notifications and/or promotional information from us or agreed to take part in a survey the basis of our processing will be subject to consent; we will ask you for and can be withdrawn at any time.

The school collects this data for purposes of direct marketing and fundraising. In this scenario, and where no other legal basis for processing is identified, we will seek consent from the data subject before collecting, handling, and sharing personal data.

Why we seek consent

- Where the processing of data is beyond what a data subject would reasonably expect from the school, and is not covered by any identified lawful basis for processing
- If we intend to share the data with other agencies - except those we are legally obligated to do so for pupils and employees. In this case, the 'other agencies' will be specified
- For all photographic and video footage – we will give the data subject the opportunity to opt-in to each specific category of usage

Withdrawing consent

You are free to withdraw your consent at any time. To do so, please visit <https://www.brit.croydon.sch.uk/page/?title=Unsubscribe&pid=1053> or email unsubscribe@brit.croydon.sch.uk (please ensure you use the email address we have recorded against your consent).

School Fundraising, Wealth Screening & Donor Management

We may carry out wealth screening, a process which uses trusted third-party partners to automate some of this work. We may use information gathered from the sources listed under 'exactly how we use your data and what data we hold'.

Where email is used to communicate regarding fundraising and donations, we will rely on consent, unless included in a newsletter informing the recipient of news and events at the school, where the allocations of donations and the opportunity to donate may be referred to.

The BRIT School will collect, hold and process personal data under the following lawful basis, with the understanding that parents would reasonably expect the school to process their data for this purpose:

- ***processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. (Article 6, Section 1.f of the General Data Protection Regulation (EU) 2016/679).***

Data accuracy & Information available publicly

In the interests of ensuring data accuracy, we may from time-to-time obtain personal information about you from other sources, and may combine information you provide to us with information available from external sources in order to gain a better understanding of our audiences, visitors, and supporters to improve our fundraising and marketing methods. Such information could be for example, socio-demographic and lifestyle information and information about previous donations you have made.

The information we get from other external sources may depend on your privacy settings or the responses you give, so you should regularly check them. For example, you may have provided permission for a company or other organisation to share your data with third parties including charities.

We may also obtain information about you where it is publicly available and found in places such as Companies House, Land Registry website, your biography on your work website or Linked In, and information that is published in articles and newspapers. We will only use publicly accessible information where the source can be verified, and accuracy of the data proven.

Storing Data

Your personal data will be held and processed on The BRIT School's systems or systems managed by suppliers on behalf of The BRIT School. We maintain customer relationship management (CRM) systems to hold contact details and a record of your interactions with The BRIT School such as ticket purchases, donations, complaints, and attendance at special events. Where possible we aim to keep a single record for each customer.

Your data is always held securely. Access to customer information is strictly controlled. The CRM system can only be accessed by people who need it to do their job. Certain data, for example some sensitive information, is additionally controlled and is only made visible to members of staff who have a reason to work with it.

Please note that it is technically possible for the hosted CRM systems (Salesforce) to be accessed by employees of the school from outside the EEA. Should this be a concern, please contact the Data Protection Officer using the details at the end of this document, or by emailing dpo-brit@brit.croydon.sch.uk.

Information sharing

The table below provides a detailed overview of the information that we collect and share and the purpose for collecting that information. This is the information the school and our named third parties may use and process.

We will NEVER sell your data or pass it on to 3rd parties for marketing purposes. We will only transfer data to 3rd parties who are acting as our agents with a data sharing agreement in place.

DATA PROVIDED TO/FROM THIRD-PARTIES WITHIN THE UK

HMRC	Claiming gift Aid and compliance
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DATA PROVIDED TO/FROM THIRD-PARTIES OUTSIDE THE UK

MAIL CHIMP	Used for emailing and communications
NON-UK TAX BODIES	Under legal requirements under the relevant local law where donations are provided.
PUBLIC SOURCES OF INFORMATION	
LINKEDIN AND OTHER SOCIAL MEDIA SITES	Provides personal details, contact information and business details. To maintain our obligation to keep accurate records and assist with prioritising fundraising activities.
COMPANIES HOUSE	Provides details of directorships, past and current, in addition to contact details. To maintain our obligation to keep accurate records and assist with prioritising fundraising activities.
ELECTORAL REGISTER	To confirm address details, under our obligation to maintain accurate records and assist with prioritising fundraising activities.
SEARCH ENGINES E.G. GOOGLE, YAHOO, BING	To confirm address details, under our obligation to maintain accurate records and assist with prioritising alumni and fundraising activities.
WEALTH SCREENING	
FACTARY	Independent research agency and consultancy for the non-profit sector, providing research, due diligence and wealth screening services. (Link to their Privacy Policy: https://factory.com/about-us/privacy-policy/#:~:text=What%20is%20this%20policy%20for,clients%20(%E2%80%9Cclients%E2%80%9D).)
PROSPECTING FOR GOLD	Provides research, wealth screening, consultancy and training support to charities of all sizes. (Link to their Privacy Policy: http://prospectingforgold.co.uk/privacy-policy/)
WEALTH ENGINE	Research services firm for non-profit organisations and financial services companies.
NEWS: FT ONLINE, GOOGLE ALERTS, FACTIVA	To update information where relevant

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information that we hold about you, which we will provide without undue delay and *free of charge.

To make a request for your personal information, please complete the Subject Access Request form, which can be found on our website by [clicking here](#), alternatively, you can contact the Data Protection Officer by emailing dpo-brit@brit.croydon.sch.uk

* When a request is manifestly unfounded or excessive, particularly if it is repetitive, we will charge a fee of £10. . We will charge a fee of £10 to comply with requests for further copies of the same information. This fee does not apply to subsequent access request, where the information differs from that previously provided.

Your Rights under Data Protection Law

You have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress.
- prevent processing for the purpose of direct marketing.
- object to decisions being taken by automated means.
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations.

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance, by contacting the Data Protection Officer (dpo-brit@brit.croydon.sch.uk).

Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Addendum 1 – Wealth Screening

As a fundraising organisation, The BRIT School may undertake in-house research and from time-to-time engage specialist agencies such as Prospecting for Gold and Factory to gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, social networks such as LinkedIn, political and property registers and news archives. We may also carry out wealth screening to fast track the research using our trusted third party partners. You will always have the right to opt out of this processing.

We may also carry out research using publicly available information to identify individuals who may have an affinity to our cause but with whom we are not already in touch. We also use publicly available sources to carry out due diligence on donors in line with the charity's Gift Acceptance Policy and to meet money laundering regulations.

This research helps us to understand more about you as an individual so we can focus conversations we have with you about fundraising and volunteering in the most effective way, and ensure that we provide you with an experience as a donor or potential donor which is appropriate for you.

If you would prefer us not to use your data in this way, please email us at <mailto:development@brit.croydon.sch.uk> and/or dpo-brit@brit.croydon.sch.uk.

Alternatively, please call us on **020 8665 8600**.

Further information on the Wealth Screening process, as carried out by Prospecting for Gold, can be found on their website:

<http://prospectingforgold.co.uk/prospect-research2017/wealth-screening-2017/>

Direct Marketing & Fundraising

Contact

If you would like to discuss anything in this privacy notice, please contact:

Data Protection Officer

Judicium Consulting Limited 72 Cannon Street
London EC4N 6AE

Tel: 020 326 9174

Email: dataservices@judicium.com



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