



PRIVACY NOTICE

INTRODUCTION

The “Wellington Community Office” is the name given to a function of The Wellington College, a charity registered with number 309093 (the **College**) (the **WCO**). The purpose of the WCO is to develop and maintain relationships between parents, alumni, parents of alumni, current and former staff and other members of the Wellington Community (collectively, **Community Members**) with the College and with each other by providing updates and organising events and to raise funds for the College through charitable donations.

The College is a data controller for the purposes of data protection legislation as we process personal data. This notice is designed to give you information about how we process that data. Our duties in respect of personal data are very important to us and we are committed to using the personal data we hold in accordance with the law. The College’s Legal & Compliance Director is responsible for data protection at the College including within WCO and will endeavour to ensure that WCO complies with its responsibilities. Any questions about how we process your personal data within WCO should be directed in the first instance to community@wellingtoncollege.org.uk and, if any further information is required, to the Legal & Compliance Director at data@wellingtoncollege.org.uk or by post at The Bursary, Wellington College, Duke’s Ride, Crowthorne, RG45 7PU.

This notice applies alongside any other information the College may provide about a particular use of personal data, for example when collecting data via an online or paper form. This notice supplements the College’s Privacy Statement and should be read in conjunction with that and our other policies and contracts which apply to you and which make reference to personal data. This includes any contract you have entered into with the College, our safeguarding, pastoral and health & safety policies, our IT policies and our retention of records policy. Separate privacy notices apply to Wellington College Enterprises Limited and our employees.

WHAT TYPE OF PERSONAL DATA DOES THE WELLINGTON COMMUNITY PROCESS?

WCO processes personal data about Community Members. The personal data we process takes different forms (it may be factual information, opinion, images or other recorded information) and the type of data processed will depend on your relationship with the WCO. Examples of the personal data we process include:

- names;
- addresses, telephone numbers, email addresses and other contact details;
- contact preferences;
- engagement with the College, including events attended;
- details of education at the College and activities and areas of interest;
- details of further and higher education;
- current interests and activities;
- audio and video recordings;

- donations and other philanthropic gestures, whether to the College or to other charities;
- relationship to other Community Members;
- employment and professional activities and interests;
- following receipt of certain donations, financial and tax information; and
- if publicly available, information on financial assets.

In some circumstances, we may also need to process special category personal data (for example, regarding health or religion) and criminal records information. Where we process this type of data, we will either rely on rights or duties imposed on us by law or with explicit consent.

HOW DOES THE COLLEGE COLLECT PERSONAL DATA?

The WCO collects personal data provided through the College's admissions process, events, conversations held in the course of involvement with College staff and through change of address or donation forms. However, some of our data may be collected from publicly available sources of information or from data enrichment services provided by carefully selected third parties.

WHO HAS ACCESS TO PERSONAL DATA?

For the most part, personal data held by the WCO will remain within the WCO and will be processed by members of staff within that office for the purpose for which the data was collected as well as by members of staff of the College and the College's trading subsidiary, Wellington College Enterprises Limited, who will provide various support functions to the WCO, for example, regarding event management, payment systems and catering. As an organisation, we have taken appropriate technical steps to protect your personal data and have implemented policies addressing use of technology.

Some of the College's systems are provided by third parties with some being hosted by the College and others externally. Those hosted internally include certain finance and administrative functions. Those hosted externally include the WCO CRM database, the WCO website and online community website, the College's website and event booking systems, including those used to register attendance for virtual events. The organisations providing these systems are aware of the requirements of current data protection legislation.

In certain circumstances, we share personal data (including, where necessary, special category personal data) with third parties in order to further the objectives and interests of the WCO and facilitate the efficient operation of the WCO. Examples of the third parties with whom we share personal data are the relevant authorities (such as the Local Children Safeguarding Board, DBS, the Charity Commission the Independent Schools Inspectorate, the Information Commissioner), the emergency services, third parties who run or support activities and events on behalf of or in conjunction with the WCO and the College's professional advisers.

WHY DO WE PROCESS PERSONAL DATA?

Your pre-existing relationship with College establishes a legitimate interest in our sharing with you news of developments at Wellington, our fundraising programme generally, and in the social and networking opportunities that we offer to our community.

We process personal data to support the College's operations, objectives and interests. This broad purpose encompasses the following:

- **alumni activities and events;**
- **the promotion and organisation of events**, through our websites, other publications and communications including the use of photographic images that may also include pupils;
- **fundraising**, including mail and email appeals, direct marketing, wealth screening, appeal segmentation and volunteering assignments;
- **conducting appropriate donor due diligence**, including confirming the identity of any prospective donor and carrying out any background checks considered necessary;
- **College communications**, including the Year Book, invitations to events plus WCO communications include the termly What's On guide, monthly updates, project updates, annual reports and OW newsletters;
- **updates on College activities and correspondence promoting the aims of the College;**
- **career development events**, including careers evening and workshops for current students, Career Opportunity Group events for OWs and networking events for parents and OWs.

In some situations, we have to carry out these processes in order to meet our legal obligations, whether they are imposed on us by law or through contract. In other situations, we have obtained the consent of the relevant individual to the particular processing of the data. WCO has determined that it has a legitimate interest in all of the remaining processes we conduct.

FOR HOW LONG DO WE KEEP PERSONAL DATA?

Personal data will be kept securely and for no longer than is necessary or required by law. As this period will vary depending on the piece of personal data and the purpose for which it was collected, we have adopted a Retention Policy which details the time periods for each different category. If you have any specific questions in respect of retention of personal data by the WCO, please direct them to the Legal & Compliance Director. .

WHAT RIGHTS DO YOU HAVE IN RESPECT OF YOUR PERSONAL DATA?

If we process personal data about you, you have a number of rights in respect of that data. Subject to certain exemptions and limitations specified by law, you can:

- require WCO to change incorrect or incomplete data;
- require WCO to delete your data;
- withdraw your consent to WCO processing certain personal data where WCO is relying on your consent to do so;
- object to WCO processing your data where we are relying on our legitimate interests to do so;
- require WCO to transfer your personal data to another organisation; or
- access and obtain a copy of your data on request.

If you would like to exercise any of these rights, please contact the Legal & Compliance Director by email at data@wellingtoncollege.org.uk or by post at The Bursary, Wellington College, Duke's Ride, Crowthorne, RG45 7PU. We will respond to such written requests as soon as is reasonably practicable and in any event within the time limits permitted by law. WCO will be better able to respond quickly to smaller, targeted requests for information.

THIS NOTICE

The College will update this notice from time to time. Any substantial changes that affect your rights will be notified on our website and, as far as reasonably practicable, notified to you.

If you believe that WCO or the College has not complied with this notice or acted other than in accordance with data protection laws, you should notify the Legal & Compliance Director. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (**ICO**), although the ICO recommends that steps are taken to resolve the matter with the College before involving the regulator.

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