



COPTHORNE
PREP

Alumni Privacy Notice

Who We Are

Cophthorne Preparatory School is a 'data controller' for the purposes of Data Protection Law*; this means that the School determines how people's personal information is processed and for what purpose.

Cophthorne Prep School is registered at Cophthorne School Trust Ltd, Effingham Lane, Cophthorne, West Sussex, RH10 3HR. Company Number 1239211. Registered Charity number 270757.

What This Privacy Notice Is For

This notice is to help you understand how and why the Alumni Office collects personal information about you and what we do with that information. It also explains the decisions that you can make about your own information.

This information is provided because Data Protection Law gives individuals the right to understand how their data is used. Alumni, staff and parents are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

If you have any questions about this notice please contact the Alumni Office (contact details are provided at the end of this privacy notice).

Why The Alumni Office Needs To Process Personal Data

We collect information about members of our school community to help us carry out our work. The School relies on legitimate interests for most of the ways in which it uses your information. This means that the School uses your personal data in accordance with the legitimate interests of the School, or others, so long as these are not outweighed by the impact on you and does not involve special or sensitive types of data. Specifically, the School has a legitimate interest in:

- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity.
- Maximising opportunities for pupils past and present to benefit from the expertise of our school community.
- Enabling alumni to keep in touch with their school friends and teachers, socialise and network professionally.
- Publicising and promoting the School in effective ways utilising all appropriate communications channels, using photographs, videos and images in our publicity and on our social media platforms and website.
- Organising social and cultural events for alumni and the school community all over the world.
- Raising funds to benefit school life, improve the school infrastructure and provide fee support via bursaries and scholarships.
- Confirming the identity of prospective donors and their background and donor due

diligence, in line with our fundraising and donations acceptance policies.

- Promoting the objects and interests of the School.
- Facilitating the efficient operation of the School.
- Ensuring that all relevant legal obligations of the School are complied with.

Types Of Personal Data Processed By The School

• **Personal details** (name, date of birth, sex, nationality, names of family members, relationships with other members of the school community) is collected for the upkeep of our records

• **Contact details** (address, email address, telephone number) helps us to keep our community up to date on news from the school, upcoming events, volunteer opportunities and fundraising appeals

• **School and university information** (school years, university institution, university course, university years) helps us organise university-based or school year reunion events

• **Professional details** (occupation, employer, nature of business) helps us organise professional networking events and also helps us to identify members of our community who could potentially help our pupils in finding work experience/internships or volunteer within our wider careers programme

• **Interests and hobbies** to help us create events and communications which appeal to our school community e.g. invitations to a golf event

• **Donation information** (donation amount, date, purpose/restriction, regular payment details, Gift Aid eligibility, Gift Aid address) is stored and processed to maintain accurate financial records for the school, and to comply with guidelines of both the Charities Commission and HMRC.

• **Photographs** from the school archive and those taken at school events are stored and used in our communications to publicise our work. We use photographs or videos in our publicity and on our social media platforms and website.

• **Interactions with members of our school community** (school events attended, correspondence, communication preferences) help us to communicate with our school community appropriately and at sensible intervals.

Please note that we do not store any credit/debit card details.

How The School Collects Data

We collect this information from the following sources:

- Correspondence sent directly to the Alumni Office e.g. emails with updated contact information
- The School's pupil management system, iSAMS
- School publications, such as The Cophornian
- Information collected when leaving the School e.g. Senior School destinations
- Publicly available online sources and information publically shared on social media e.g. job title on LinkedIn
- Donation forms and data collection forms (both in paper form and online) sent to the School
- As a fundraising organisation, we undertake in-house research and from time to time engage specialist agencies to gather information from publicly available sources, for example, Companies House, the Electoral Register, company websites, media 'rich lists', social networks such as LinkedIn, property registers and news archives. 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.

Who Has Access To Personal Data And Who The School Shares It With

For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

In order to carry out the day-to-day operations of the department, a number of third party agents are occasionally contracted to supply services to the school. These organisations require temporary or project specific access to some of the personal data we hold. For all of the below, agreements are in place to ensure that data is stored, transferred, processed and destroyed in line with the school's privacy and data management protocols.

- Name and email data is transferred to Mailchimp, an emailing house, to assist us on sending emails to our community.
- Name and school information that is provided by alumni to the school via the website is processed by Fastnet, who host the Old Cophornians website.
- Upon request, the school is legally obliged to share any of the above personal information with government authorities e.g. police, HMRC.

Data will not be disclosed to external organisations other than those acting as agents for the school, with whom the school has data sharing agreements. The school does not sell or swap any of its data to third parties and does not allow its agents to provide its data to third parties.

How Long We Keep Personal Data

In all cases, the School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate reason. If you have any specific queries about how this policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Alumni Office. However, please bear in mind that the School may have lawful and necessary reasons to hold on to some data.

Keeping In Touch And Supporting The School

In order to keep our community informed of news from the School and its activities, we contact alumni, current parents and past parents from time-to-time. This may be in the form of a monthly newsletter, annual magazine, direct personalised contact (i.e. email, telephone), letters and event invitations.

If, at any time, you do not wish to hear from us about a particular matter, via a certain communication channel, or indeed at all, you can let us know at any time by contacting oldcophornians@cophorneprep.co.uk

Your Rights

• Rights of access

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School, and in some cases ask for it to be erased or amended or have it transferred to others, or for the School to stop processing it - but subject to certain exemptions and

limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, should put their request in writing to the Data Protection Officer. The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits (which is generally one month, but actually fulfilling more complex or multiple requests, e.g. those involving third party information, may take 1-2 months longer).

The School will be better able to respond quickly to smaller, targeted requests for information made during term time. If the request for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider or require a reasonable fee for the administrative costs of complying with the request, or in certain cases refuse the request (but only where Data Protection Law allows it, and in accordance with relevant regulatory guidance).

• Requests that cannot be fulfilled

You should be aware that GDPR rights (including the right of access) are limited to your own personal data, and certain data is exempt. This will include information which identifies other individuals or information which is subject to legal privilege for example legal advice given to or sought by the School or documents received in connection with a legal action.

You may have heard of 'the right to be forgotten'. However, we will sometimes have compelling reasons to refuse specific requests to amend or delete or stop processing your personal data; for example, for a legal requirement or where it falls within the legitimate interest identified in the Privacy Notice. Generally, if the School still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. All such requests will be considered on their own merits.

Data Accuracy And Security

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible.

An individual has the right to request that any inaccurate or out-of-date information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law).

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices and access to School systems. All staff and Trustees will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

This Policy

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

Queries And Complaints

Any comments or queries on this policy should be directed to the Data Protection Officer by email - dataprotection@cothorneprep.co.uk.

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School complaints or staff grievance procedure as appropriate and should also notify the Data Protection Officer. 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 School before involving the regulator.

Key Terms

'Data Protection Law'

UK General Data Protection Regulation (UK GDPR) which sits alongside the UK Data Protection Act 2018 (DPA 2018).

'Data controller' means organisations, including independent Schools, that determine how people's personal data is processed and for what purpose.

'Data Subject' means any living person whose data the Data Controller processes.

'Processing' means any action in relation to that personal data, including filing and communication.

'Personal Data' includes everything from which a Data Subject can be identified.

Some categories of Personal Data are **'special category data'**, for example racial or ethnic origin, religious beliefs, health or biometric data. Extra protection is provided for these data.

Special Category Privacy Notices

This Privacy Notice is accompanied by supplementary privacy notices for Pupils (under 12 years and over 12 years), Parents and Staff.

Contact Details for the Alumni Office

Email: oldcophornians@cophorneprep.co.uk

Tel: 01342 859962

Last Reviewed Date: June 2026

Next Review Date: January 2027