



# GONZAGA COLLEGE SJ

## Privacy statement

November 2018

### Introduction

This privacy statement provides information on how Gonzaga College SJ development office uses Personal Data for purposes relating to school development. These purposes include actively engaging with individuals within the school and wider communities to enable the development and maintenance of a lasting, life-long relationship with the school.

The mission of the school's development office is:

- To engage with the school's worldwide community (including current and former parents, pupils, staff and donors)
- To build awareness of school activities and developments, both ongoing and planned
- To identify and engage with prospective donors.

This statement should be read alongside other relevant privacy documentation that has been published by the school, for example, the school's overall *Data Protection Policy*. It should also be noted that all activities within Gonzaga College that depend upon the collection and use of personal data, take place under the formal control of the Board of Management (the body accountable as the Data Controller for the school although the day to day implementation of all school policies is the responsibility of the school principal).

### Why do we need to process personal data?

The future development of the school, including development and construction costs for new facilities is reliant on support from the wider community. Without this generous support such developments would not be possible.

The College operates the Fr. John Sullivan Access Program which is reliant on the support of voluntary donors. The program is an important part of the school's mission to promote inclusion.

The purposes for which the school development office uses personal data includes the following:

- maintaining a record of the school's relationship with members of its community, donors and prospective donors
- sending publications (e.g. magazines, development updates, etc)
- event invitations and alumni networking.
- invitations to support student development (careers talks, work placement, etc).
- research in order to improve our understanding of our alumni and supporters, inform our fundraising strategy and target our communications more effectively
- administration purposes including routine financial management and administration including issuing receipts for donations, processing tax relief for donations received, addressing donation requirements determined by the Revenue Commissioners etc.

## Legal bases for using your information

Whenever the school is engaged in processing personal data, we ensure that each processing activity relies upon an appropriate lawful basis. This means that one or more of the following will apply:

- (i) you have given your consent to processing for one or more specific purposes;
- (ii) processing is necessary for compliance with a legal obligation to which the school is subject;
- (iii) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the school;
- (iv) processing is necessary for the purposes of the legitimate interests pursued by the school or by a third party.

The principal legal bases underlying the processing of personal data undertaken by the school development office are set out below.

Legitimate Interest. This means using your information is necessary for the School's legitimate interests (you have the right to object at any time to this processing and it is not allowed if your interests and fundamental rights override our legitimate interests).

Specifically, the School has a legitimate interest in:

- Publicising and promoting the School in effective ways. This may include using photographs of you at our school events in promotional material.
- Raising funds to benefit school life, improve the School infrastructure and provide fee-support via bursaries and scholarships.
- Maintaining relationships with alumni and the school community, including fundraising activity.
- Maximising opportunities for pupils past and present to benefit from the expertise of our wider community of supporters.
- Enabling former pupils to keep in touch with their school friends and teachers, socialise and network professionally.
- Confirming the identity of prospective donors and their background and donor due diligence.

Necessary for contract. We may use your information to perform our obligations under a contract with you, for example, to send you tickets for an event you wish to attend.

Legal obligation. We may use your information in order to comply with a legal obligation, for example, to comply with Revenue rules and ensure that any large donations are legally given.

Performance of a task carried out in the public interest. For example when we use your information to facilitate the efficient operation of the School.

Consent. We may ask for your consent to use your information in certain ways as an alternative to relying on any of the bases above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. (You can revoke this consent at any time. Please speak to the school if you would like to withdraw any consent given.)

## What personal data is processed and for what purposes?

- (i) We collect personal information (name, date of birth, relationship with other members of the School community) for the upkeep of our records. Contact details (address, email address, telephone number) help us to keep our community up to date on news from the School, upcoming events and activities including fundraising.

- (ii) We collect professional details (occupation, employer, nature of business, employer location) to identify members of our community who could potentially help our pupils in finding work experience/internships, or volunteer within our wider careers programme.
- (iii) We keep details of your interests and hobbies to help us create events and communications which appeal to our school community (e.g. any interest in philanthropy and volunteering, golf events for those who have indicated an interest).
- (iv) Photographs from the school archive and those taken at school events are stored and used in our communications to publicise our work.
- (v) Donation/Financial information (donation amount, date, purpose/restriction, regular payment details) is stored and processed to maintain accurate financial records for the School, and to comply with Charities Regulator and Revenue Commissioners guidelines.
- (vi) We may supplement any data provided to us by using publicly available information such as directorships, trusteeships, philanthropic history, geographical information, public measure of affluence, networks, news to help us learn more about our community members and focus our fundraising efforts.
- (vii) We will keep details of school events attended, correspondence and communication preferences to help us communicate with our school community appropriately.

### **How we collect and secure data and how long we keep it**

Generally, the School receives Personal Data from the individual directly. For example, a significant proportion of the information we hold on alumni, friends and supporters comes from them filling in a form, or by corresponding with us by telephone, email or otherwise.

In a few cases Personal Data may be supplied to us by third parties (for example another supporter) or collected from publicly available resources. If these circumstances we will contact you at an early opportunity to tell you how, and for what purpose, it has been supplied to us (unless we know that you have already been made aware of this information).

The period for which we retain your information is determined by the specific purpose for which the data is being processed. This means that we must delete your data if when it is no longer required to serve a particular purpose. We will also delete your personal data if you ask us to do so (and there is no other legal basis that requires us to retain that data).

## **Who has access to your data**

For the most part, Personal Data collected by the School Development Office 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).

Under certain very limited circumstances we may need to share your data with other parties (see the school's *Data Protection Policy* for full details). In each case there will always be a legal basis underlying any such sharing.

For example, our accountants may access some personal data when they audit our accounts. Similarly the Revenue Commissioners may require some sharing of personal data when confirming the validity of charitable donations. Every data controller who requires access, however limited, to some of the personal data processed by the school is bound by the terms of the relevant data protection legislation.

In other examples, some of the school's processing may require support from specialist service providers. For example, the school may use remote IT back-up and restore services to maintain data security and integrity. In cases such as these, where we use specialist data processors, we will always prioritise your data privacy through for example, ensuring that the appropriate security guarantees have been provided and that there is a signed processing agreement in place.

In some limited circumstances, your information may be processed outside the European Union, for example where we store information on computer servers based overseas; or we communicate with you when you are overseas. Under EU law this third country transfer can only take place where there are privacy safeguards in place. For further details see the school's Data Protection Policy.

## **Your rights**

Regardless of where you are resident, your data protection rights are protected under Irish and European Law. It is generally accepted that the European GDPR provides a privacy regime that is amongst the strongest privacy environments applicable anywhere in the world. Your full rights, and information on how to access them, are described in the school's Data Protection Policy. You can also refer to the website of the Irish Data Protection Commission, [www.GDPRandYOU.ie](http://www.GDPRandYOU.ie)