



## **Guildhall School of Music & Drama Advancement Privacy Policy**

The Guildhall School is committed to upholding your privacy and taking care with the personal information that you may give to us. From 25 May 2018, we shall process your personal data in accordance with the General Data Protection Regulation (or GDPR for short).

Due to GDPR coming into effect, we are publishing an Advancement privacy policy that relates specifically to individuals that the Guildhall School's Advancement division (Development & Alumni Relations, Marketing & Communications) undertakes activity with. These include:

- Alumni of the Guildhall School
- Donors and prospective donors to the Guildhall School
- Audience members who have booked a ticket for a Guildhall School event (usually via the Barbican Box Office or via the Development Office) or have signed up to a mailing list
- Members of the Guildhall Circle
- Parents/guardians of Guildhall School students
- Professional contacts (eg. agents)
- Volunteers for the Guildhall School

This Notice complies with requirements under the Privacy and Electronic Communications Regulations 2003 (PECR) and GDPR. The Guildhall School is a department of the City of London Corporation, PO Box 270, Guildhall, London EC2P 2EJ, who is the data controller for the School.

This Notice explains how the Guildhall School of Music & Drama will collect and use your personal data for alumni, marketing and development activities. We will tell you how we obtain and process your data and what to do if you would like to update your communication preferences. Where we refer to 'the Advancement database', we are referring to the database on which all data for our division of the School is stored.

### **Why do we hold your information?**

We are a world-leading conservatoire and drama school, offering young people an inspiring environment in which to develop as artists. To continue to do this, we need to know about the people who interact with us, and we want to be able to tell people about the work we do.

The data that we hold is used by the Advancement office to shape and inform our activities, so that we can provide you with opportunities to be involved in the vibrant community of the Guildhall School. Marketing, alumni relations and fundraising materials that we might share with you include information about upcoming performances, our activities and their impact, our news, events, and fundraising appeals, and other ways you can get involved with the School.

## **How do we collect data?**

We collect information about you from a number of sources:

- Directly from you, when you join a mailing list, sign up for a Development or alumni event, make a donation, volunteer, make a request through the Advancement office or otherwise provide us with your personal information.
- If you book a ticket for a Guildhall School event via the Barbican box office and ask to be added to our mailing list, your data will be passed to us securely. The City of London is the data controller for both the Barbican and the Guildhall School; you can find the [City of London privacy policy here](#).
- If you make a gift to the Guildhall School via the Charities Aid Foundation or the British Schools & Universities Foundation, your data will be passed on to us securely in order to administrate your gift.
- Your information may be shared with us by independent event organisers, for example the fundraising site [Just Giving](#) and [EventBrite](#). These third parties will only share your data with us when you have indicated that you wish to be contacted by us, or where it is required as part of processing your gift/booking. You may like to read their Privacy Policy when you provide your information to understand fully how they will process your data.
- If an existing supporter or volunteer gives us your data and suggests we get in touch, we will first establish a legal basis to do so, and then provide you with full details of how we use your data and your rights on first point of contact.
- We may also receive information about you from publically available sources, such as LinkedIn or a news article.

## **What will we use it for?**

We use your data for a range of purposes, including:

- To send you timely, relevant and appropriate messages about the work of the Guildhall School. This may include e-newsletters, events guides and personal invitations.
- To carry out administrative tasks, or to uphold our legal obligations. For example, recording gift aid claims or upholding donor requests in regard to public crediting.
- For statutory and regulatory compliance, for example if the data is required by the National Crime Agency.
- To make appropriate requests for philanthropic support, helping us to raise more money, more cost effectively, and more respectfully than we otherwise could. In order to do this, we may carry out research, profiling and wealth screening, to ensure the best possible experience for prospective supporters. Please see below for further information about these processes.
- In order to comply with the Charity Commission Regulations, we may use your data to perform due diligence research in order to ensure donation funds do not present an ethical or reputational risk to the School.
- We may use your data to help us to understand how to send targeted information, based on demographic, geographical and social information, and any interests you have told us about. This helps us to produce cost effective and relevant mass communications.

### **Research**

We may use your data to conduct in-house research, augmenting the data we hold through publically available information sources such as media, professional networks, Companies House or publically directed social media posts (eg. Twitter). Some research, such as due-diligence, is a legal requirement in order to comply with Charity Commission regulations (as detailed above).

### **Profiling**

We may use profiling to assess the likelihood that you may be interested in hearing from us, and engaging with the work we do to develop outstanding young artists. We may analyse financial, philanthropic and other data we hold to tailor our engagement with you.

### **Wealth Screening**

We may on occasion use wealth screening to help us identify people who may be able to support us with a philanthropic gift. Wealth screening is a service used widely in the charity sector to improve fundraising activity by gaining a better understanding of our supporters, and ensuring we approach prospective donors in an appropriate way. Trusted third-party organisations who carry out these tasks on the School's behalf (eg. Factory) are heavily regulated by the ICO and any wealth screening activity carried out is done so securely and in compliance with data protection legislation.

*You have a specific right to ask us not to carry out these kinds of data processing, though we hope that by doing so, we will ensure a better and more tailored experience for you. If you do not want your data to be processed in a specific way, please see details of how to let us know below.*

## **What data do we collect?**

Personal data held and processed by the Development, Alumni and Marketing Departments may include:

- Biographical information including your name, gender and date of birth
- Contact details such as address, email and phone number, and your communication preferences
- Employment details, history and biographies where relevant to our needs
- Your relationship to Guildhall School staff, students alumni or donors
- A record of any correspondence you have had with the Advancement office
- Registration, booking details and attendance at Guildhall School events
- Current areas of interests and hobbies where relevant to our needs
- Information from publicly available sources such as media articles
- Financial information and interest in philanthropy, where relevant to our needs
- Family and partner/spousal details where relevant to our needs
- Information you have chosen to share via online services such as LinkedIn or Just Giving

In addition;

### **If you are a donor, volunteer or Guildhall Circle member:**

We may also collect:

- Details of volunteering activity you have undertaken on behalf of the Guildhall School
- Donation history, fundraising appeals and proposals
- Information about how you would like your donation to be credited
- If you are a regular donor and pay by direct debit, we may hold your bank details

We will also use your data to administer donations, volunteering programmes, and membership of the Guildhall Circle where relevant.

### **If you are a parent/guardian:**

We may also collect:

- Details of your relationship to a student/former student
- Information about the course of study undertaken by the related student

### **If you are an alumnus/alumna:**

If you were a full time or part time student on any of the senior programmes at Guildhall we consider you as alumni. After you complete or leave your course, your information will be transferred to the Advancement database from the Student Records system. After your expected Graduation year, the Advancement database becomes the primary record of your ongoing relationship with the School.

The student name and course of Junior Guildhall students will be retained as an institutional record only. Junior Guildhall students are invited to join the alumni community and pass on their details once they leave Junior Guildhall at the age of 18.

### **What data do we collect?**

In addition to the details mentioned in this policy, if you are alumni we may also hold the following information on your record:

- Information about the course/courses that you enrolled on or completed
- Details of volunteering activity you have undertaken on behalf of the Guildhall School or your interest in volunteering

### **Why do we collect it?**

In particular for alumni, we will use data to ensure that communications, invitations and information you receive from us is targeted and relevant. For example, you may receive specific communications about alumni activity in your geographical region, or that is relevant to your area of study.

In accordance with your communication preferences we may email or post you invitations to alumni events such as reunions, careers networking events, surveys, lectures or shows, and mail you our alumni magazine and e-newsletter.

On a one-to-one basis, we may get in touch if we have a particular request, such as hosting a masterclass, completing an interview or asking your permission to share your successes or achievements with fellow alumni.

## **Special category data**

Special category data such as medical information or access needs will be stored by the School only if you give us permission to do so. This information is stored securely and is only accessed by key staff who will use this information to ensure you have the best possible interaction with the School. This data will only be held for as long as we have a relationship with you (see data retention below).

## **Legal basis and legitimate interests**

The law requires us to tell you the legal basis on which we process your data.

Some activities (for example, sending you emails which promote the School's interests) require your consent. If the law requires your consent to process data in a certain way then we will obtain it before carrying out that activity.

Other activities are carried out to fulfil a contract or agreement (for example, sending you tickets for an event you have booked). If a contract is in place then we will process your data based on that contract.

In some circumstances the law requires us to disclose information to another party. An example is the reclaim of tax on Gift Aid. If you Gift Aid a donation, then we are required to tell HMRC the name and postcode of the donor and the date(s) and amount(s) of any such donation, otherwise we are unable to claim Gift Aid on your gift.

We may also process your data because we have a legitimate need to do so in order to deliver our alumni services, fundraising and event marketing. We may only do so if we can demonstrate a business need, and so long as your 'interests or your fundamental rights and freedoms are not overriding'. Practically speaking, this means we carry out an exercise to check that we will not cause you harm by processing your data, that the processing is not overly intrusive and that we only do so in a way which is described in this privacy notice. An example is where a current supporter suggests we get in touch with you as you have an interest in the work of the School.

## **How do we keep your information safe?**

The Guildhall School commits to holding your data securely and treating it with sensitivity.

All personal data that we hold is stored on the Advancement Database with appropriate security measures in place. Any staff with access to this information have completed the City of London data protection training and further specialist database training with our data team. Our database can only be accessed by people who need it to do their job.

## **Do we share your data?**

The Guildhall School will never pass information to third parties except in the following cases outlined below. Under these circumstances, we always make sure that appropriate controls are in place regarding how your data is handled and will ensure they never use the data for non-Guildhall School of Music & Drama purposes. We will never sell your information to a third party.

Why we would disclose your data:

- We may need to disclose your information if required to by law (see above)
- To external service providers such as data processors/agents on our behalf, to help provide benefits and services. This may include email services to send emails and newsletters, mailing houses to send out postal letters and magazines, and companies to screen names and addresses to help keep addresses up to date, or to provide wealth screening (see above). A contract is always in place with a data processor to ensure they only use your data for the purpose we have requested.
- In order to facilitate media relations activity and the production of marketing material and alumni/donor communications, we may share your details with external agencies/freelance professionals who carry out these activities on our behalf. We only disclose information necessary to deliver that service and there will always be a contract in place to ensure your information is kept secure.
- The Advancement database is currently hosted externally by Blackbaud, a supplier of software for non-profit organisations. The service Blackbaud provides is strictly regulated in accordance with data protection legislation and adequate safeguards are in place to protect your data.
- We may need to share your data with our associated charity, the Guildhall School Trust, when it relates to the processing or acceptance of a donation. In this instance, we would only share information that enables the Trust to fulfil its statutory duties to the Charity Commission and Fundraising Regulator. When data is shared, it is done so in compliance with data protection law.
- We may share basic information on the attenders at an event with the host, alumnus or another person who has a volunteer role in the School and who has signed a privacy agreement with us.

## **How long do we keep your data?**

We will always try to ensure that the data we hold for you is up to date, reasonable and not excessive. We review our retention periods for personal information on a regular basis, and all data is retained in compliance with data protection law. Whilst we consider our relationship with our alumni, supporters and events audiences to be lifelong, we will only hold data relevant to carry out the work of the Guildhall School Advancement division.

## **How can you update your preferences?**

You can change your communication preferences at any time via our website: [www.gsmd.ac.uk/update](http://www.gsmd.ac.uk/update). By completing or updating the form, you can give us permission to communicate with you via email, post and phone. We will record these preferences on our database and will use them to communicate with you.

You have a variety of rights in relation to your data. These are as follows:

- Where our use of your data requires consent, you may withdraw this consent at any time.
- Where we rely on our legitimate interest to process data, you may ask us to stop doing so.
- You may request a copy of the data we hold about you.
- You may update or amend the information we hold about you if it is wrong.
- You may ask us to change or stop the way in which we communicate with you or process data about you, for example if we are carrying out profiling (see above), you may ask us not to do so.
- You may object to the processing of your information for marketing purposes.
- If you are not satisfied with the way we have processed your data then you have the right to complain.

If you ask for us to stop processing your data entirely, we will delete the majority of your personal data from our database. We will only retain permanently the basic personal data that we need for institutional record and to ensure you are not added back on to our records in future. Please note, activities with a legal requirement such as processing Gift Aid donations may mean we cannot entirely stop processing your data.

Any significant changes to this Policy or to the way we treat your data will be communicated via the website or by contacting you directly.

If there is anything you are unclear about, please contact the Development Office. We will be happy to answer any queries you may have concerning this Notice or the way in which we process your personal data. If you are a donor or considering giving to the Guildhall School, you may also be interested in reading our [Donor Promise](#), which outlines our commitment to you as a supporter of the School.

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