

Old Whitgiftian Trustees Ltd, known as the Old Whitgiftian Association

PRIVACY POLICY

This Privacy Policy is owned by Old Whitgiftian Trustees Ltd, which is the corporate embodiment of the Old Whitgiftian Association. It explains the usage and protection of your personal data.

It is set out in the following sections.

1. IMPORTANT INFORMATION AND WHO WE ARE

2. TYPES OF PERSONAL DATA WE COLLECT ABOUT YOU

3. HOW IS YOUR PERSONAL DATA COLLECTED?

4. HOW WE USE YOUR PERSONAL DATA

5. DISCLOSURES OF YOUR PERSONAL DATA

6. DATA SECURITY

7. DATA RETENTION

8. YOUR LEGAL RIGHTS

9. CONTACT DETAILS

10. COMPLAINTS

11. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

12. THIRD PARTY LINKS

1. Important information and who we are

Privacy policy

This privacy policy gives you information about how we collect and use your personal data, including any data you may provide when you register with us and any data we already hold.

Controller

Old Whitgiftian Trustees Ltd, as the legal entity standing behind the Old Whitgiftian Association, is the data controller and is responsible for your personal data (also referred to as "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights (paragraph 8), please contact us using the information set out in the contact details section

(paragraph 9).

2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes your name or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes residential address, work address, email address and telephone numbers.
- **Profile Data** includes your membership status and that of any junior members for whom you have responsibility.
- **Usage Data** includes information about how you interact with and use our website and the OWA, for example events you have attended.
- **Marketing and Communications Data** includes your preferences in receiving communications from us and connected third parties such as Old Whitgiftian clubs and societies, including the Croham Road clubhouse, and schools within the John Whitgift Foundation.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our offering.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Your interactions with us. You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- use the OWA website
- attend OW events
- request information to be sent to you
- give us feedback or contact us.

Automated technologies or interactions. Our website may automatically collect data about your equipment, browsing actions and patterns. This personal data is collected by using cookies and other similar technologies.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below.

- Publicly available contact records and social networks, such as LinkedIn, Companies

House, X (formerly Twitter), Facebook etc.

- search information providers
- clubs and societies with a connection to the OWA, the Croham Road clubhouse or the John Whitgift Foundation.

4. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases for every type of processing:

- **Performance of a contract with you:** Where we need to perform a contract we have entered into with you, such as for the purposes of an organised event or a membership subscription.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example in furtherance of the OWA's objects and purposes. These interests include mailings and newsletters informing you about the OWA's activities and events, including fundraising events. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We do not rely on your consent in a general sense. We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis
To register you as a member, subscriber or participant.	(a) Identity (b) Contact	Legitimate interests in furtherance of the OWA's purposes, such as communications, newsletters and updates.
To process and deliver our services, including managing subscriptions and one-off payments.	(a) Identity (b) Contact (c) Marketing and Communications	Performance of a contract with you, for example putting on an event such as a luncheon for which a paid ticket is required. Necessary for our legitimate interests to maintain membership and

		subscription lists.
To manage our relationship with you which will include: (a) Invitations to events and calls for participation, including General Meetings of the OWA (b) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Necessary for our legitimate interests to maintain membership and subscription lists and the participation of our members.
To deliver relevant website content and online advertisements.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests to study how members use our services, to develop them and to inform our marketing strategy.
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data. This may include surveys of our membership.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests to carry out direct marketing, develop our services and extend the reach of the OWA.

Direct communications

When your personal data is first collected, you may be asked to indicate your preferences for receiving communications from the OWA.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which products, services and offers may be of interest to you so that we can then send you relevant marketing communications. An example would be a reunion luncheon planned for a specific grouping of past players defined by era, such as 1980-85.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask to stop sending you marketing communications at any time by logging into the website and following any instructions posted there, or by sending a communication to the contact details in the section below.

If you opt out of receiving marketing communications but remain a member, you will still receive service-related communications that are essential for administrative or membership purposes.

5. Disclosures of your personal data

We may share your personal data where necessary with the parties set out below for the purposes set out in the table above.

- The sports clubs operating at the Croham Road clubhouse.
- Whitgift School.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow these third parties to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to manage your membership, subscription or participation and for a reasonable period thereafter to allow for contact with the OWA to be maintained. In the case of alumni of Whitgift School this will be for life, subject to exercise of the right to be forgotten.

In some circumstances you can ask us to delete your data: see below for further information.

8. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see above for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent where we have relied on consent. This will not affect processing undertaken before you withdrew the consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, use the contact details below.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: OldWhitgiftianAssociationFiles@oldwhits.org
- Postal address: OWA Clubhouse, 23 Croham Manor Road, London CR2 7BG

10. Complaints

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). However, before doing so please make sure you have first made your complaint to us or asked us for clarification if there is something you do not understand.

11. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

12. Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.