



# Old Pauline Club

## **OLD PAULINE CLUB PRIVACY NOTICE**

### **INTRODUCTION**

This notice has been created to demonstrate our firm commitment to your privacy and is created to help you to understand **how** and **why** we collect personal information about you and what we do with that information.

In accordance with the General Data Protection Regulation (EU) 2016/679, the Old Pauline Club has completed a Legitimate Interest Assessment in respect of the retention and use of members' personal information that is held on our database. This means that the processing of your Personal Information is necessary for the proper functioning of the Old Pauline Club.

### **WHAT IS PERSONAL INFORMATION?**

Personal Information is information that identifies you as an individual and relates to you.

The information that the Old Pauline Club holds includes:

- Your contact details including your name, addresses, telephone numbers, e-mail addresses;
- Educational information e.g. years that you attended St Paul's School, which university or higher education establishment you attended and qualifications achieved;
- Occupation(s), qualifications, titles and honours gained after leaving education;
- Old Pauline and St Paul's School events that you have attended/supported;
- Sporting and cultural activities;
- Images of you engaging in Old Pauline activities;
- and other information that you or St Paul's School may have shared with us, or which is publicly available.

### **HOW WE COLLECT PERSONAL INFORMATION**

The Personal Information detailed above may be obtained from St Paul's School records when a pupil leaves the school, from information shared with us by Old Paulines when communicating with us about events that they have attended or may wish to attend, from Old Paulines who communicate to ensure that their records as held by the Old Pauline Club are current, or from open sources.

## **HOW WE USE PERSONAL INFORMATION**

The Old Pauline Club (OPC) is an independent autonomous Members Club for alumni of St Paul's School, London and for other non-Paulines as may be elected from time to time. The OPC exists to promote the general interests of St Paul's School and to provide opportunities for Old Paulines to meet and remain in contact with each other. In order to do so, the OPC may contact members by post, e-mail, social media and/or phone to inform them of events that are taking place under the aegis of either the school or the OPC.

## **SECURITY AND CONTROLLED DATA SHARING**

The data controller in respect of information held for the Old Pauline Club is St Paul's School. The Development Office of St Paul's School assists the Old Pauline Club with its aim of helping Old Pauline Club members remain in touch with other club members and of helping retain an interest in St Paul's School.

All Personal Information held by the Old Pauline Club may be shared with selected Old Pauline event organisers, St Paul's School and Club committee members, affiliated clubs, UK and overseas branches and associations of the Old Pauline Club for the legitimate interests of the Old Pauline Club.

The Old Pauline Club makes basic contact information available to members of the Old Pauline Club (except when a member specifically requests otherwise or where the Club does not hold data on particular individuals) through the publication of a Directory which is updated from time to time by Addendum.

We will **not** sell or share your information with any third parties for marketing purposes or commercial gain.

## **HOW LONG WE KEEP PERSONAL DATA**

The Old Pauline Club will retain Personal Data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

A limited and reasonable amount of information will be kept for archiving and/or research purposes, and even where a member has requested we no longer keep in touch with them, we will need to keep a record of the fact in order to fulfil their wishes (called a "suppression record").

## **YOUR RIGHTS**

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the Old Pauline Club, and in some cases, ask for it to be erased or amended or have it transferred to others, or for the Old Pauline Club to stop processing it (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, or who has some other objection to how their personal data is used, should put their request in writing to the contact address shown below.

The Old Pauline Club 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 one month in the case of requests for access to information).

The Old Pauline Club will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the Old Pauline Club may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

If an individual believes that the Old Pauline Club has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should notify the Old Pauline Club using the contact details at the foot of this notice. 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 before involving the regulator.

## **REQUESTS THAT CANNOT BE FULFILLED**

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to legal privilege.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data; for example a legal requirement, or where it falls within a legitimate interest identified in this privacy notice. All such requests will be considered on their own merits.

## **DATA ACCURACY AND SECURITY**

The Old Pauline Club will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the Old Pauline Club (per the contact details shown below) of any significant changes to important information, such as contact details, held about them.

Any individual has the right to request that any out of date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law); please see above for details of why the Old Pauline Club may need to process your data.

The Old Pauline Club will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and access to the systems on which personal data is held. All Old Pauline Club officers and staff

within the St Paul's School Development Office will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

## **CONTROL**

You are in control – if you have any queries or wish to restrict data processing or sharing or do not want to be contacted by the Old Pauline Club at all, please inform us using the contact details below. If there are specific Old Pauline Club / St Paul's Schools publications or activities from which you wish to opt-out, please let us know and we will ensure that your wishes are respected. You may change your contact preferences at any time. Minimal information is always retained to make sure that we do not contact you again inadvertently.

## **THIS POLICY**

We keep our privacy and data protection policy under review, and any changes we make will be published on our website and made available in hard copy on request.

## **RELEVANT LEGISLATION**

This Privacy Notice is covered by the relevant Data Protection Legislation, as follows:

- General Data Protection Regulation (EU 2016/679)
- The UK Data Protection Act 2018 (to follow)
- The Privacy and Electronic Communications Regulations 2011
- The Protection of Freedoms Act 2012

## **CONTACT DETAILS**

**The Old Pauline Club  
St Paul's School  
Lonsdale Road  
Barnes  
London, SW13 9JT**

**Telephone: 020 8746 5390**

**e-mail: [opcadmin@stpaulsschool.org.uk](mailto:opcadmin@stpaulsschool.org.uk)**

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