

The Guildhall School Trust

Privacy Policy

Last revised 2021

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The Guildhall School Trust is committed to upholding your privacy and taking care with the personal information that you may give to us. We will process your personal data in accordance with the General Data Protection Regulation (or GDPR for short).

This Privacy Policy explains how the Guildhall School Trust collects Personal Data, how we use it and how we keep it secure, the reasons for this processing and the lawful basis for it and your choices regarding use, access, correction and other rights in relation to your Personal Data. Please read this Privacy Policy carefully to understand how we will treat your Personal Data.

The Guildhall School Trust is a registered charity (registered under Charity No. 1082472 and Company Number 4041975) linked to the Guildhall School of Music & Drama (the “School”) with its principal office at Guildhall School of Music & Drama, Silk Street, Barbican, London, EC2Y 8DT (hereinafter the “Trust”, “we”, “us” and “our” for the purposes of this Privacy Policy).

For the purposes of this Privacy Policy we are the “Controller” (ICO Registration number ZA777217) of your Personal Data. This is because we are the organisation which determines why and how your Personal Data is processed. By “Personal Data”, we mean information which, either by itself or when combined with other information that we hold or which is available to us, can be used to identify you. It does not include data where the identity has been removed (anonymous data).

The Trust’s –Purposes are:

- To advance the education of students and prospective students of the School (including stage management and related production and design) and any other object considered by the Trustees to be beneficial to the promotion of music and drama (including stage management and related production and design) at the School; and
- To support any charitable purpose in which the School or any student may engage and which promotes music or drama (including stage management and related production and design)

The Trust fulfils its charitable purposes by making grants to the School and direct to students through the School.

To enable the Trust to comply with its Purposes, we need to know about the people who interact with us. The data we hold is used to acknowledge and financially process donations in accordance with our obligations to the Charity Commission and in compliance with HMRC rules regarding Gift Aid. The data enables us to respond to grant requests made by the School and to ensure that the grants made to the School and direct to students comply with any restrictions imposed by the donor. It also enables us

to nurture relationships with you by introducing you to School activities, events, fundraising appeals and ways you can get involved with the School.

Types of data we collect

Personal Data held and processed by the Trust may include:

- Biographical information including first name, maiden name, last name, username or similar identifier, marital status, title, gender, age, date of birth, age and gender;
- Contact details such as postal address, email address and telephone number;
- Your relationship and interaction with the Trust;
- A record of any correspondence with the Trust;
- Registration, booking details, tickets purchased and attendance at Trust fundraising events;
- Current areas of interests and hobbies where relevant;
- Information from publicly available sources such as media articles;
- Financial/ transaction information including bank account and payment card details, details about payments to and from you;
- Interest in leaving a legacy to the Trust, with details of any stipulations for use of the gift;
- Family and partner/spousal details, where relevant;
- Information you have chosen to share via online services such as LinkedIn or Just Giving; and
- Marketing and communications data eg. your preferences in receiving marketing from us and our third parties.

In addition;

If you are a student

We may also collect:

- Details of donations received, course and year of study, progress reports from tutors, thank you letters and other correspondence addressed to the donor;
- Ethnicity, country of origin, personal financial circumstances, family history and circumstances where relevant as a beneficiaries of scholarship support;

If you are a donor, volunteer or ambassador

We may also collect:

- Details of volunteering or ambassadorial activity you have undertaken on behalf of the Trust;
- Donation history, fundraising appeals and proposals;

- Date of gift, value & frequency of gift, payment method, gift aid declaration, timeframe for use of the gift, recipient name (if relevant), any other stipulations for use of the gift and reporting requirements; and
- Information about how you would like your donation to be credited, the timeframe for use of the gift and any other stipulations and reporting requirements including the recipient name (if relevant)

“**Special Categories of Personal Data**” means Personal Data which reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying you, data concerning your health or data concerning your sex life or sexual orientation.

There are instances when you will be asked to provide Special Category Personal Data. This information may include:

- Access requirements and dietary preferences that relate to an event that you are attending, so we can ensure that you have the best possible experience. For example if you have a disability and require a wheelchair this would reveal medical/ health data, or where you require Kosher food, this would reveal religion.
- Data that reveals your racial or ethnic origin may be relevant to grants made to the School and direct to students, so we can ensure that we comply with any restrictions imposed by the donor regarding ethnicity.

It is important that the Personal Data (which includes Special Category Personal Data) we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us. You can contact us using the details at the end of this Privacy Policy.

How do we collect this information?

We collect information about you from a number of sources:

- Directly from you, for instance when you make a donation, volunteer, make an enquiry or otherwise provide us with your Personal Data;
- If you book a ticket for a Trust fundraising event run by the School;
- Your data may be shared with us by the School, for example in order to process a donation, make a gift aid claim on your donation, or to inform Trustees of event attendees;
- The School may share your data with us as a recipient of scholarship support
- If you make a gift to the School Trust via the Charities Aid Foundation, British Schools & Universities Foundation, Benevity or any other third party service provider, your data will be passed on to us securely in order for the gift to be processed; or

- If an existing supporter or volunteer gives us your data and suggests we get in touch.

How do we use your Personal Data?

We use your Personal Data for a range of purposes, including:

- To respond and/or deal with your request or enquiry in relation to donations, gifts, legacies and volunteering;
- To manage our relationship with you, including your memberships;
- To communicate with you, including sending you information about events which we think may be of interest to you (where you have consented to receive such communications, or where it is otherwise lawful for us to do so);
- To respond to any feedback you send us, if you've asked us to;
- To contact you in order to provide you with information about our other events if you request it;
- To work in conjunction with the School to process donations, gifts, legacies, fundraising and event tickets booked on your behalf (please see the "Who do we share your Personal Data with" section below);
- To enable us to respond to grant requests from the School and to ensure donations made to the School are used for their intended purpose;
- To carry out administrative tasks such as collecting and processing payments;
- For legal, statutory and regulatory compliance and other good governance obligations, for example to fulfil our statutory duties to the Charity Commission, Companies House and the Fundraising Regulator in connection with, for example, fulfilling legacies and Gift Aid; and
- To perform due diligence research in order to ensure donation funds do not present an ethical or reputational risk to the Trust, thus fulfilling the requirements of the Trust and School's joint Gift Acceptance Policy.

What is the Lawful Basis for processing your Personal Data?

Under Data Protection Law, we have to have a legal basis on which we process your Personal Data. We rely on the following legal basis:

Consent

Some activities require your consent, for example where we collect your special category data or in order to send you information by email or phone on other opportunities to engage with the work of the Trust and the School (for instance sending your emails which promote a fundraising event at the School). If the law requires your consent to process data in a certain way, then we will obtain it before carrying out that activity.

Where consent is not required, we will process your Personal Data because either it is necessary for our legitimate interests, is necessary to enable us to perform the contract or it is necessary for us to comply with our legal obligations.

Necessary in order for us to comply with a contract

Other activities are carried out to fulfil a contract or agreement (for example, sending you tickets for an event you have booked, or processing donations and gifts on donations). If a contract or account is in place, then we will process your Personal Data on the basis that it is necessary to perform our contractual commitments to you.

Necessary for us to comply with our legal obligation

We process your Personal Data to comply with our legal or regulatory requirements including audit obligations to ensure donations and legacies have been applied to their intended use and in accordance with the Trust's obligations to the Charity Commission.

We rely on this lawful basis when processing any data subject rights requests in accordance with Data Protection Laws and for activities relating to the prevention, detection and investigation of any crime

In some circumstances the law requires us to disclose information to another party. Examples include a statutory annual audit, and the reclaim of tax on donations (to claim Gift Aid on donations, we are required to provide HMRC with the name and postcode of the donor and the date(s) and amount(s) of any such donation).

Legitimate interests

We may also process your personal data because we have a legitimate need to, for the following purposes:

- for management and audit of our charity's operations to ensure that they comply with all applicable laws, and good business practices; sharing your Personal Data with our service providers, law enforcement, regulatory, and/or other government organisations;
- to respond to grant requests made by the School and to ensure that grants made to the School and direct to students comply with any restrictions imposed by the donor;
- managing our relationship with you in terms of keeping our records updated;
- in connection with processing conducted via IT systems, network providers, data storage and backup providers;
- where we share personal data with professional services providers (such as lawyers, accountants, auditors, consultants);

- to send you further marketing information by post on opportunities to engage with the work of the Trust and the School;
- disclosures to third parties, (unless the disclosure is to comply with our legal obligations in which case the lawful basis for processing will be legal obligations; or your consent for the disclosure is necessary in accordance with applicable data privacy law, in which case the lawful basis for processing will be consent).
- where a current supporter suggests we get in touch with you as you have an interest in the work of the Trust.

The table at the end of this policy summarises the purposes for which we will use your personal data and our lawful basis for processing.

Who do we share your Personal Data with?

The Trust 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. We will never sell your information to a third party.

Such disclosures will be made to the following categories of recipients:

- government departments, law enforcement agencies, regulators;
- third party service providers, such as IT systems, network and back-up and storage; providers, and other similar service providers;
- professional advisors, such as lawyers, accountants, auditors and/or consultants; and
- a host, alumnus or another person who has a volunteer role in the School

We may need to share your data with the School in the following instances:

- when it relates to the processing, request or acceptance of a donation;
- when it relates to processing direct to students awards.
- to enable the School to communicate with the Trust on the use and impact of donations on the School and its students;
- when it relates to fulfilling fundraising event tickets, grants and legacies received by the Trust;
- to manage & nurture relationships with donors, prospects, Executors/family members, trustees;
- to organise & administer events & communicate to participants about logistics & arrangements;
- to enable consideration of appropriate prospects for fundraising purposes;
- to send promotional material / marketing to donors/ prospects/ fundraising event ticket holders;
- to fulfil the terms of Guildhall Circle membership and other contracts;

- to place Personal Data onto the Advancement Database, which is held by the School;
- and
- to enable disclosures to HMRC in order to claim Gift Aid on a gift.

How long do we keep your Personal 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, which provides protections for individuals with regard to the processing of their Personal Data. We will only hold data relevant to carry out the work of the Trust, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

We will only retain permanently the basic Personal Data that is needed for institutional records and to ensure you are not added back into the 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. Please note that it may not always be possible to completely remove or delete all of your personal information from our databases because of back-ups and other technical reasons. Where this is the case, we will take steps to ensure that your Personal Data is suppressed in order to render it unusable.

How do we keep your Personal Data safe?

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

All Personal Data that we hold is stored on the School's Advancement database on the Trust's behalf, with appropriate security measures in place to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Where we refer to the 'Advancement database', we are referring to the database on which all personal data used by the Trust is stored. Any staff with access to the information held on the Advancement database have completed the City of London data protection training and further specialist database training with the School's data team. The Advancement database can only be accessed by people who need it to do their job. 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 breach of Personal Data and will notify you and any applicable regulator of a breach where we are legally required to do so.

Our marketing activities

Where you have submitted your details at an event, or otherwise provided them to us so that we can provide you with further information about our events/ services, we will only use the Personal Data you provide us for those purposes. Such communication will be made using the contact information provided (i.e. if you provide us your telephone number, we will call you, if you provide us your e-mail address, we will e-mail you), unless you have indicated a preferred method of contact, in which case we will follow that method of communication. Where we e-mail you with information about the work of the Trust and the School, we will provide you with a clear way to opt-out of receiving any further communications.

Please note, marketing communications are not the same as “information only”, or “service” communications and so consents are not usually required for us to communicate with you about administering your gift, an event booking, or any Trust opportunities you have enquired about using contact details you have provided for this purpose.

How can you update your preferences?

You can change your communication preferences at any time via the School’s website 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. These preferences will be recorded on the Advancement 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, correct 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;
- 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, the majority of your Personal Data will be deleted from the Advancement 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 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.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

If there is anything you are unclear about, please contact the Company Secretary, who will be happy to answer any queries you may have concerning this Notice or the way in which we process your personal data.

Tel: +44 (0)20 7382 7157

CompanySecretary@gsmd.ac.uk

The Guildhall School Trust, Guildhall School, Silk Street, Barbican, London EC2Y 8DT.

Registered Charity 1082472

Summary of the purposes for which we will use your personal data and our lawful basis for processing

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To respond and/or deal with your request or enquiry in relation to donations, gifts, legacies and volunteering;	Identity Contact Consent	<ul style="list-style-type: none"> • Consent in order to process your data where it is needed • Necessary to comply with a legal obligation • Necessary to comply with a contract with you • Necessary for our legitimate interests
<p>To manage our relationship with you, which will include:</p> <ul style="list-style-type: none"> a) Communications, including events b) Respond to feedback you send us c) Working with the School to process donations, gifts, legacies, fundraising and event tickets d) To respond to grant requests from the School and ensure donations are used for their intended purpose e) To carry our administrative tasks such as collecting and processing payments 	Identity Contact Marketing and Communications	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests
For legal, statutory and regulatory compliance (statutory duties to the Charity Commission; Companies House; HMRC and the Fundraising Regulator)	Identity Contact	<ul style="list-style-type: none"> • Necessary to comply with a legal obligation
To perform due diligence research	Identity Contact	<ul style="list-style-type: none"> • Necessary to comply with a legal obligation