



PRIVACY NOTICE FOR DONORS AND PROSPECTIVE SUPPORTERS

INTRODUCTION

Eton College (the College) is a registered charity. Its official name is The Kynge's College of our Ladye of Eton beside Windesore, and its registered charity number is 1139086.

For the purposes of any applicable data protection laws in England and Wales, including the Data Protection Act 2018, the UK General Data Protection Regulations and General Data Protection Regulation EU 2016/679, the College is the data controller of your personal data. The College has appointed a Data Protection Lead (Mr M Brooks, Clerk and Legal Advisor to the Provost & Fellows) who can be contacted via email at dataprotection@etoncollege.org.uk should you have any concerns.

This Privacy Notice is intended to provide information about how the College will collect, use and hold (or "process") personal data for donors, prospective donors and those who support the College in its charitable endeavours. This information is provided because data protection law gives individuals rights to understand how their data is processed and what their rights are in respect of the data held.

The College will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be notified via the College website and to you directly, as far as is reasonably practicable.

This Privacy Notice was last updated on 22nd April 2025.

TYPES OF PERSONAL DATA PROCESSED BY THE COLLEGE

The personal data the College processes takes different forms – it may be factual information, expressions of opinion, images or other recorded information etc.

Examples include:

- **Contact data** such as name, title, date of birth, addresses, telephone numbers, e-mail addresses, family details.
- **Financial data** such as bank details, billing address, gift aid details, direct debit instructions and other financial information, and any source of funds and/or anti-money laundering information we are required to collect by law.
- **Communications data** such as emails, notes of conversations or recordings, contact preferences.
- **Technical data** such as IP address, login data, browser type and version, time zone setting and locations, operating system and platform you use to access the website.
- **Usage data** such as information about your use of the service including the URL, viewing data and time, pages viewed or words searched for or length of visit.
- **Donations data** such as details about donations you have made in the past, links to the College, ability and preference to make future donations.
- **Marketing data** such as your marketing preferences, images or opinions.
- **Publicly available data** such as residential location, wealth and assets, family, career, donation to other organisations (where they are made publicly available) education, hobbies and interests.

HOW THE COLLEGE COLLECTS DATA

Generally, the College receives personal data from the individual directly. This may be via a form, or simply in the ordinary course of interaction or communication. Additionally, as you interact with our

website or social media platforms, we may automatically collect technical and usage data by using cookies and other similar data. In some cases, personal data will be supplied by third parties, including the Old Etonians Association, or publicly available sources (such as information on your previous donations, lifestyle, family life, marketing data or contact information).

Profiling and wealth screening:

The College uses a number of profiling and wealth screening techniques to collect, manage and store personal data in order to provide a more bespoke experience for members of the College community and potential donors. Profiling enables the College to better understand its audience in order to only make appropriate requests to donors and prospective donors. When building the profile, the College, or carefully selected companies operating on its behalf, may analyse geographic, demographic and other publicly available information to better understand the interests and preferences of donors and potential donors.

LEGAL BASES FOR THE COLLECTION OF DATA

We will only store or process your personal data when the law allows us to. Under the UK General Data Protection Regulation, the lawful bases we most commonly rely on are:

- When you have given us your **consent**.
- Where it is necessary for our **legitimate interests** (or those of a third party).
- Where it is a **legal** requirement.

The College considers that the following uses fall within the category of legitimate interests:

- To promote, manage and administer our charitable provision.
- To raise funds, grow the charity and inform our marketing strategy.
- To deliver relevant website content and marketing messages to you.
- To improve our online presence by providing a tailored experience across the site and social media platforms.
- To build and maintain relationships with donors, prospective supporters and alumni, including by direct marketing or fundraising activities.
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests.
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law.
- For internal record keeping processes, including the management of any feedback or complaints.
- To make use of photographic images in College publications, on the College website and (where appropriate) on the College's social media channels.

Before seeking or accepting any major donations we are legally required to conduct specific due diligence checks, including reviewing publicly available personal data relating to criminal convictions or offences.

HOW LONG THE COLLEGE KEEPS PERSONAL DATA FOR

The College will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

If you have any specific queries about how the College's retention policy is applied or wish to request that personal data you no longer believe to be relevant is considered for erasure, please contact the College's Data Protection Lead on dataprotection@etoncollege.org.uk or via post at: Data Protection Lead, Eton College, Windsor, Berkshire, SL4 6DW. However, please bear in mind that the College may have lawful and necessary reasons to hold on to some personal data even following such a request.

A limited and reasonable amount of information will also be kept for archiving purposes, and even where you have requested that the College no longer keeps in touch with you, it will need to keep a record of that fact in order to fulfil your wishes (called a "suppression record").

DATA ACCURACY AND SECURITY

We take the security of your information very seriously. We use appropriate procedures and technical security measures (including encryption and archiving techniques) to safeguard your information across our computer systems, networks and websites, along with organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to College systems. The College does not transfer personal data outside of the European Economic Area unless it is satisfied that the personal data will be afforded an equivalent level of protection.

The College may share data with the Old Etonians Association and other individuals who are assisting the College in its fundraising activities as appropriate, but only where data sharing agreements are in place or consent has been issued by the relevant individual.

We will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. However, you are required to notify the College of any significant changes to important information held about you, such as contact details etc. via the online systems or in writing to the Development Office at Eton College.

YOUR RIGHTS

You have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you.
- to require us to correct the personal data we hold about you if it is incorrect.
- to require us (in certain circumstances) to erase your personal data.
- to request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal).
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller.
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse to facilitate the exercise of your rights where exceptions apply. The College will endeavour to respond to any requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month, but fulfilling more complex or multiple requests, e.g. those involving third party information, may take 1-2 months longer).

QUERIES AND COMPLAINTS

If you have any queries about this Privacy Notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact the College's Data Protection Lead by:

- Email - dataprotection@etoncollege.org.uk
- Telephone - 01753 370542
- Post - Data Protection Lead, Eton College, Windsor, Berkshire, SL4 6DW

You can also find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at www.ico.org.uk.

If you are not satisfied with how we process your personal data, or how we deal with a complaint, you can make a referral to the Information Commissioner's Office (ICO) at www.ico.org.uk. However, the ICO does recommend you seek to resolve any issues with us initially prior to any referral to them.