



FARLEIGH

2.12 FARLEIGH CONNECTED PRIVACY POLICY

This policy applies to:	Pupils / Staff / Visitors / All Prep / Pre-Prep / Kindergarten Day / Boarding
Person(s) responsible:	Information Management Officer (DFO)
Last updated:	December 2025 <i>(light review to reflect introduction of ToucanTech)</i>
Review period:	24 months (or sooner if regulations change)
Next review:	June 2027
This policy should be read in conjunction with:	2.08 Data Protection 2.09 Privacy Notice for Parents and Pupils 2.10 Privacy Notice for Staff, Volunteers, Governors and Job Applicants

WHO WE ARE

‘Farleigh Connected’ is the umbrella organisation which cares for the members of the Farleigh family throughout the world with the aim of creating and fostering good relations between the School and all interested parties, with the objective of building and maintaining support for, and pride in, all that the School seeks to achieve. The Farleigh Society (referred to in this policy as ‘the Society’) is a key constituent of this overall organisation, focussed on supporting the alumni of the School in helping them keep in touch and organise reunions. The Society’s address is The Farleigh Society, Red Rice, Andover, Hampshire, SP11 7PW.

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how the School (on behalf of Farleigh Connected) and the Society will use (or “process”) personal data about individuals including:

- Alumni from Farleigh School
- Honorary Farleigh Society members
- Current and Past Parents, Carers or Guardians (referred to in this policy as “parents”)
- Farleigh School Staff (past and present)
- Friends, supporters and donors of Farleigh School

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Farleigh’s, parents, staff and alumni are all encouraged to read this Privacy Notice and understand the School’s and the Society’s obligations to the entire community.

This **Privacy Notice** applies alongside any other information the School or Society may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This **Privacy Notice also** applies in addition to the Society’s agreement to the School’s other relevant terms and conditions and policies, including:

- any contract between the School and its staff or the parents of pupils;
- the School’s policy on taking, storing and using images of children;

- the School's Camera Security System Policy;
- the School's retention of records policy;
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the School's ICT policies, including its Acceptable Use Policy and Remote Working Policy.

Anyone who works for, or acts on behalf of, the School or the Society (including staff, members, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice which also provides further information about how personal data about those individuals will be used.

RESPONSIBILITY FOR DATA PROTECTION

Farleigh School's Information Management Officer (IMO) (the Director of Finance and Operations (DFO)) will deal with all your requests and enquiries concerning the School and/or the Society's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

WHY THE SCHOOL AND/OR SOCIETY NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to its membership, the School and/or the Society needs to process a wide range of personal data about members as part of its daily operation.

Other uses of personal data will be made in accordance with the School's or the Society's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL AND THE SOCIETY

This will include by way of example:

- Names, addresses, telephone numbers, e-mail addresses and other contact details;
- Bank details and other financial information, e.g. about members and other people who pay for tickets to School and Society events and, potentially, for merchandise to the Society; this may include a record of payments made via the website (but we do not store your credit/ debit card details as these are processed securely externally by a third-party payment provider) which could include event tickets, shop purchases or online donations made to the School and/or Society.
- Family links to Farleigh including the years that you or your child(ren) attended the School.
- Career information (including higher education and work details) for the furtherance of the School's or the Society's careers network operation and the organisation of our graduate event programme;
- Correspondence with members including the organisation of School and/or Society events;
- Images of members (and occasionally other individuals) engaging in School and/or Society activities.
- Participation in our events, emails, competitions, surveys and other activities.
- Geo-location data (your geographical location based on your IP address when using the School's websites).
- Consent options and communication preferences.
- Content (such as announcements, stories, photos, documents, comments, events, jobs) that you post on the School's websites or provide to us by other means.
- Messages that you send to other community members via the direct messaging system when logged in to the School's websites.

HOW THE SCHOOL AND/OR SOCIETY COLLECTS DATA

Generally, the School or the Society receives personal data from the individual directly in the form of memberships. This may be via a form, or simply in the ordinary course of interaction or communication. It will also include where the School (or the Society) has received information from the individual via the ToucanTech online platform.

However, in some cases personal data will be supplied by third parties, for example another School, or other professionals or authorities working with that individual; or collected from publicly available resources.

HOW WE USE YOUR INFORMATION

- Providing you with the information or updates that you have asked for.
- Sending you communications (with your consent if required) that may be of interest, including invites to events, newsletters and fundraising campaigns.
- Delivering our obligations under any contract between us.
- Seeking your views on the services or activities we carry out, so that we can make improvements.
- Updating our database records and ensuring we know how you prefer to be contacted.
- Analysing your engagement with our website and other content to help us improve our services for you.
- Running our mentoring programme/club activities/reunion events/sports fixtures.
- Displaying your name as a list of potential 'matches' when you (or someone with similar details) signs-up for an event, makes a donation or joins the online community and the system is trying to match your information to an existing record stored in our database.

UPDATING YOUR CONSENT PREFERENCES (ToucanTech)

- If you have an online profile on the ToucanTech website you can update your consent options by logging-in and clicking on "My Settings" in your profile. Scroll down to find your 'Consent options' where you will see a list of consents and the options "opt-in", "opt-out" and "unspecified".
- Via 'My Settings' you can also choose to hide your profile from search engines, limit access to your profile so that it's only viewable to your connections and adjust some of the automatic notifications that you receive from this website. Please note that your name (but not full profile) may appear in various places around the community website, such as a 'Recent Joiners' box and in 'Search' results irrespective of the privacy settings you have selected.
- To discuss consent preferences please contact: farleighconnected@farleighschool.com but you should note that if:
 - We are using consent as our legal basis for processing your data, we must have an explicit "opt-in" from you for this specific type of processing.
 - We are using legitimate interests as our legal basis for processing your data, we will process your data responsibly in a way that you would reasonably expect, and you can opt-out at any stage.
 - You click 'unsubscribe' at the bottom of one of our emails sent you will be automatically opted-out of these types of email communications in the future.

HOW WE KEEP YOUR INFORMATION SAFE (ToucanTech)

- We understand the importance of keeping your personal information secure and take appropriate steps to safeguard it.

- Your data is stored on a dedicated, secure cloud server hosted by Amazon Web Services (AWS) in the EU and managed by our website provider, ToucanTech. Industry standard firewalls, anti-virus, encryption and back-up methods are in place, as well as strict data handling protocols.
- We always ensure only authorised persons have access to your information, which means only our approved employees and contractors, and that everyone who has access is appropriately trained in data management.
- If you have an online profile for this website you are responsible for keeping your login details (email and password) confidential and we ask that you do not share your password with anyone.
- No data transmission over the internet can be guaranteed to be completely secure. So, whilst we strive to safeguard your information, we cannot guarantee the security of any information you provide online and you do this at your own risk.

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL AND/OR SOCIETY SHARES IT WITH

The School and the Society will need to share personal information relating to its community with third parties, such as:

- Farleigh School to the Society (and vice versa);
- Mailing Houses used by the School and/or the Society for bulk mailings (for example MailChimp);
- Events companies if we run (or book) an event in conjunction with them (we will let you know how your data is used when you book with them); and
- Web hosting, email hosting, analytics and search engine providers that enable us to run our community database and improve our website and its use (for example, ToucanTech).

For the most part, personal data collected by the Society will remain within the Society, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

When acting independently of the School, the Society (and Farleigh Connected) abide by the School's Safeguarding Policy and will record and report incidents and concerns that arise or are reported to it to a Designated Safeguarding Lead.

Finally, some of the School's and some of the Society's processing activity is carried out on its behalf by third parties, such as ICT systems, web developers or cloud storage providers.

We select our third-party service providers with care and this is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's and/or Society's specific directions. We provide only the information that is necessary to provide the service and we will have an agreement in place that requires them to operate with the same care over data protection as we do.

USE OF AGGREGATED DATA (ToucanTech)

Where data can be aggregated and anonymised, our website provider (ToucanTech) might use this for research purposes without restriction. For example, they may monitor traffic patterns, site usage, response rates and data trends to help make improvement to the website software. They are entitled to do this because the resulting data will not personally identify you and will therefore no longer constitute personal data for the purposes of data protection laws.

HOW LONG WE KEEP PERSONAL DATA

The School and the Society will retain personal data in accordance with the records retention policy of the School. In the case of Alumni, this would be permanent if kept for a legitimate and lawful reason and unless requested otherwise.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the IMO.

A limited and reasonable amount of information will be kept for archiving purposes: for example, even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a “suppression record”)

KEEPING IN TOUCH AND SUPPORTING THE SOCIETY AND THE SCHOOL

The Society will use the contact details of alumni and other members of the Farleigh Connected community to keep them updated about the activities of the Society, Farleigh Connected and the School more generally including the organisation of Society events and sending updates and newsletters, by email, by post and by making contact by telephone and on social media.

Unless the relevant individual objects and informs the School of this in writing, the School may also:

- Contact parents and/or alumni by post, e-mail, social media and telephone to promote and raise funds for the School;
- Collect information from publicly available sources about parents' and former pupils' occupations and activities, to maximise the School's fundraising potential. We do this carefully and do not use solely automated processing or profiling, to respect individuals' rights under data protection law.

Should you wish to limit or object to any such use, or would like further information about them, please contact the School and/or the Society in writing. You always have the right to withdraw consent, where given, or otherwise object to direct contact. However, the School and/or Society is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

YOUR RIGHTS

Rights of access, etc

- Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School and/or the Society, and in some cases ask for it to be erased or amended or have it transferred to others, or for the and/or the Society to stop processing it – but 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, should put their request in writing to the IMO.
- The School and/or the Society 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 School and/or the Society 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 School and/or the Society may ask you to reconsider or require a proportionate fee (but only where Data Protection Law allows it).

Requests that cannot be fulfilled

- You should be aware 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 (for example legal advice given to or sought by the School and/or the Society, or documents prepared in connection with a legal action).
- You may have heard of the “right to be forgotten”. However, we will sometimes have compelling reasons to refuse specific requests to amend or stop processing personal details; for example a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such request will be considered on their own merits.

Consent

- Where the School and/or the Society is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Please be aware however that the School and/or the Society may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.
- That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or because a purchase of goods, services or membership of an organisation has been requested).

Whose rights?

- The rights under Data Protection Law belong to the individual to whom the data relates.

DATA ACCURACY AND SECURITY

The School and the Society 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 School and/or the Society either by post or email at the addresses below, of any changes to information held about them.

An individual has the right to request that any inaccurate or out-of-date information about them is erased or corrected (subject to certain exemptions and limitations under Act): please see above.

The School and the Society will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to systems. All Society staff will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the School’s Information Management Officer who can be contacted by email at bursar@farleighschool.com or by telephone 01264 712823.

If an individual believes that the Society has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School’s complaints policy and should also notify the School’s Information Management Officer. The individual involved 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 with the Society before involving the regulator.