



Royal Conservatoire  
*of* Scotland

# Privacy Notice: FUNDRAISING & DONORS

Version 3, June 2023

## RCS PRIVACY NOTICE FOR FUNDRAISING AND COMMUNICATIONS WITH DONORS

At the Royal Conservatoire of Scotland (RCS), your privacy is important to us. This privacy notice outlines the information we hold and how we use it to provide services to our donors. It also explains how we look after your data, why we process your data and how your data is used, stored and protected. This privacy notice will also advise you how to access your data, make changes and stay informed.

### WHO WE ARE

The Royal Conservatoire of Scotland is a Higher Education Institution (HEI) and a performing arts venue located in Scotland. As a data controller, the RCS will process your personal data to provide you with RCS services and to undertake its responsibilities as a HEI in Scotland. Our Data Protection Officer can be contacted at [dataprotection@rcs.ac.uk](mailto:dataprotection@rcs.ac.uk)

### HOW WE LOOK AFTER YOUR DATA

We will comply with all relevant data protection legislation which means your personal data will be:

1. Processed lawfully, fairly and in a transparent manner
2. Collected for specific, explicit and legitimate purposes
3. Adequate, relevant and limited to what is necessary
4. Accurate and up to date
5. Kept in a form which could identify individuals for no longer than is necessary and securely deleted thereafter
6. Processed in a manner that ensures appropriate security of the personal data

### HOW WE COLLECT YOUR DATA

We collect personal information about you in order to create and maintain adequate records in relation to your interactions with the RCS. We will collect and process personal information directly from you, or from an authorised third party.

### HOW YOUR DATA IS USED

Your data is used by us for a number of interdependent purposes. Each of these purposes has a lawful basis for using your data and these are as follows:

<b>Purpose 1: Donation processing and follow-up</b>	
Description of processing	<p>If you have an existing relationship with the RCS and you kindly choose to donate to RCS, then your data will be used to process your donation, including follow-up communication with you.</p> <p>Your information will be used to process your donation and/or application to the RCS Company of Donors and then stored in our relationship management database. This will include the details you provided when making the donation, such as your name,</p>

	<p>contact information, organisation, position, images/photos, and the details of your donation.</p> <p>We will write to you to thank you for your donation. Sometimes your donation will be added to a particular fund, student scholarship or bursary and we will contact you over time to inform you of the fund and the good that it does. You can opt-out of receiving further communication about your donation by contacting <a href="mailto:development@rcs.ac.uk">development@rcs.ac.uk</a></p> <p>If you choose to donate anonymously we will not process any personal information.</p> <p>RCS will keep necessary details of the payment for auditing or other regulatory purposes.</p>
Lawful Basis	<p><b>Legitimate Interest</b></p> <p>If you have an existing relationship with us we will use the existing personal data you've given us to process your donation and to update our records about your gift.</p> <p><b>Legal obligation</b></p> <p>In addition to the initial payment processing, RCS may be required to keep some of your personal data for accounting and audit purposes as required by relevant laws.</p>

<b>Purpose 2: Gift Aid</b>	
Description of processing	<p>Many donors choose to Gift Aid their donation. If you consent to Gift Aid your donation, your name, address, and postcode will be used to process your donation and submitted to HMRC to claim Gift Aid.</p> <p>Your information (including your Gift Aid declaration) will also be stored in our database and shared with the RCS finance department.</p>
Lawful Basis	<p><b>Legal obligation &amp; Consent</b></p> <p>We will ask you about Gift Aid at the point of donation or as soon as possible afterwards. When you give your consent to Gift Aid a donation, the RCS finance team will process your personal data to claim the Gift Aid from HMRC. Keeping a record of the donation date, payment details and purpose of donation is necessary for the RCS to comply with financial governance and audit obligations. If you Gift Aid your donations, we are required to share details with HMRC.</p>

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<b>Purpose 3: RCS current and prospective donors events, invites and feedback</b>	
Description of processing	The RCS will invite current and prospective RCS donors to attend events. Your information will be processed to invite you to events, manage the registration and attendance of the event, ensure adequate health, safety and security measures are in place, as well as providing access to RCS facilities and services, such as wi-fi. You may also be contacted to ask for feedback on events.
Lawful Basis	<b>Legitimate interest</b> The RCS has a legitimate interest to invite current and prospective donors and interested persons to events that showcase the RCS. The purpose of these events is to create a new or to develop an existing relationship. Gathering feedback is essential to understanding the needs and wants of these individuals and providing future events and communications of interest.

<b>Purpose 4: RCS News Marketing via e-mail</b>	
Description of processing	We will send current and prospective donors marketing e-mails which may include newsletters, publications, event guides and information & updates about the RCS. This may also include alumni engagement news, services available to you and similar information that we think may be of interest to you. Digital tools may be used to monitor the impact of our communications, such as email tracking to record when an email is opened.
Lawful Basis	<b>Legitimate interest</b> The RCS has a legitimate interest to keep current and prospective donors informed about RCS life and upcoming events. The purpose of processing this information is to ensure donors have the opportunity to take part in RCS life where possible and be aware of the successes of our students and staff.  If you no longer wish to receive these communications you can use the 'unsubscribe' link in your marketing email, or inform the Development department by email at <a href="mailto:development@rcs.ac.uk">development@rcs.ac.uk</a>

<b>Purpose 5: RCS News Marketing via telephone, postal mail</b>	
Description of processing	We may contact current and prospective donors via the telephone or postal mail with RCS news, event information, RCS publications, and other communications that we think may be of interest to you.
Lawful Basis	<p><b>Legitimate interests</b></p> <p>The RCS has a legitimate interest to be able to communicate with its donors by phone or through the post. This reflects the oftentimes long-term nature of the relationship between the institution and its donors.</p> <p>We will not phone you if you are registered with the Telephone Preference Service (TPS).</p> <p>If you no longer want to receive marketing communications from us you can unsubscribe using the link in the marketing email, or by emailing the Development department via <a href="mailto:development@rcs.ac.uk">development@rcs.ac.uk</a></p>

<b>Purpose 6: Donations/Fundraising campaigns via e-mail</b>	
Description of processing	<p>We may send current and prospective donors e-mails that are specific to fundraising campaigns, tailored proposals and appeals. This could include requests for donations for specific scholarships or donation schemes such as the RCS Company of Donors. Additionally, we may contact current and prospective donors to ask them to take part in research about donation or funding.</p> <p>If you no longer want to receive marketing communications from us you can unsubscribe using the link in the marketing email, or by emailing the Development department via <a href="mailto:development@rcs.ac.uk">development@rcs.ac.uk</a></p>
Lawful Basis	<p><b>Consent</b></p> <p>As a current or prospective donor, you can provide your consent to receive communications regarding donations and fundraising in person, in writing or by opting in on a form.</p> <p>We may contact donors within five years of the last donation or last engagement with the RCS. Where the donor has not</p>

	<p>interacted with the RCS for a period of five years, we will remove them from the donation/funding contact list.</p> <p>You can withdraw consent at any time for this processing by informing the Development department by email at <a href="mailto:development@rcs.ac.uk">development@rcs.ac.uk</a></p>
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<b>Purpose 7: Donations/Fundraising campaigns via telephone, postal mail</b>	
Description of processing	<p>We may contact current and prospective donors via the telephone or postal mail with specific reference to fundraising campaigns, tailored proposals and appeals. This could include requests for donations for specific scholarships or donation schemes such as the RCS Company of Donors.</p> <p>Contact by phone or postal mail reflects the oftentimes long-term nature of the relationship between the institution and its donors, and the sporadic nature of some fundraising work, like a major fundraising appeal.</p> <p>Additionally, we may contact current and prospective donors to ask them to take part in research about donation or funding. You can opt-out of receiving these communications, now or at any point in the future by updating your communication preferences on a page we will send to you, or by contacting <a href="mailto:development@rcs.ac.uk">development@rcs.ac.uk</a></p>
Lawful Basis	<p><b>Consent</b></p> <p>As a current or prospective donor, you can provide your consent to receive communications regarding donations and fundraising in person, in writing or by opting in on a form.</p> <p>We may contact donors within five years of the last donation or last engagement with the RCS. Where the donor has not interacted with the RCS for a period of five years, we will remove them from the donation/funding contact list.</p> <p>We will not phone you if you are registered with the TPS.</p>

<b>Purpose 8: Updating your details</b>
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Description of processing	<p>We value the long-standing relationship that many donors have with the RCS. As a donor we expect that you will have an interest in the RCS and its work and that you may wish to continue engaging with the RCS in the long term.</p> <p>Our donors can tell us about any changes to the personal data we hold about them via <a href="mailto:development@rcs.ac.uk">development@rcs.ac.uk</a>. To ensure that we have up-to-date information about our donors we may ask our donors to confirm their personal data, typically their contact details, as well as removing duplicate records and retiring the records of members with no updated contact details or who have deceased.</p>
Lawful Basis	<p><b>Legitimate interests</b></p> <p>The RCS has a legitimate interest to keep its donor information up to date, to be able to keep in touch with donors over time. This reflects the long-term the relationship between the institution and its donors. Cleaning up the data we hold also reduces the risk of sending unwanted or misdirected communications that may cause inconvenience or distress.</p> <p>If you need to update your details, you can do so at any time by e-mailing <a href="mailto:development@rcs.ac.uk">development@rcs.ac.uk</a></p>

### **Purpose 9: Donor research and analysis**

Description of processing	<p>Our donors play a key part in the work of the RCS. To support meaningful and effective engagement with our donors, and to help us provide a targeted and effective approach, we may gather relevant information about individual donors, both from records of your interaction with us, or from other sources.</p> <p>For a smaller number of our donors, we may carry out research using information in our own database (such as ticket buying and their history of giving to the RCS) so that we may better understand their engagement with RCS and their potential interest in financially supporting us further. We may also seek additional information from third party sources, such as the following websites:</p> <ul style="list-style-type: none"> <li>• Google and other search engines</li> <li>• Office of the Scottish Charity Regulator</li> <li>• Public register of companies</li> <li>• Companies House</li> <li>• LinkedIn</li> </ul>
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	<ul style="list-style-type: none"> <li>• Websites of other arts organisations and charities</li> <li>• Company websites, newspaper archives, and housing market websites</li> <li>• UK Electoral Roll and Directory Enquiries</li> </ul> <p>We may gather information from different sources to build up a profile about you that will help to give us:</p> <ul style="list-style-type: none"> <li>• a better understanding of your known or likely priorities and preferences, for example to tailor marketing communications or invitations to events that might interest you</li> <li>• an understanding of your perceived level of engagement and get a sense of your propensity to donate</li> </ul> <p>We may undertake research and analysis using trusted third-party partners, to support some of this work. You will always have the right to opt out of such processing. Information on how to do so is in the Your Rights section below.</p>
Lawful Basis	<p><b>Legitimate interests</b></p> <p>RCS considers that undertaking research into, and analysis of, its donors is in its legitimate interests. The RCS was founded on philanthropy and our donor support continues to make an enormous impact on student success.</p> <p>Donor research and analysis allows RCS to build up an understanding of your level of engagement and predict your propensity to donate. This allows RCS to conduct its legitimate fundraising activity in a much more effective fashion which not only improves the donor experience, but also improves what RCS can offer its students.</p>

### Purpose 10: Wealth screening

Description of processing	<p>We want to ensure our development activities and engagement with our donors are as targeted and effective as possible. As part of this approach, we may undertake donor research that could include wealth screening to learn more about the potential capacity of our donors to give.</p> <p>Wealth screening is a way the RCS can assess the assets of donors and to learn if they have the capability and are in the position to make a significant gift. Screening can also help us predict the propensity of our donors to donate.</p> <p>Wealth screening involves RCS, or a trusted third party on RCS's behalf, researching you and undertaking manual or automated analysis of information gathered about you to predict your</p>
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	<p>financial means, predict your propensity to donate and predict amounts you may be able to give. The research will, or may, include gathering information about you from any publicly accessible source.</p> <p>RCS may then use the outcomes of its wealth screening and other research and analysis to better target our communication and engagement work, and to build and tailor philanthropic opportunities that best suit our understanding of your interests. We endeavour to make sure that any research and data collection we do is only sourced from publicly available sources where an individual would, in our view, have reasonable expectation that their information may be freely read by the public or the individual has freely made information available in respect of their business and philanthropic interests. We do not seek to gather information where it is reasonable to conclude that the individual has made an effort to keep that information private, such as information on family life or personal relationships that exist outside the business world.</p>
<p>Lawful Basis</p>	<p><b>Legitimate interests</b> RCS considers undertaking wealth screening research into its donors is in its legitimate interest.</p> <p>The activity allows RCS to understand, in broad terms, the respective financial means of its donors. This allows RCS to target its fundraising activity. For example, wealthier individuals may be presented with philanthropic opportunities associated with large, or bespoke, fundraising projects aligned with their interests and giving capacity. This is an ordinary practice designed to improve the overall efficiency of organisations' fundraising activity and, ultimately, benefits those who gain from the philanthropy of our donors (for example, current and future students).</p> <p>This allows RCS to conduct its legitimate fundraising activity in a much more effective fashion which improves what RCS can offer its students.</p>

## CO-ORDINATING OUR APPROACH

We want to be able to co-ordinate information about engagement with donors across the organisation, as part of a targeted approach to our work. This co-ordination also reflects the interests of donors, allowing us to reduce duplication and engage in a more meaningful way.

We use a relationship management database to help us:

- Co-ordinate our interactions and engagement with you
- Avoid sending you duplicate information from different sources
- Understand your communication preferences
- Keep your details up to date
- Build a better understanding of the priorities and preferences of individual donors and stakeholders
- Tailor marketing and non-marketing communications and invitations to the subjects we think will most interest you

We may for example record information about:

- Your interactions with departments or faculties of the RCS
- Events you have registered to attend
- Further donations you have made
- Changes to your contact details
- Ticket purchases

This co-ordination will allow the RCS to provide you with the most appropriate donors experience in a way that best suits you and your preferences and areas of interest, and supports the RCS and its students success.

The RCS has a legitimate interest to ensure our work is done effectively across the organisation and to ensure that any contact with you is not duplicated.

## **WHAT DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

1. Identity Data includes name, date of birth, nationality.
2. Contact Data includes phone number, postal address and email address.
3. Financial Data includes method of donation payment and gift aid information.
4. Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

## **SPECIAL CATEGORY DATA**

Within our data processing, we may also collect and process certain “special category” data that you provide us, such as:

- Information about your health, including any access or dietary requirements you may have. This is to allow us to ensure that you have the best experience possible in our buildings & venues. We process this special category data to meet our health and safety and other legal obligations.

If we collect special category data about you, we will have safeguards and justifications in place to allow us to process and store that data securely.

### **IF YOU DO NOT PROVIDE US WITH PERSONAL INFORMATION**

If you do not provide us with the personal information we ask for, we may not be able to perform all or part of the services we may offer to you (for example, allowing you to join the Company of Donors, or sending you information about performances).

It is also important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

### **PROTECTING YOUR PERSONAL INFORMATION**

We have in place appropriate security measures to prevent your personal information from being accidentally lost, used, accessed, altered or disclosed in an unauthorised way. We limit access to your personal information to those employees and third parties who have a business need to access your data. This applies equally to paper and electronic records. We have in place procedures to deal with any security breaches and will notify you and the regulator of any suspected breach where we are legally required to do so. Further information can be found in our [Data Protection Policy](#).

### **DATA SHARING WITH OTHER PARTNERS**

We may share your personal data with approved third parties. All our third party service providers are required to afford you the same level of personal information data security as the RCS. These third parties will only process your information at our instruction and that processing will be limited to the agreed specified purposes.

- Personal data will be shared with our external partners such as wealth screeners to facilitate our understanding of current or potential donors
- Personal data will be shared for a limited time with software partners when necessary to assist fundraising events where additional resource is necessary to create guest lists and/or manage events
- For scholarship recipients, personal data and scholarship outcomes are shared with the scholarship funders as outlined in scholarship recipient paperwork
- Where a donor requests a seat dedication, a limited amount of personal data is shared with an external engraver
- To complete research on our current and prospective donors we may collect your personal data via a third party survey company
- To facilitate Gift Aid we are required to share personal data along with some details of the financial gift with HMRC

### **HOW LONG WILL WE HOLD YOUR PERSONAL INFORMATION**

We will only retain your personal information for as long as it is necessary to fulfil the purposes for which we collected it and to fulfil any legal, financial, accounting or reporting requirements. The RCS Record Retention Schedule can be found on the RCS website in our [Freedom of Information Publication Scheme](#)

## COOKIES

RCS uses cookies on our website(s) to track visitor interactions. We then use the information to compile reports and to help us improve our websites. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. You can find our [Cookie Policy](#) online.

## CREDIT/DEBIT CARD INFORMATION

If you use a debit or credit card to purchase from us or make a donation, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS).

We optionally allow you to store your card details for future use. This is carried out in compliance with PCI-DSS in a way where none of our staff members are able to see or access your full card number. We never store your 3 or 4 digit security code.

## YOUR RIGHTS

You have a range of rights under data protection legislation. You have the right to:

- **Be informed:** about the collection and use of your data
- **Access:** your personal information (commonly known as a "subject access request")
- **Rectification:** if information we hold about you is wrong, please ask us to correct it
- **Restrict Processing:** you have the right to ask us to restrict or suppress the processing of your information

The following rights apply only in certain circumstances:

- **Object:** to our processing where we rely on a legitimate interest (or those of a third party) and you object
- **Erasure:** you can ask us to delete information about you
- **Data portability:** allows you to move, copy or transfer your data easily from one IT environment to another

Any donor can exercise their rights as outlined above by contacting [dataprotection@rcs.ac.uk](mailto:dataprotection@rcs.ac.uk). You will receive a response from the RCS within 30 days.

## CONTACT US

Please get in touch with us if you have any questions about any aspect of this Privacy Notice, and in particular if you would like to exercise any of your rights as outlined above.

We can be contacted at:

**Data Protection Officer**

**Royal Conservatoire of Scotland,**

**100 Renfrew Street, Glasgow, G2 3DB**

[dataprotection@rcs.ac.uk](mailto:dataprotection@rcs.ac.uk)

## **COMPLAINTS**

If you are dissatisfied about our handling of your personal data you have the right to lodge a complaint with the Information Commissioner's Office:

### **Information Commissioner's Office:**

**A:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**E:** [casework@ico.org.uk](mailto:casework@ico.org.uk)

**W:** <https://ico.org.uk/make-a-complaint/>

**T:** 0303 123 1113