

# Privacy notice for alumni

This privacy notice describes how we collect and use personal information about alumni, in accordance with the UK General Data Protection Regulation (UK GDPR).

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

#### Who Collects This Information

Thomas Tallis School is a "data controller." This means that we are responsible for deciding how we hold and use personal information about alumni.

# Categories of Alumni Information We Collect, Process, Hold and Share:

We may collect, store and use the following categories of personal information about you:

- Contact information such as name, address, email address, contact numbers
- Details of your time at school, including records of your achievements and interests
- Records of contributions you have made to the school since leaving, such as your time, expertise, or money
- Records of how you have engaged with our alumni network, including emails you have opened, events attended, mailing lists you have signed up to and other interactions
- Bank details and other financial information if you make payments to the school
- · Records associated with Gift Aid claims on donations
- Photographs and videos of your time at school
- Information required to manage your attendance at alumni events, including access arrangements and dietary requirements which may include health conditions
- CCTV footage when attending out school sites.

We may also hold data about you that we have received from other organisations, including other schools and colleges.

#### Why we use this data

We use the data listed above to:

- Help us build a community around our school
- Offer enrichment and career development opportunities to current students
- Raise extra money so that we can continue to improve the experience students get from the school
- · Notify you of alumni events you may be interested in
- Keep you up to date with school news
- Help us promote our schools
- Maintain a record of visitors to our schools



 Keep you safe and comfortable while attending alumni events and make appropriate access arrangements

Protect your health and safety and the health and safety of others at our schools e.g., staff and students

Tailor the communications we send to you, to ensure they are appropriate and relevant

# Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Other schools and colleges
- Police forces, courts, tribunals
- Your family
- Other third parties who you have dealt with.

### Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you. You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us.

# Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

# Our lawful basis for using this data

We only use your personal data when the law allows us to. Most commonly, we process it where:

We need to comply with a legal obligation – this means we need to process the data to meet our responsibilities under law.

We need it to perform an official task in the public interest – this means we need to use your data to fulfil our official function.

You have given us specific and explicit consent to use it in a certain way.

We need to protect your vital interests (or someone else's interests) for example, in a medical emergency.

Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests.

Where you have provided us with your consent to use your personal information, you may take back this consent at any time. We will make this clear when requesting your consent and will explain how you would go about withdrawing your consent if you wish to do so.



Some of the reasons listed above for collecting and using personal information about you may overlap and there may be several grounds which justify the use of your data.

### Our basis for using special category data

For 'special category' data (more sensitive personal information), we only collect and use it where we have both a lawful basis, as set out above and one of the following conditions for processing as set out in data protection law:

- We have obtained your specific and explicit consent to use your information in a certain way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to process if for reasons of substantial public interest as defined in legislation
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to use it for health or social care purposes and it is used by or under the direction of a professional obliged to confidentiality under the law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving or for statistical purposes, and the processing is in the public interest.

Some of the reasons listed above for collecting and using your personal information overlap, and there may be several grounds, which justify our use of this data.

For criminal offence data, we will only collect and use it where the law allows us to do so and in accordance with data protection law.

#### How we store this data

We keep personal information about you while you remain involved in our alumni network. We may also keep it beyond this if this is necessary. Our Data Retention Schedule sets out how long we keep information about alumni. You can locate this on your school website.

We have put in place appropriate security measures to prevent your personal information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

# **Data sharing**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Local authorities to meet our legal obligations to share certain information
- Government departments or agencies such as The Department for Education (including the
  Education Skills Funding Agency and Regional Schools' Commissioner) to meet the requirements
  under the School's Funding Agreement to provide certain information on the educational provision of
  the School.



- Educators and examining bodies to support the successful education of our students including the proper coordination of their examination entries.
- Our regulator e.g. Ofsted to meet our obligations under the legislative framework for the monitoring and evaluation and assessment of our schools.
- Governors at our schools as required to support their involvement in the governance of that school
- Suppliers and service providers to enable them to provide the service we have contracted them for.
- Financial organisations such as our school electronic payments provider to meet our schools' financial commitments and to ensure the effective working of its financial systems.
- Central and local government to meet the requirements under the School's Funding Agreement and other data collection requirements such as statistical and financial returns.
- Our internal and external auditors to meet our legal obligations to have our accounts audited in accordance with legislation.
- Survey and research organisations to support the collation of data to support the improvement of education across the country.
- Health authorities and health and social welfare organisations—to meet our obligations to protect the
  welfare of our students. This includes NHS Test and Trace/Public Health England where necessary
  in relation to Coronavirus (Covid 19) after you have visited one of our schools or the School's office.
  Security organisations—to ensure that our staff and students are as safe as possible and to meet
  our obligations and duties under legislation.
  - Professional advisers and consultants –Police forces, courts, tribunals to meet our obligations to share certain information in accordance with legislation.

#### Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

# Your rights

# How to access personal information we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- · Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- · Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.



If you would like to make a request, please contact our data protection officer.

### Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

### **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Data Protection Officer: Judicium Education Ltd

72 Cannon Street, London, EC4N 6AE Email: <a href="mailto:dataservices@judicium.com">dataservices@judicium.com</a>

Telephone: 0203 326 9174 Lead Contact: Craig Stillwell