

Privacy Notice for School Alumni

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **alumni** of the school.

We, Bournemouth School, are the 'data controller' for the purposes of UK data protection law.

Our Data Protection Officer is Mrs L Domeney (see 'Contact us' below).

2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Name
- Contact details
- Details about your time at the school, including records of your achievements and interests
- Details of your experience, career and employers since you left the school
- 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 any other interactions
- Bank details and other financial information, if you make any payments to the school

- Records associated with Gift Aid claims on donations
- Information required to manage your attendance at alumni events, including access arrangements and dietary requirements (which could amount to 'special category' personal data, which is more sensitive)

Special Categories of more sensitive personal data which consists of any information concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, health, genetic or biometric data and trade union membership. We may collect, use, store and share (when appropriate) information about you that falls into special categories, this includes, but is not restricted to:

- Photographs for identification purposes for the duration of your visit •
- Information about any health conditions you have that we need to be aware of
- Information about disability and access requirements
- Photographs and CCTV images captured in school •

3. Why we use this data

We use this data to:

- a) Identify you and keep you safe while on the school site
- b) Keep students and staff safe
- c) Maintain accurate records of visits to the school
- d) Provide appropriate access arrangements
- e) Help us build a community around the school
- f) Offer enrichment and career development opportunities to current pupils
- g) Raise extra money so that we can continue to improve the experience pupils get from the school
- h) Account for and report as required in relation to any donations received
- i) Notify you of alumni events you may be interested inj) Keep you up to date with school news
- **k)** Help us promote the school
- I) Tailor the communications we send to you, to ensure they are appropriate and relevant
- m) Provide information to emergency personnel in the event of an emergency only
- n) Ask you for financial contributions towards the school, and facilitate this efficiently
- o) Analyse the composition of our alumni group to help us decide what events or activities to run
- **p)** Providing you with marketing communications based on what we think you'll be interested in

3.1 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 promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent of receiving these emails at any time by contacting us (see 'Contact us' below).

3.2 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.

4. Our lawful basis for using this data

Under UK data protection law, the legal bases we rely on for processing your personal data for the purposes listed above are as follows:

- For the purposes of (a, b, c, d, e, f, g, h, i, j, k and l), in accordance with the 'public task' basis; we need to process data to fulfil our statutory duties placed upon us as a school. The relevant legislations and guidance that may apply, but are not limited to, are:
 - o Education Act 1996
 - Keeping Children Safe in Education (KCSiE)
 - Health and Safety at Work etc. Act 1974
 - o Equality Act 2010
- For the purposes of **(m)**, in accordance with the 'vital interests' basis we will use this personal data to protect you in a life-or-death situation
- For the purposes of **(n, o and p)**, in accordance with the 'legitimate interests' basis; in processing your data, we will carry out a 'balancing test' to make sure our processing does not infringe your interests, rights and freedoms. We will only use the data in ways that you would reasonably expect.

Where we have obtained consent, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how to withdraw it.

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

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- 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
- The data concerned has already been made manifestly public by you
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under 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 purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific 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
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting this information

Some of the information we collect from you is mandatory, and in some cases, it is voluntary.

Whenever we seek to collect personal information from you, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

We will only collect the data that we need in order to fulfil our purposes, which are set out above.

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
- Police forces, courts, tribunals

6. How we store this data

Personal data is stored in accordance with our Data Protection Policy and stored on the school's network.

Where personal information is necessary and relevant to our contract with you, we keep it secure and is only used for purposes directly relevant to your work with the school. We also keep personal information about you, your representatives, employees and agents whenever you/they visit our school. We may keep it beyond the visit if this is necessary in order to comply with our legal obligations.

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

When your relationship with the school has ended, your data will be disposed of in compliance with data protection legislation and in accordance with the record retention, destruction and guidance found in the 'Academies Toolkit' from the Information Records Management Society. (*Please copy <u>https://irms.org.uk/page/AcademiesToolkit</u> into a browser).*

7. Who we share data with

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

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

- Our local authority (BCP Council) to meet our legal obligations to share certain information with it, such as where the alumni information is relevant to a safeguarding concern
- The Department for Education
- Educators and examining bodies
- Our regulator [specify as appropriate, e.g. Ofsted, Independent Schools Inspectorate]
- Suppliers and service providers to enable them to provide the service we have contracted them for
- Central and local government, e.g. HMRC to meet our accounting and reporting obligations relating to donations received
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

• Professional bodies

7.1 Transferring data internationally

We will not share your personal data internationally, however should this change we will inform you prior to this taking place. Should we be required to transfer your personal data to a third-party country or territory, we will do so in accordance with UK 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.

8. Your rights

8.1 How to access the 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 (subject to any exemptions that may apply):

- 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 a 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.

8.2 Your other rights regarding your data

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

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge 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
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- 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.

9. 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 https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. 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:

Mrs L Domeney, Compliance Manager, Bournemouth School, East Way, Bournemouth, BH8 9PY Idomeney@bournemouth-school.org



Bournemouth School

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The latest version of this policy may be accessed through our website – Yes