



the
beckmead
trust

Privacy Notice for Alumni

- nurture
- sustain
- grow

Name of Policy	Privacy Notice for Alumni
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Signature	Dee Fullerton
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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our 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**.

Our trust, The Beckmead Trust, 170 Sanderstead Road, 0203 772 8805 (option 3)
dpo@beckmeadtrust.org, is the 'data controller' for the purposes of UK data protection law.

Our data protection officer is [Dee Fullerton] (see 'Contact us' below).

2. The personal data we hold

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

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

- Name
- Contact details and communication preferences
- Details about your time at the school, including records of your achievements and interests
- Your education history
- 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
- Your professional activities and employment

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Photographs of your time at the school
- Information required to manage your attendance at alumni events, including access arrangements and dietary requirements

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

3. Why we use this data

We use the data listed above to:

- a) General administration (e.g. event management, processing of donations, internal record keeping)
- b) Help us build a community around the school
- c) Offer enrichment and career development opportunities to current pupils

- d) Raise extra money so that we can continue to improve the experience pupils get from the school
- e) Seek non-financial support (e.g. careers advice to students, sharing of expertise)
- f) Notify you of alumni events you may be interested in
- g) Keep you up to date with school news
- h) Help us promote the school
- i) Keep you safe and comfortable while attending alumni events
- j) Tailor the communications we send to you, to ensure they are appropriate and relevant

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 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 (see 'Contact us' below).

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

We do not currently process any alumni 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

Our lawful bases for processing your personal data for the purposes listed in section 3 above is in accordance with the 'legitimate interests':

- Maintaining a record of those who were educated at the school
- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity
- To make use of photographic images in school publications, on the school website and (where appropriate) on the school's social media channels
- To give and receive information and references about past pupils, including to any educational institution that it is proposed they attend; and to provide references to potential employers
- For security purposes, including CCTV in accordance with the school's CCTV policy
- To carry out or cooperate with any school or external complaints, disciplinary or investigation purposes
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

Unless the relevant individual objects, the school will also:

- Share personal data about alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community
- Contact alumni by post, email and phone in order to promote and raise funds for the school and, where appropriate, other worthy causes

In addition, we may process your personal data in order to comply with our legal obligations, such as our accounting and reporting requirements in relation to any donations received, and complying with our duties under equality legislation.

Less commonly, we may process alumni personal data in situations where:

- We need it to perform an official task in the public interest
- We need to protect someone's vital interests (save your life, or someone else's)

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.

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

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 1 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 the establishment, exercise or defence of legal claims
- 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 data

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

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
- Police forces, courts or tribunals

6. 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 record retention schedule/records management policy sets out how long we keep information about alumni. A copy of our record retention schedule/records management policy is available upon request by contacting information@beckmeadtrust.org

Except as otherwise permitted or required by applicable law or regulation, the School only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

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. In addition we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

Third parties will only process your personal information on our instructions and where they have agreed to treat information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

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

7. Who we share data with

We do not share information about you 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 you with:

- Our local authority for the area that covers individual schools – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- The Department for Education

- Educators and examining bodies
- Our regulator e.g. Ofsted
- 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
- Third party suppliers providing redaction services as part of a valid information request that complies with current legislation.

7.1 Transferring data internationally

We may share personal information about you with ~~the following~~ international third parties, where different data protection legislation applies. We may share your information internationally where (but not limited to):

- we or a company we work with store information on computer servers based overseas; or
- we communicate with you when you are overseas.

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law and appropriate steps will be taken to keep the data secure. We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA. The UK and countries in the EEA are obliged to adhere to the requirements of the GDPR and have equivalent legislation which confer the same level of protection to your personal data.

For organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.

Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

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 personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

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 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 us (see 'Contact us' below)

8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, 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 us (see 'Contact us' below).

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.

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

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- 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 or concerns, or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Dee Fullerton, dpo@beckmeadtrust.org

However, our **data protection leads** have day-to-day responsibility for data protection issues in our schools. The data protection lead in schools is the Head Teacher or delegated senior management member of staff for this purpose. For Central Services please contact the DPO.

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact them in the first instance.

11. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.