

# **PRIVACY NOTICE - ALUMNI**

This notice is intended to provide information about how Yarm School collects and uses personal data about our alumni. This notice should be read in conjunction with the School's 'Privacy Notice for Parents and Pupils', 'Pupil Data Retention Policy' and 'Data Retention Policy', which can be found on <a href="mailto:the School's website">the School's website</a>. We keep this notice under review. This notice supplements the other notices and is not intended to override them.

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how the School uses any personal data that we hold about them.

#### INTRODUCTION

In order to inform and engage alumni in a bespoke manner, the School processes personal data which you provide us during your time at the School, or within the 'former pupil - add/update my details' form. This helps to ensure alumni get the best information and contact available and also helps us, where appropriate, to ask for your support with the things we believe you care about.

Processing means any operation or set of operations performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Prior to you leaving the School as a student, we will ask you to complete the 'former pupil - add my details' form to let us know whether you wish to receive alumni information from the School in the future - this is your opportunity to provide us with consent, or not, to continue to contact you with this information. You may also provide us with consent, or not, to contact you with this information by completing the 'former pupil - add/update my details' form on the School website at any time. All alumni data which you provide in the form will be stored in electronic format. This privacy notice relates to these records. It does not apply to records created whilst a student is on roll at Yarm.

We will retain your former pupil data for 50 years in anticipation of what we hope will be a lifelong relationship with Yarm School, or until you request us to do otherwise (see 'Your rights about the data we hold' below). We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. After 50 years, we will securely remove your former pupil data from our database and you will no longer receive alumni information, unless you have contacted the School or completed the 'former pupil - add/update my details' form again to confirm you wish to remain opted-in.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## THE PERSONAL DATA WE HOLD

Being a former Yarm School pupil, we may extract and retain limited key information from your MIS pupil record, which was compiled to support your time while a pupil/student at Yarm. [To find out more information about what is retained on your MIS pupil record, please see our 'pupil data protection policy and data retention policy'. The remainder of your MIS profile will be retained according to our Data Retention Policy and then securely disposed of.

The data we hold in your MIS record about you may include:

- Your title, name, gender, and date of birth
- Your school photograph
- Your home or parental address, email address and telephone numbers
- Your familial relationships (parents, grandparents and siblings)
- Subjects studied, school House and achievements (sports, music, etc.)
- Start and end dates and destination upon leaving
- Contact details updates, occupation, event registration and careers volunteer activity

We will also collect details of your consent (or otherwise) in your MIS record, where you have consented to receiving alumni communications from us in the 'former pupil - add/update details' form. If you indicated that you want to be contacted <u>by email</u>, we must also comply with The Privacy and Electronic Communications (EC Directive) Regulations 2003. You can change your mind and withdraw your consent at any time but must do so by contacting <u>alumni@yarmschool.org</u>. The remainder of your MIS record will be unaffected by withdrawing your consent to receiving alumni communications.

We may also hold personal data relating to your educational and professional history. This information will also have been provided by you when you complete the School's 'former pupil - add/update details' form. The form may either have been emailed directly to you or you can access it via the School's website. We may also obtain this information through direct contact with you including in the ordinary course of interaction such as email or written communication, at events and other school activities. This information could include:

- Any education or training you started after leaving Yarm
- Your employment status (e.g. part-time, full-time, retired)
- Your current job title and work email address
- Your current and past employers, name, address and telephone number
- The dates that you have been employed in any particular role
- Your previous role(s) and job title
- Your photograph

In some cases, other information is added when you provide it to us, such as:

- Special categories<sup>1</sup> of data you provide for a specific purpose (e.g. disability or dietary requirements for event management purposes)
- Information about your family and other relationships
- Your bank details (should you decide to make a donation to the School, your details are stored within the finance system)

<sup>&</sup>lt;sup>1</sup> See 'HOW WE STORE, ACCESS AND PROTECT YOUR DATA" for data security information.

Information about your areas of interest and desire to support Yarm

We may also update your record based on information available in the public domain e.g. LinkedIn. We hold and process this information on the grounds that it is in the 'legitimate interests' of the School to do this and is also beneficial to the individuals concerned (Article 6(1)(f) of GDPR).

We may track the emails you open and the links you click on in our emails, and may use this to personalise digital content to you. This is necessary for our legitimate interests (for running our website, provision of administration and IT services, network security, to study how you interact with our emails, develop our method of communication and inform our strategy).

Ordinarily therefore, the onus is on you as the data subject to tell us whenever you want us to delete your data. As a data subject, the implication for you upon deletion of your records would be that you no longer receive any communications from School about alumni related events and activities. The School website uses cookies to retain user preferences and collect website usage information via Google Analytics such as IP addresses. This is necessary for our legitimate interests (to define types of user, to keep our website updated and relevant and to develop and inform our strategy). Further information on cookies, and how to disable them if desired can be found on our <u>Cookies and Privacy Statement page</u>.

## **HOW WE USE YOUR DATA**

The information you provide in the 'former pupil - add/update details' form is used by the School for a host of alumni activities. When you consent to us doing so, and provide your personal data to us in the form, we may contact you with relevant information and marketing communications such as:

- School and alumni news
- School and alumni events
- Opportunities to return to the School virtually on in person, such as careers events, guest lectures and mock interviews
- Requests for non-financial support, such as volunteering and providing website content
- Fundraising appeals.

You have the right to withdraw consent to receiving these communications at any time by contacting us. Where you opt out of receiving these messages, this will not apply to personal data provided to us as a result of your time at the School.

Where appropriate, we may contact you with alumni information where you are a parent of a pupil who has attended or is currently attending the School. On the basis you have engaged with the School, given the School your details and were given an opportunity to opt out of receipt when we collected your information, and have subsequently not opted out of receiving our messages, we may send you information about our events and other activities. This does not apply to non-commercial promotions, such as fundraising appeals.

The School will always make you aware if fundraising is going to be a part of any activity or event you are invited to, for example if we plan to donate a percentage of ticket sales from an event to a fundraising opportunity.

## **CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **INTERNATIONAL TRANSFERS**

We store some personal data you provide to us on G-drive, this is provided by Google which is hosted in Europe. Whenever we transfer your personal data out of the UK to Europe, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data; or

We may use specific contracts or T&Cs approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

Communications may be sent electronically, by post or telephone depending on your communication preferences.

We occasionally conduct research to help us understand our alumni. This may include gathering information from publicly available resources to give an insight into your philanthropic interests and ability to support the School. This is sometimes referred to as 'wealth screening'.

From time-to-time we may also conduct some analysis of our data to help us understand our alumni and supporters. This is to produce alumni population and engagement reports and to tailor the communications that are sent to you.

## **OUR LAWFUL BASIS FOR USING THIS DATA**

We will process the personal information you provide only when we have your express consent to do so, or when it is in our or your legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Such legitimate interests include enhancing the experience of both our alumni and potentially our current students.

## HOW WE STORE, ACCESS AND PROTECT YOUR DATA

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. For information about these measures, please see our '<u>Data Retention Policy</u>.'

The information we collect is used to create a record on the School's database hosted online. For the most part, personal data collected will remain within Yarm School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Access is controlled through user security profiles, which always include a strong password as a minimum, and may also include a second level protection, in addition to the School's IT firewall which is regularly updated.

All school employees who are given access to personal data receive Data Protection training and have a contractual responsibility to maintain confidentiality.

## SHARING DATA

In accordance with Data Protection Law, some of our processing activity is carried out on our behalf by third parties, such as our web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions.

Your personal data will not be passed without your permission to external organisations or individuals other than those companies with whom we have contractual agreements with regarding data security, such as the School's website developer. Your personal data will never be sold by the School.

## YOUR RIGHTS ABOUT THE DATA WE HOLD

Yarm School is the controller and responsible for your personal data. We have appointed a Privacy Officer who is responsible for overseeing questions in relation to this notice. If you have any questions about this notice, please contact the data privacy manager using the details set out below.

Full name of legal entity: Yarm School Email address: cje@yarmschool.org

Your rights and wishes in respect of the personal data we hold about you are very important to us. If you have any queries, wish to restrict data processing including use for marketing and/or fundraising or do not want to be contacted by the School, please contact us or update your preferences online. If you choose to opt-out of all communications, minimal information is always retained to make sure you are not contacted again inadvertently (e.g. name, leavers' year, and a record of your decision not to be contacted again by the School).

You have other rights to your personal data, such as requesting a copy of the data we hold about you, requesting data be corrected, erased, restricted, object to processing or transfer your data elsewhere. To find out more about these rights and the conditions associated with them please see our <a href="Pupil Data Protection Policy">Pupil Data Protection Policy</a> and our <a href="Privacy Notice for Pupils and Parents">Privacy Notice for Pupils and Parents</a>.

If your personal details change, we really appreciate you taking the time to notify us. We will only contact you if you have provided us with consent or if there is a specific need which also complies with data protection rules.

Under GDPR, you have the right to withdraw your consent for us to use your data or to have us correct it, should you consider it inaccurate. You can do this by updating your form entry on the school website or by emailing alumni@yarmschool.org.

You can also make a referral to, or lodge a complaint with, the Information Commissioner's Office (ICO) <a href="https://ico.org.uk/">https://ico.org.uk/</a> if you believe that we have not handled your data according to the principles of GDPR. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

# Changes to this notice

From time-to-time this notice may be updated at the School's discretion or when legal requirements mandate a change. Any revisions will normally only be notified via this webpage. All of the latest changes will be highlighted in yellow and the date of which the latest revisions were made will be noted at the bottom of this page.