

This privacy notice describes how we collect and use personal information about you as you are an alumnus with us, 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.

This privacy notice applies to all alumni.

### **Who Collects this Information**

The Oxford Diocesan Bucks Schools Trust is a “data controller.” This means that we are responsible for deciding how we hold and use personal information about you.

We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of a contract to provide services and we may update this notice at any time.

It is important that you read this notice, with any other policies mentioned within this privacy notice, so you understand how we are processing your information and the procedures we take to protect your personal data.

### **Data Protection Principles**

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

### **Categories of Alumnus Information we Collect, Process, Hold and Share**

We process data relating to alumni. Personal data that we may collect, process, hold and share (where appropriate) about you includes, but not restricted to:

- Contact information such as name, address, email address, contact numbers;
- Historical records of your time in school, including records of your achievements and interests, photos and videos;
- Records of contributions you have made to the school since leaving, such as your time, expertise, or financial contribution;
- 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;
- Records associated with Gift Aid claims on donations;
- Records of your consents and contact preferences;
- Information required to manage your attendance at alumni events, including access arrangements and dietary requirements which may include health conditions; and
- CCTV footage when attending our school site.

- Information about your willingness to participate in mentoring, work experience, or careers advice activities.
- Social media interactions with our official school accounts.
- (For secondary school alumni) We may also collect data related to post-16 destinations, career pathways, and higher education engagement, where applicable.

### **How we Collect this Information**

We may collect this information from you in a number of different ways. The main data collection will be by our registration form, but we may also collect data through our signing in system, our websites and other technical systems such as our computer networks and connections, CCTV and access control systems, remote access systems, email and instant messaging systems, intranet and internet facilities.

We may also collect information through:

- Alumni networking events and reunions
- Professional networking platforms (LinkedIn) where you interact with our school pages.
- Mentoring and careers advice programmes
- Third-party alumni platforms or service we may use

### **How we use your Information**

We will only use your personal information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Where we need to comply with a legal obligation (such as health and safety legislation, under statutory codes of practice and employment protection legislation);
- 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.
- When you have provided us with consent to process your personal data.
- For secondary school alumni, we may contact you regarding opportunities to support careers events, mentoring, or work experience placements for current students, where you have provided consent.

Our legitimate interests include:

- Maintaining relationships with former pupils to build a supportive alumni community
- Enhancing current pupils' education through alumni career guidance mentoring
- Fundraising activities to support school development and student opportunities
- Promoting the school's reputation and achievements
- Facilitating network opportunities between alumni

We need all the categories of information in the list above primarily to allow us to perform our contract with you, with your consent and to enable us to comply with legal obligations.

The situations in which we will process your personal information are listed below:

- Alumnus management including retention;

- Complying with legal obligations;
- Carry out necessary administration functions;
- Health and safety obligations;
- Prevention and detection of fraud or other criminal offences;
- To defend the School in respect of any investigation or court proceedings and to comply with any court or tribunal order for disclosure;
- Help us build a community around our school;
- Offer enrichment and career development opportunities to current students;
- Raise money so that we can continue to improve the experience students get from school;
- Notify you of alumni events you may be interested in;
- Keep you up to date with school news;
- Help us promote our school;
- Maintain a record of visitors to our school; and
- Tailor the communications we send to you, to ensure they are appropriate and relevant.
- Coordinate work experience and internship opportunities
- In rare cases we may retain limited information for safeguarding purposes, in line with statutory guidance and our safeguarding policy.
- Support careers guidance and university application advice

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

We will only use your personal information 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.

### **Marketing Communications and Your Rights**

Under the Privacy and Electronic Communications Regulations (PECR), we must obtain your consent before sending you electronic marketing communications. You have the right to:

- Opt out of marketing communications at any time
- Choose which types of communications you wish to receive (e.g. newsletters, event invitations, fundraising appeals)
- Update your communication preferences

We will clearly identify all marketing communications and provide easy ways to unsubscribe. You can update your preferences by contacting Rachael Hollinshead or using the unsubscribe links in our communications.

### **How we use Particularly Sensitive Information**

Sensitive personal information (as defined under the UK GDPR as “special category data”) require higher levels of protection and further justification for collecting, storing and using this type of personal information. We may process this data in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our data protection policy;
- For legitimate interests; where there is a clear benefit to our alumni community and current pupils, and your fundamental rights and freedoms are not overridden;
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- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards. Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else’s interests) and you are not capable of giving your consent.

### **Sharing Data**

We may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. These include the following:

- Other ODBST schools and central services team
- Professional advisors such as lawyers and consultants;
- The School finance/accounting teams; and
- Support services (including insurance, IT support and information security).
- Current pupils and their families (with your explicit consent, for mentoring and careers guidance purposes)
- Other alumni (for networking purposes, with appropriate privacy controls)
- Universities and employers (only with your explicit consent, for reference or networking purposes)
- Event management companies (for alumni events)
- Fundraising consultants and platforms
- Alumni networking platforms and services

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK and the EU for alumni services or networking platforms. If we do, you can expect a similar degree of protection in respect of your personal information.

### **Retention Periods**

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 will retain your data for as long as you remain a member of our alumni and up to a year afterwards (or longer if the law requires us to, e.g. for financial records).~~ Retention periods may vary slightly depending on the nature of alumni engagement and the age at which the individual left the school (e.g., post-16 or post-18).

We will retain your data as follows:

- Contact information and basic alumni details: Indefinitely, unless you request removal
- Financial records (donations, Gift Aid): 7 years from the date of the last transaction
- Event attendance records: 6 years after the event
- Marketing preferences and consent records: Until consent is withdrawn, then for 1 year to demonstrate compliance
- CCTV footage: Maximum of 30 days unless required for investigation purposes

You can request the removal of your information from our alumni database at any time, subject to our legal obligations.

### **Security**

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). 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. Details of these measures are available on our data protection policy.

### **Your Rights of Access, Correction, Erasure and Restriction**

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

Under certain circumstances by law you have the right to:

- Access your personal information (commonly known as a “subject access request”). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.

- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

You also have the right to object to processing based on legitimate interests. We will stop processing your personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms.

If you want to exercise any of the above rights, please contact Rachael Hollinshead in writing.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

#### **Right to Withdraw Consent**

In the circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Rachael Hollinshead. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

This includes the right to withdraw consent to marketing communications, mentoring programmes, and sharing your information with current pupils or other alumni.

#### **Contact and data protection officer**

We hope that Rachael Hollinshead can resolve any query you raise about our use of your information in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Rachael Hollinshead then you can contact the DPO on the details below:

Data Protection Officer: Judicium Consulting Limited

Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB

Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)

Telephone: 0345 548 7000 (Option 1, then 1)

### **How to Raise a Concern**

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

- 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

### **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.