



## TCS Privacy Notice – Alumni

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<b>Notice Prepared/Reviewed by:</b>	J Worth
<b>Committee responsible</b>	Finance, Business and Community
<b>Statutory/Discretionary</b>	Statutory
<b>Date of Last Review</b>	02/02/2021
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### Privacy notice for school alumni

Under 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, in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

We, Testbourne Community School, (hereafter referred to as ‘the school’) are the ‘data controller’ for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal information about you.

Our data protection officer is Mr Jonathan Worth (see ‘Contact us’ below).

### 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
- Photographs of your time at the school
- 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
- 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)



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- Bank details and other financial information, if you make any payments to the school
- Records associated with Gift Aid claims on donations

## Why we use this data

We use this data to:

- Help us build a community around the school
- Offer enrichment and career development opportunities to current pupils
- Raise extra money so that we can continue to improve the experience pupils 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 the school
- Keep you safe and comfortable while attending alumni events
- Tailor the communications we send to you, to ensure they are appropriate and relevant

## Use of your personal information for marketing purposes

Where you have given us consent to do so, the school 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 texts and/or emails at any time by clicking on the "Unsubscribe" link at the bottom of any such communication, or by contacting our data protection officer.

## Our lawful basis for using this data

We only collect and use your personal data when the law allows us to. Most commonly, we process it where we have obtained explicit consent to use it in a certain way, and where we have legitimate interests in processing the data.

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.

Where we have legitimate interests 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.

The legitimate interests we have are:

- Asking you for financial contributions towards the school, and facilitating this efficiently
- Analysing the composition of our alumni group to help us decide what events or activities to run
- Providing you with marketing communications based on what we think you'll be interested in

We also use your data in order to fulfil the terms of our contract with you.



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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.

## Collecting this information

Some of the information we collect from you is mandatory, and in some cases you can choose whether or not to provide the information 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.

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

## How we store this data

We will keep your personal data while you remain involved in our alumni network. We may also keep it beyond this, if necessary, to comply with our legal obligations. Personal data is stored in accordance with our Data Protection Policy and the Hampshire County Council Records Retention Schedule (HCCRRS). The Data Protection Policy is available through our website and the HCCRRS is available upon request.

Our Records Retention Schedule sets out how long we keep information about alumni.

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.

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

## Data sharing

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 data protection law) we may share personal information about alumni with:

- Our local authority – 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



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- Our regulator Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

## Your rights

### 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:

- 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.

### 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 a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict its processing



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- 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 <https://ico.org.uk/concerns/>
- 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**:

- Mr Jonathan Worth – [dpo@testbourne.school](mailto:dpo@testbourne.school)