

# **Privacy Notice for 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 notice explains **how** and **why** the School collects personal information about you when carrying out our alumni relations and fundraising activities.

This notice also outlines **what we do** with your information and what **decisions** you can make about your information in relation to alumni relations and fundraising.

We, Great Walstead School, East Mascalls Lane, Lindfield, Haywards Heath, West Sussex, RH16 2QL, are the 'data controller' for the purposes of data protection law.

Old Great Walsteadians (OGW) is the name of the alumni organisation, but it is part of the School and is not a separate organisation. The School's marketing office processes all information about the School's alumni. The Friends of Great Walstead (FOGWA) is the name of the parents' body, but it too is part of the School.

Staff responsible for data protection are the Head and Director of Finance & Operations (see 'Contact us' below).

## The personal data we hold

Personal information is information that identifies you as an individual and relates to you. This includes your contact details and your relationship with the School as an OGW.

We may receive information about you from other teams within the School but only where this is relevant to our work. We hold a specific database with information about alumni, parents, staff, former parents, former staff and other supporters.

You provide us with information about yourself during the course of our relationship with you. For example, when you sign up to receive communications from us or tell us you are attending School events (e.g. OGW Day).

We will hold information such as:

- the dates when you or your child attended the School (if applicable);
- if you are a former staff member the dates when you worked at the School;
- your contact details;
- information about your achievements and interests;
- how you like to hear from us e.g. whether you have signed up to receive emails from us;
- · records of any donations;
- your Gift Aid status if applicable;
- copies of correspondence;

- any dietary requirements for catering purposes that you have provided; and
- any disability which you may have so that we may make reasonable adjustments for you.

#### Why we use this data

We use your information in the following ways:

- to keep you informed about events and activities and in relation to your attendance at those events;
- to facilitate interaction between members of the School community;
- to keep you informed about what is happening at the School;
- in connection with providing financial support for the charitable aims of the School, and
- in connection with the other ways in which you might support the School.

We will contact you for the above purposes by email, telephone, post or by text message. If you tell us that you do not want to be contacted for any of these purposes then we will of course respect that.

## Our lawful basis for using this data

This section contains information about the legal basis that we are relying on when handling your information.

## Legitimate interests:

This means that we are using your information when this is necessary for our legitimate interests, except when your interests and fundamental rights override our legitimate interests. We rely on legitimate interests to use your information for all of the purposes described above unless consent applies (in which case see below). Specifically, we have a legitimate interest in:

- ensuring that there is an active community of supporters which will benefit the School and members of the School community, such as current and former pupils, parents and staff;
- promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise
  money for a bursary fund or new buildings;
- safeguarding and promoting the welfare of our pupils with whom you may be in contact; and
- ensuring that we comply with our legal obligations.

## Consent

You can withdraw your consent for us to use your information at any time. Any use of your information before you withdraw your consent remains valid. To withdraw your consent please contact the Marketing Manager on 01444 483528 so we can update your database.

# Legal obligation

On some occasions we will need your information to comply with a legal obligation. For example, we may need to keep a record of who is attending an event so that we can comply with our health and safety obligations.

## Vital interests

For example, to prevent someone from being seriously harmed or killed.

#### Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide 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.

#### How long do we store this data?

We will keep information about you for as long as we need to do so, in compliance with our data protection and other legal obligations. For example, we will need to retain contact details for you for so long as you want to be part of the school community as an OGW, so that we can communicate with you.

We will also need to keep a record if you tell us that you do not want to hear from us anymore, so that we do not inadvertently add you to our mailing list in the future.

We will keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School.

The School will also keep information for a long time as part of its wider legal and regulatory obligations, even if that information is no longer needed for marketing, alumni relations or fundraising purposes. For more information on how personal information is used by the School more widely please contact either the Head or the Director of Finance & Operations.

#### **Data sharing**

- In accordance with our legal obligations, will share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns.
- On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders.
- We may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- We will need to share information if there is an emergency, for example, if you are hurt whilst on School premises or at one of our events.
- We may need to share information with contractors who help us with our work (e.g. a printing company for our literature).

#### Transferring data internationally

We may send your information to countries which do not have the same level of protection for personal information as there is in the UK, e.g. when communicating with you if you live overseas.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\_en.htm

# Your rights

From May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

• Rectification: if information is incorrect you can ask us to correct it.

- Access: you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- **Deletion**: you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability**: you can request the transfer of your information to you or to a third party in a format that can be read by computer in certain circumstances.
- Restriction: our use of information about you may be restricted to simply storing it in some cases. For
  example, if you tell us that the information is inaccurate we can only use it for limited purposes while we
  check its accuracy.
- **Object:** you may object to us using your information where:
  - we are using it for direct marketing purposes (e.g. to send you a School newsletter or magazine);
  - the legal ground on which we are relying is legitimate interests. Please see the section "Our legal grounds for using your information" above; or
  - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons.

The Head or The Director of Finance & Operations can give you more information about your data protection rights. To exercise any of your rights you can submit your request in writing to either the Head or The Director of Finance & Operations, Great Walstead School, East Mascalls Lane, Lindfield, Haywards Heath, West Sussex RH16 2QL.

#### **Further Information and Guidance**

The Head and the Director of Finance & Operations are the people responsible at our school for managing how we look after personal information and deciding how it is shared in relation to alumni relations and fundraising.

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

This notice is to explain how we use your personal information. Please speak to the Head or Director of Finance & Operations if:

- you object to us using your information for marketing purposes e.g. to send you information about fundraising events. We will stop using your information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about you.

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 either the Head or Director of Finance & Operations.

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
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