



## Privacy notice for alumni

### 1. Introduction

Under UK data protection law, individuals have a right to be informed about how the school and the Trust use any personal data that we hold about them. We comply with this right by providing 'privacy 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.

The Chiltern Learning Trust is the 'data controller' for the purposes of UK data protection law.

The data protection officer for the Chiltern Learning Trust is Mrs W Wells and the data protection lead at Mrs S Dartey is the Challney High School for girls school data protection lead] (see 'Contact us' below).

### 2. 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 and contact details
- Details about your time at the school, including records of your achievements and interests
- 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 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) Help us build a community around the school
- b) Offer enrichment and career development opportunities to current pupils



- c) Raise extra money so that we can continue to improve the experience pupils get from the school
- d) Notify you of alumni events you may be interested in
- e) Keep you up to date with school news
- f) Help us promote the school
- g) Keep you safe and comfortable while attending alumni events
- h) Tailor 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 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 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

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 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.

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 your 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.

#### 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 one of the following conditions for processing as set out in 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 process 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 process 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, 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 data retention schedule sets out how long we keep information for. A copy of this schedule can be found at [www.chilternlearningtrust.org](http://www.chilternlearningtrust.org) under 'policies'.

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.

## 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 (Luton Borough Council) – 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
- Our regulator, 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
- Health authorities
- Security organisations
- Health and social welfare organisations
- Financial organisations
- Our auditors
- Survey and research organisations



- Professional advisers and consultants
- Professional bodies
- Charities and voluntary organisations
- Police forces, courts, tribunals

## 7.1 Transferring data internationally

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

## 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 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 protectionUK 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 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 concerns about our data processing, please let us know 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

The **data protection officer** is Mrs W Wells, Chiltern Learning Trust, c/o Denbigh High School, Alexandra Avenue, Luton LU3 1HE, Tel: 01582 736611, email: [dpo@chilternlearningtrust.org](mailto:dpo@chilternlearningtrust.org)

However, our **data protection lead** has day-to-day responsibility for data protection issues in our school. If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact them:

- Mrs S Dartey Tel: 01582 571 427 Email: [dpl@challneygirls.luton.sch.uk](mailto:dpl@challneygirls.luton.sch.uk)