



## **Privacy Notice for Thomas's Alumni**

This policy will be reviewed annually or in response to changes in legislation		
Created	May 2022	Compliance Manager
Last Review	May 2022	Alumni Coordinator, Vice-Principal, Compliance Manager
Approved	June 2022	Principals
Next Review	May 2023	Compliance Manager

This Policy applies to all Thomas's Schools.

This Policy should be read in conjunction with Thomas's Data Protection Policy, Retention Policy and Privacy Notices for Current Pupils and Parents.

### ***Introduction***

This notice explains how and why Thomas's Alumni collects personal data about you when carrying out our alumni activities. The purpose of Thomas's Alumni is to provide everyone in the Thomas's community with opportunities to meet and remain an active part of the School throughout their lives.

If you have any questions about this notice please contact the Compliance Manager whose contact details are [compliance@thomas-s.co.uk](mailto:compliance@thomas-s.co.uk). As Thomas's Alumni is part of the School, the School is responsible for how it uses your personal data. To use data protection terminology, the School is the "data controller" or "controller".

This notice just covers how the School uses your personal data for alumni purposes. For more information about how the School uses your information more widely (for example, in relation to the provision of education to pupils) please refer to the school website for a copy of the appropriate privacy notice.

### ***What is personal data?***

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

### ***What personal data does the School hold about you and how is this obtained?***

We 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, former parents, former staff and other members of the School Alumni community.

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 order tickets for events.

In addition, we will obtain your information from other sources, which we use for the purposes described below. These are others who are involved in our alumni activities, for example, other members of your family and another alumni might tell us about your interests or your career.

We will hold information such as:

- your name, gender, and data of birth;
- your contact details;
- information about your family, for example, whether you have any brothers or sisters who attended the School;
- any connection you may have with other members of the School community such as other alumni.
- 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;
- information about your achievements and interests e.g. which sports team you were part of as a pupil;
- where you attended university and your occupation (if applicable);
- how you like to hear from us e.g. whether you have signed up to receive emails from us;
- your involvement with us. This includes correspondence with you, your attendance at our events, and whether you carry out events with our current pupils;
- information from articles in the media;
- any dietary requirements for catering purposes; and
- any disability which you may have so that we may make reasonable adjustments for you.

### ***Why do we use your personal 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 (for example, so that we can accommodate you if you tell us about any special needs or dietary requirements);
- to facilitate interaction between members of the School community;
- to tell you about products sold to benefit the School such as clothing and sports goods;
- to keep you informed about what is happening at the School, for example, by sending you a copy of the Alumni newsletter and annual magazine;
- in connection with ways in which you might support the School (such as when you volunteer, for example at careers events or pupil lectures);
- in connection with any research we carry out. For example, we may ask you to complete a survey, provide feedback or join one of our focus groups.

We will contact you for the above purposes by email, telephone, social media or post but we will only do this where we are allowed to do so under data protection law. If you tell us that you do not want to be contacted for any of these purposes then we will of course respect that.

We will take photographs or videos of you to use in our publicity or on our social media platforms and website. If we consider that the photograph or video is more privacy intrusive then we may ask for consent first.

### ***How and why does the School share your personal data with third parties?***

- If you attend one of our events, then we may share your information with event booking platforms such as Eventbrite.
- Event venues when external to Thomas's for the administration of these events;
- In accordance with our legal obligations, will share information with local authorities, the Independent Schools Inspectorate / Ofsted 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 professional advisors. For example, we may share your personal data 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 use contractors to help us with our work (e.g. a printing company for our literature) or where we store our database in the cloud.

### ***Our lawful bases for using your information***

This section contains information about the lawful 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 except where we have asked you for your consent (in which case consent applies as the lawful basis). Specifically, we have a legitimate interest in:

- ensuring that there is an active community of alumni which will benefit the School and members of the School community, such as current and former pupils and parents;
- promoting the objects and interests of the School;
- using your personal data to administer our events;
- safeguarding and promoting the welfare of our current and former pupils with whom you may be in contact e.g. if you arrange work experience or mentor a pupil; and
- ensuring that we comply with our legal obligations.

If you object to us using your information where we are relying on our legitimate interests as explained above please speak to the Compliance Manager.

We are relying on legitimate interest for all the purposes outlined in the section 'Why do we use your personal information' aside from when we specifically seek your consent.

### *Public interest task*

We rely on this basis (as well as legitimate interests) where we use personal data in order to look after those we are responsible for. For example, if we needed to carry out checks on someone before allowing them to mentor our pupils.

### *Consent*

In some cases, we are processing your personal data because you have given us your consent to do so.

If we ask for your consent to use your personal data you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. To withdraw your consent please contact the Alumni Coordinator on [alumni@thomas-s.co.uk](mailto:alumni@thomas-s.co.uk).

### *Necessary for a contract*

We will need to use your information in order to perform our obligations under a contract with you, for example, we need your name and contact details so that we can send you tickets for a concert that you wish to attend.

### *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.

### *Sensitive personal data*

The School must also comply with an additional condition where it processes certain types of more sensitive personal data. This applies to the following: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, information about sex life or orientation and information about criminal convictions or offences. We don't generally handle these types of personal data in relation to our alumni activities but we may do so occasionally. For example, we may need to use special category data in connection with your attendance at one of our events, e.g. to adjustments because of a disability you have or if you are hurt whilst taking part in an activity.

### ***Sending your information to other countries***

We may send your information to countries which do not have the same level of protection for personal data as there is in the UK. For example, we may store your information on computer servers based overseas. The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here:

[https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

## ***For how long do we keep your information?***

We have an ongoing relationship with you and we would like you to be involved with the School for many years to come. For this reason, the Alumni Office is likely to keep the majority of the personal data it holds about you indefinitely. For example, we keep your contact details so that we can continue to stay in touch with you. Similarly we will retain information about your involvement with the School as this helps us tailor our communications to you both now and in future.

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 also keep some information indefinitely for archiving purposes (this is known as "archiving in the public interest" under data protection law) and for historical research purposes. This includes the School's legitimate interest in research; supporting long-term accountability; enabling the discovery and availability of the School's and the wider school community's identity, memory, culture and history; enabling the establishment and maintenance of rights and obligations and of precedent decisions; educational purposes; and commercial and non-commercial re-use. For example, we keep some old photographs so that we have a record of what the School was like in the past. Information held in our archive may be made publicly available but this would only be done in compliance with data protection laws. Further information can be found in our records retention policy available on the School website.

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 alumni purposes. This is especially relevant to former staff, pupils and parents. For more information on how personal data is used by the School more widely please contact the Compliance Manager.

## ***What decisions can you make about your information?***

Data protection law gives you a number of rights regarding your information. Your rights are as follows:

- **Correction:** if information held about you by the School 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. 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:** you can request that we restrict how we use your personal data.
- **Object:** you may object to us using your information where:
  - we are using it for direct marketing purposes (e.g. [• to send you an email about a fundraising opportunity]);
  - the lawful bases on which we are relying is legitimate interests. Please see the section "Our lawful bases for using your information" above;

- if we ever use your information for scientific or historical research purposes or statistical purposes.

The Compliance Manager can give you more information about your data protection rights. To exercise any of your rights you can submit your request in writing to [compliance@thomas-s.co.uk](mailto:compliance@thomas-s.co.uk).

### ***Further information and guidance***

The Compliance Manager is the person responsible at our school for managing how we look after personal data and works with the Alumni Coordinator to decide how it is shared in relation to alumni relations.

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 data. The Compliance Manager can answer any questions which you may have.

If you fail to provide certain information when requested, we may not be able to provide the information or service you have requested. We may also be prevented from complying with our legal obligations.

You have a right to lodge a complaint with a data protection supervisory authority. The supervisory authority in the UK is the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)). If you do have any concerns about how we have handled your personal data we would kindly ask that you contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.