

PRIVACY NOTICE FOR SCHOOL ALUMNI

1 Introduction

The purpose of this Privacy Notice is to explain how and why New Hall School collects personal information about you when carrying out alumni relations. It aims to help you understand what personal information is, how and why we collect and process your personal information and our legal reason for doing so. It also explains your rights and the decisions that you can make about your own information.

2 Who we are

For the purposes of the GDPR and Data Protection Act 2018, New Hall School is the "data controller" of personal information for Alumni.

The School's Data Protection Lead is the person responsible for managing how we look after personal information and deciding how it is shared.

Mr Vince Holden, Vice Principal & Data Protection Lead
New Hall School, The Avenue, Boreham, Chelmsford, Essex CM3 3HS
Email: dataprotectioncompliance@newhallschool.co.uk

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.

3 What personal information does New Hall School hold about you?

We will hold information such as (* denotes information required for contractual obligations, without which we would be unable to enter into such a contract; ^ denotes information required for us to meet statutory obligations):

- the dates when you attended the School
- your contact details*
- professional activities including employment/occupation details
- information about your achievements and interests
- where you attended university and your occupation (if applicable)
- information about any bursaries or scholarships you have received
- how you like to hear from us e.g. whether you have signed up to receive emails from us*
- your involvement with us since leaving the School e.g. if you carry out mentoring of current students or volunteering for the School
- attendance at School events
- records of any donations
- your Gift Aid status if applicable
- information from articles in the media and that are shared publicly on social media platforms
- copies of correspondence
- any dietary requirements for catering purposes that you have provided^

- any disability which you may have so that we may make reasonable adjustments for you[^]

4 How do we collect information about you?

Your parents will have provided us with information about yourself during the course of our relationship with them whilst you were a student at the School. Once you have left the School, we may collect information directly from yourself or from printed or social media. You may also sign up to receive communications from us or, if you attend events, we may receive information about you from third party booking agents, such as Eventbrite.

5 What do we use your personal information for?

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 (we are grateful to individuals for sharing their professional experiences with students in order to inspire them through talks, mentoring and internships)
- to provide current students, parents and staff with updates on your achievements, for example via Alumni profiles in the School's weekly newsletter, *What's New?*
- to keep you informed about what is happening at New Hall School
- we may take photographs or videos of you to use in our publicity, which may include printed material, social media platforms and website
- 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 (such as when you volunteer)

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

6 Our legal grounds for using your information

Some of the purposes for which we use your personal information will fall under several different lawful grounds but we have set out the predominant grounds below.

7 Legitimate interests

We process your personal information because it is necessary for our (or sometimes a third party's) legitimate interests. Our "legitimate interests" include our interests in running the school in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to data protection law). In this respect, depending on your role and status, we are likely to use your personal information for the following:

- to facilitate interaction between members of the School community (we are grateful to individuals for sharing their professional experiences with students in order to inspire them through talks and mentoring and internships)
- to provide current students, parents and staff with updates on your achievements, for example via Alumni profiles in the School's weekly newsletter, *What's New?*

- safeguarding and promoting the welfare of our students with whom you may be in contact e.g. if you arrange work experience or mentor a student
- 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 contact the Data Protection Lead (details at the end of this notice).

8 Consent

We will ask for your consent for the following processing of your information:

- to keep you informed about events and activities and in relation to your attendance at those events
- to keep you informed about what is happening at New Hall School
- we may take photographs or videos of you to use in our publicity, which may include printed material, social media platforms and website
- in connection with providing financial support for the charitable aims of the School

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 Data Protection Lead via email: dataprotectioncompliance@newhallschool.co.uk

9 Necessary for a contract:

We process your personal information because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, for example. In this respect, we are likely to use your personal information for the following purposes:

- we need your name and contact details so that we can send you tickets for a concert that you want to attend
- carrying out checks with the Disclosures and Barring Service, as required for safeguarding purposes, if you are volunteering at the School

10 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.

11 Special categories of personal information
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The School must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or sexual orientation. We will process special categories of personal information for lawful reasons only, including because:

- you have given us your explicit consent to do so, in circumstances where consent is appropriate

- it is necessary to protect your or another person's vital interests, for example, where you have a life-threatening accident or illness in the workplace and we have to process your personal information in order to ensure you receive appropriate medical attention
- where we need to carry out our legal obligations or exercise rights in connection with your involvement with the School; for example, in making appropriate and reasonable adjustments for any disability a person may disclose
- it is necessary for some function in the substantial public interest, including equal opportunities monitoring, the safeguarding of children or vulnerable people, or as part of a process designed to protect others from malpractice, incompetence or unfitness in a role (or to establish the truth of any such allegations) or
- it is necessary for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against us or you

In addition, we will not carry out any automated decision-making or profiling of you.

12 How and why we share your personal information with third parties

There may be occasions when the School needs to share information with third parties and that where information is shared we will ensure we only share as much information as actually required and will ensure that the third party has appropriate safeguards in place to protect the information which will include entering into GDPR-compliant data processing contracts when information is shared with any service providers.

- In accordance with our legal obligations, we will share information with local authorities 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)

13 International transfers of personal information

We do not normally transfer your information to a country which is outside the United Kingdom. If this were necessary, we will be very careful to make sure that it is safe to transfer your information. We will, for example, look at whether that other country has good data protection laws. If we cannot be sure that it is safe, then we will talk to you about it and make sure that you are happy for us to send your information. As this is not something we normally do and we don't know which country we might need to send your information to, we cannot tell you more about it now but if we want to transfer your information to a different country then we will tell you whether or not we think it is safe and why we have decided that.

14 For how long do we keep your information?

We will only keep your information for as long as is necessary, 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 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. We will anonymise personal information in order to allow us to retain it indefinitely as such information would then no longer count as personal information as it cannot be used to identify any individual.

For more information on how long the School retains personal information please refer to the *Data & Records Retention Policy*, a copy of which can be obtained via the School's Data Protection Lead, details for whom can be found towards the start and end of this notice.

15 What decisions can you make about your information?

You have the following rights:

- to obtain access to, and copies of, the personal information that we hold about you;
- to require us to correct the personal information we hold about you if it is incorrect;
- to require us (in certain circumstances) to erase your personal information;
- to request that we restrict our data processing activities;
- to withdraw consent;
- to request that we provide you or any third party that you identify with a copy of your personal information in a commonly used, machine readable format;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. The school will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits, currently set at one month. However, we may extend this time limit by up to an additional 2 months where this is justified because your request is complex or you have submitted multiple requests at one time.

Should you wish to exercise any of your rights in relation to your personal information as set out above, it would be helpful if such requests were made in writing to the School's Data Protection Lead (Mr Julius Sidwell, Vice Principal). However, any such requests may be made verbally instead of in writing, should that be an individual's preference.

Mr J Sidwell, Vice Principal & Data Protection Lead
New Hall School, The Avenue, Boreham, Chelmsford, Essex CM3 3HS
Email: dataprotectioncompliance@newhallschool.co.uk

16 Further information and guidance

If you have a concern about the way we are collecting or using your personal information, we ask that you raise your concern with us in the first instance.

Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> or the address below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 (local rate) or 01625 545 745.