

Three Counties Academy Trust



Privacy Statement – Alumni Data – FI12(G)

Three Counties Academy Trust (TCAT)

Effective Date: Academic year 2026-2027

Last Reviewed: October 2nd, 2026

1. Introduction

Three Counties Academy Trust, commonly referred to as TCAT, is committed to protecting the privacy and security of personal data. This privacy statement explains how we collect, use, and share **alumni** data across all schools within TCAT in compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

TCAT is the **Data Controller** for the personal data held by our schools unless otherwise stated. Each school within TCAT follows this privacy statement to ensure consistency in data protection practices.

2. What Data We Collect

We collect, store, and process the following categories of alumni data:

- **Personal Information** – Name, title, date of birth, and gender
- **Contact Information** – Home address, email address, phone numbers
- **Education Records** – Attendance dates, academic achievements, and extracurricular activities
- **Career and Further Education Information** – University or college attended, employment details, professional achievements
- **Event Participation Records** – Attendance at alumni events, reunions, and networking activities
- **Fundraising and Donation Records** – Information on donations made to TCAT or associated charitable causes
- **Correspondence Records** – Emails, letters, and other communications with TCAT or its schools
- **Marketing and Communication Preferences** – Consent for receiving newsletters, event invitations, and updates
- **Photographs and Video** – For identification, alumni events, and promotional materials (with consent where required)
- **CCTV Footage** – If alumni visit TCAT schools where CCTV is in operation

3. Why We Collect and Use Alumni Data

We process alumni data under the following lawful bases as defined under UK GDPR:

- **Legitimate Interests (Article 6(1)(f))** – Where processing is necessary for alumni engagement, networking, and fundraising, balanced against individual rights
- **Consent (Article 6(1)(a))** – For activities such as marketing communications, event invitations, and promotional materials
- **Legal Obligation (Article 6(1)(c))** – To maintain records where legally required (e.g., safeguarding or regulatory requests)

Additionally, we may process **special category data** (e.g., health, ethnicity, and SEND data) under **Article 9(2)(b) and (g) UK GDPR**, as processing is necessary for reasons of substantial public interest, safeguarding, or legal obligations.

4. How We Use Alumni Data

We use alumni data for the following purposes:

- To maintain an accurate record of former pupils and their achievements
- To provide alumni engagement opportunities, including networking and reunions
- To communicate updates about TCAT and its schools, including newsletters and invitations to events
- To administer fundraising and charitable donation campaigns
- To provide opportunities for mentoring and professional networking with current pupils and staff
- To request feedback on school development and alumni initiatives
- To manage security and access to school premises, including visitor logs and ID badge processing
- To ensure compliance with legal and safeguarding obligations

5. How We Store and Protect Alumni Data

We take the security of alumni data seriously and implement the following measures:

- **Physical Security** – Secure storage of paper records in locked areas
- **Technical Security** – Encryption, password-protected systems, secure cloud storage
- **Organisational Measures** – Staff training, data protection policies, regular audits to ensure compliance

We only retain alumni data for as long as necessary in line with our **Records Management Policy**, which follows guidance from the **Information and Records Management Society (IRMS) Schools Toolkit**.

- Contact details and engagement records will be retained until an individual opts out or requests deletion
- Financial donation records will be retained for **seven years** in compliance with financial regulations

6. Who We Share Alumni Data With

We only share alumni data when it is lawful and necessary, including with:

- **Event Organisers and Partner Institutions** – For networking and professional development events
- **Marketing and Communication Providers** – Where alumni have opted in to receive updates and event invitations
- **Educational and Research Organisations** – Where involved in alumni tracking and impact studies (anonymised where possible)
- **Law Enforcement Agencies** – If required for legal compliance or safeguarding concerns
- **School Service Providers** – Such as IT systems used for alumni communications and record-keeping

All third parties we share data with must comply with strict data protection agreements.

7. International Data Transfers

We do not routinely transfer alumni data outside the UK. If we do, we ensure appropriate safeguards are in place, such as **UK adequacy decisions** or **Standard Contractual Clauses (SCCs)**.

8. Alumni Rights

Under UK GDPR, alumni have the following rights regarding personal data:

- **Right to Be Informed** – About how we use their data
- **Right of Access** – To request a copy of their personal data
- **Right to Rectification** – To correct inaccurate or incomplete data
- **Right to Erasure ("Right to Be Forgotten")** – In certain circumstances, to request data deletion
- **Right to Restrict Processing** – To limit how data is used
- **Right to Data Portability** – To request data in a transferable format (where applicable)
- **Right to Object** – To processing based on legitimate interests
- **Rights Related to Automated Decision-Making** – We do not use alumni data for automated decisions

To exercise any of these rights, please contact the Data Protection Officer (DPO) (details below).

9. Contact Details

For any questions about this privacy statement or to exercise your rights, please contact:

N Cook Data Protection Officer

on behalf of Three Counties Academy Trust

Schools DPO, c/o PSB jubilee House, Townsend Lane, London, NW9 8TZ

Email: nicola@schoolsdpdpo.com

Tel: 01296 658502

If you have concerns about how your data is handled, you can also contact the **Information Commissioner's Office (ICO)**:

ICO Website: www.ico.org.uk

ICO Helpline: 0303 123 1113

10. Changes to This Privacy Statement

We may update this privacy statement from time to time. Any significant changes will be communicated via our website and school communications.