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**Privacy Statement – Alumni Data – FI12(G)**

**Three Counties Academy Trust (TCAT)**

**Effective Date:** Academic year 2024-2025 **Last Reviewed:** February 6th, 2025

**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 operation3. 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:

**S Smith Information Governance Officer and Data Protection Officer**on behalf of Three Counties Academy Trust  
Herefordshire Council, Plough Lane, Hereford, HR4 0LE  
Email: samsmith@herefordshire.gov.uk  
Tel: 01432 260282

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**](https://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.