

# Privacy Notice – Alumni

## *How we use Alumni Information*

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals working with the school in a voluntary capacity, including Governors.

Twyford Church of England Academies Trust, ("the Trust"/"the School") is the 'Data controller' for the purposes of data protection law.

We have appointed Grow Education Partners Ltd as our data protection officer (DPO) and the responsible contact is Claire Mehegan (see 'Contact us' below).

## *The personal data we process.*

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Personal Information (such as name, date of birth, dates you attended or worked in one or more of our schools)
- Contact details (such as telephone number, email address, postal address)
- Financial Information (such as banking details)
- Information about career and academic achievements
- Closed Circuit Television (CCTV) footage (e.g. if you attend a reunion event)
- Photographs (such as on the website, twitter or for other promotional purposes).

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities, and the Department for Education.

## *Why we collect and use this information*

The purpose of processing this data includes but is not limited to:

- To inform you about events and other things happening in the Trust and its schools
- To assess the quality of our services
- To comply with the law regarding data sharing

## *The lawful basis on which we use this information*

Are defined under data protection legislation and for personally identifiable information are

- Data subject gives consent for one or more specific purposes.
- Processing is necessary to comply with the legal obligations of the controller.
- Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education).

- Processing is necessary for your legitimate interests or the legitimate interests of a third party.

A full breakdown of the information we collect on alumni can be requested by contacting the data protection team whose details can be found in the communication section at the end of this notice.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

### Collecting this information

All former pupils and staff are eligible to be part of our alumni organisation. However this is voluntary, and you can opt out and leave at any point after having joined.

As an alumnus, there is some information which we will need from you to facilitate the services we provide.

Whenever we seek to collect information from you, we make it clear whether the information is integral and what the consequences are if it is not supplied.

### How we store this data

Personal data is stored in accordance with our data protection policy.

Alumni information is held in a secure database and is only used for purposes directly relevant to the work of the alumni organisation.

When your relationship with the Trust has ended, we will retain and dispose of your personal information in accordance with our Data Retention Schedule. A copy of our Data Retention Policy is found here: <https://www.twyfordacademies.org.uk/key-documentation/policies>

### Data sharing

In order for us to legally, effectively and efficiently function we are required to share data with appropriate third parties, including but not limited to:

- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as governor support and IT.
- Our auditors to ensure compliance with our legal obligations.
- Trade Unions and Professional Associations - to enable them to provide the service their members require.
- Professional advisers and consultants- for us to develop our services and best provide our public service.
- Employment & recruitment agencies and future employers to support reference requests
- Police forces, courts, tribunals, security services - to create a secure workplace for all at the Trust and its schools.
- Charities and voluntary organisations

## Transferring data internationally

We may send your information to other countries where:

- we or a company we work with store information on computer servers based overseas; or
- we communicate with you when you are overseas.

We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA.

The UK and countries in the EEA adhere to the requirements of the UK GDPR or the GDPR or have equivalent legislation which confer the same level of protection to your personal data.

From organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.

Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

## Data Protection Rights

Individuals have a right to make a **‘subject access request’** to gain access to personal information that the Trust holds about them.

Parents/carers can make a request with respect to their child’s data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

If you make a subject access request, and if we do hold information about you, we will:

- 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
- NOT provide information where it compromises the privacy of others
- 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.

In most cases, we will respond to subject access requests within 1 month, as required under data protection legislation. However, we are able to extend this period by up to 2 months for complex requests or exceptional circumstances.

We reserve the right to verify the requesters’ identity by asking for Photo ID. If this proves insufficient, then further ID may be required.

## Your Other Rights regarding your Data:

- Withdraw your consent to processing at any time (This only relates to data for which the Trust relies on consent as a lawful basis for processing)
- Ask us to rectify, erase or restrict processing of your personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied
- Prevent the use of your personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest, official authority or legitimate interests
- Request a copy of agreements under which your personal data is transferred outside of the European Economic Area
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect you)
- Request a cease to any processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Submit a complaint to the ICO
- Ask for your personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

The Trust will comply with the Data Protection legislation in regard to dealing with all data requests submitted in any format, although individuals are asked to preferably submit their request in written format to assist with comprehension.

If you would like to exercise any of the rights or requests listed above, please contact Richard Lane, Director of Finance & Operations (email: [rlane@twyfordacademies.org.uk](mailto:rlane@twyfordacademies.org.uk), phone: 020 3301 3189, address: Twyford C of E Academies Trust, Twyford Crescent, London W3 9PP).

We reserve the right to verify the requesters identification by asking for Photo ID. If this proves insufficient then further ID may be required.

#### Data Protection Breaches

If you suspect that your or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction or damage, we ask that you please contact Richard Lane , Director of Finance & Operations ([rlane@twyfordacademies.org.uk](mailto:rlane@twyfordacademies.org.uk) phone 02033013189) and advise us without undue delay.

#### 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 concern about our data processing, please raise this with us in the first instance by contacting Richard Lane , Director of Finance & Operations ([rlane@twyfordacademies.org.uk](mailto:rlane@twyfordacademies.org.uk)).

This complaint may be assessed by our independent Data Protection Officer, Claire Mehegan at [claire.mehegan@london.anglican.org](mailto:claire.mehegan@london.anglican.org), with a final response provided within 30 days.

If you are unhappy with the school's final response you can refer the matter to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

### Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact either our School Data Protection Lead, Richard Lane, Director of Finance & Operations (email: [rlane@twyfordacademies.org.uk](mailto:rlane@twyfordacademies.org.uk), phone: 020 3301 3189) or our independent Data Protection Officer, Claire Mehegan contactable at [claire.mehegan@london.anglican.org](mailto:claire.mehegan@london.anglican.org) or on 020 3837 5149.

### Changes to this Privacy Notice.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.