



## PRIVACY NOTICE ALUMNI

**Responsible person:** Mr Kenneth Evans, Bursar

**Last reviewed:** July 2021

**Next review due:** July 2024

## **Introduction**

You have a legal right to be informed about how St Columba's College and Preparatory School (the College) uses any personal information that we hold about you. To comply with this, we provide a Privacy Notice to you where we are processing your personal data. This Privacy Notice explains how we collect, store and use personal data about you.

## **Who we are?**

St Columba's College and Preparatory School is the Data Controller which means that the College is the organisation which is in charge of your personal information. This Privacy Notice explains how we collect, store and use personal data about alumni of our College. We are the 'data controller' for the purposes of data protection law.

The postal address of the College is St Columba's College, 8-10 King Harry Lane, St Albans, Hertfordshire, AL3 4AW.

## **What this Privacy Notice is for?**

This Privacy Notice is intended to provide information about how the College will use (or "process") personal data about our alumni (referred to in this policy as "alumni").

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the College's obligations to its entire community. (However, the College has a separate Data Protection Policy and Privacy Notice applicable to its employees and other staff.)

This **Privacy Notice** applies alongside any other information the College may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This **Privacy Notice** also applies in addition to the College's other relevant terms and conditions and policies, including:

- any contract between the College and its alumni;
- any policies or notices applicable the handling of personal data;
- the College's policy on taking, storing and using images of children;
- the College's CCTV and/or biometrics policy;
- the College's retention of records policy;
- the College's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the College's IT policies, including its Acceptable Use policy, Social Media policy, eSafety policy, WiFi policy, Remote Working policy and Bring Your Own Device policy.

Anyone who works for, or acts on behalf of, the College (including alumni) will be subject to suitable training and/or policies commensurate with their role.

## Responsibility for data protection

St Columba's College has appointed a Data Protection Lead who will deal with all of your requests and enquiries concerning the College's use of your personal data and who will endeavour to ensure that all personal data is processed in compliance with this notice and Data Protection Law.

If you want to contact us about your personal information, you can contact our Data Protection Lead, Mr Kenneth Evans who is the Bursar. You can speak to him by contacting his PA Mrs Michelle Clinch at [bursarpa@stcolumbascollege.org](mailto:bursarpa@stcolumbascollege.org).

## Why the College needs to process personal data

In order to carry out its ordinary duties to staff, alumni, governors, pupils and parents, the College needs to process a wide range of personal data about individuals (including current and past, pupils or parents) as part of its daily operation.

The College will need to carry out some of this activity in order to fulfil its legal rights, duties or obligations, including to the alumni of the College.

Other uses of personal data will be made in accordance with the College's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data. The College expects that the following uses will fall within that category of its (or its community's) "**legitimate interests**": These are:

- Asking you for financial contributions towards the College, and facilitating this efficiently;
- Analysing the composition of our alumni group to help us decide what events or activities to run; and
- Providing you with marketing communications based on what we think you'll be interested in.

The purpose of processing this data is to help us run the College, including to:

- Enable alumni to be paid for any expenses they have incurred at the College's request;
- Enable appropriate organisational contact (for example, for both internal and external use, including publication on the College's website);
- Help us to build a community around the College;
- Offer enrichment and career development opportunities to current pupils;
- Raise extra money so that we can continue to improve the experience pupils get from College;
- Notify you of alumni events you may be interested in;
- Keep you up to date with College news;
- Marketing purposes and to help us to promote the College;
- Keep you safe and comfortable while attending alumni events;
- Tailor the communications we send to you to ensure that they are up to date and relevant;
- Maintain relationships with alumni and the College's community;
- Make use of names of alumni, including photographic images and videos of alumni engaging in College's activities, on displays within the College, in College's publications, on the College's website and on the College's social media channels (where appropriate); and

- Ensure security of the College's sites (for example, alumni pass, issue of access fobs) and including CCTV in accordance with the College's CCTV policy;

In addition, the College will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, biometrics) The reasons for this will include:

- To safeguard pupils' welfare and provide appropriate pastoral or where necessary, medical care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of events who need to be made aware of dietary or medical needs;
- To run any of its systems that operate on biometric data, such as for security and identification;
- As part of any College or external complaints, disciplinary or investigation process that involves such data; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

When we collect personal information on our forms, we will make it clear whether there is a legal requirement for alumni to provide it and whether there was a legal requirement on the College to collect it. If there is no legal requirement, then we will explain why we need it and what the consequences are if it is not provided.

We only collect and use personal information about alumni when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you;
- Comply with a legal obligation; or
- Carry out a task in the public interest.

Less commonly, we may also use personal information about you where:

- You have given consent to use it in a certain way;
- We need to protect your vital interests (or someone else's interests); or
- We have legitimate interests in processing the data.

To process special category data, we need an additional lawful basis. We will process special category data most commonly where:

- We have your explicit consent;
- The processing is necessary under social security or social protection law;
- We are processing it in the vital interests of an individual; or
- We are providing health care or treatment under the responsibility of a health professional.

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. Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the College's use of your data.

## **Types of personal data processed by the College**

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

- Contact details and copies of identification documents, including names, addresses, telephone numbers, email addresses, and other contact details;
- Date of birth;
- Next of kin and emergency contact numbers;
- Bank account details and other financial information, if you make any payments to the College;
- Details of your qualifications, experience, career and employers since you left the College;
- Details of any professional memberships;
- Details about your time at College including records of your achievements and interests;
- Records of contributions you have made since leaving the College, such as your time, expertise or money;
- Records of how you have engaged with our alumni network, events attended, mailing lists you have signed up to and any other interactions;
- Records associated with Gift Aid claims on donations;
- Information required to manage your attendance at alumni events, including access arrangements and dietary requirements (which could be “special category” personal data which is more sensitive);
- Photographs and videos of participation in College activities;
- CCTV footage captured by the College’s CCTV system; and
- Vehicle details for those who use the College’s car parking facilities.

## **How the College collects data**

We receive personal data from the individual directly. This may be via a form, or simply in the ordinary course of interaction or communication (such as email).

## **Who has access to personal data and with whom does the College share it?**

For the most part, personal data collected by the College will remain within the College and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a ‘need to know’ basis). Some functions, however, are outsourced including e.g. cloud storage/records management, monitoring, mailing. In accordance with Data Protection Law, this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the College’s specific directions.

We do not share information about you with any third party without your consent unless the law, our policies, or the terms of this privacy notice allow us to do so. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Other alumni associations;
- Our local authority;
- Department for Education (DfE);
- Educators and examining bodies;
- Our regulator, the Independent Schools Inspectorate;

- Suppliers and service providers – to enable them to provide the service we have contracted them for;
- Central and local government, e.g. HMRC to meet our accounting and reporting obligations in relation to donations received;
- Our auditors;
- Survey and research organisations, including universities;
- Health and social welfare organisations;
- Professional advisers and consultants;
- Charities and voluntary organisations;
- Police forces, courts, tribunals; and
- Professional bodies.

### **How we store the data and how long we keep it**

The College will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

We create and maintain a personnel file for each alumnus in paper copy and or electronic form on the College's computer system. The information contained in this file is kept secure and is only used for purposes directly relevant to you. We will keep your personal data while you remain involved in our alumni network. We may also keep it beyond this, if necessary, to comply with our legal obligations. Our Retention of Records Policy sets out how long we keep information about alumni. A copy of this document is available on request.

If you have any specific queries about how our retention policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Data Protection Lead. However, please bear in mind that the College will often have lawful and necessary reasons to hold on to some personal data even following such a request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested, we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

### **Transferring data internationally**

Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by following data protection law.

### **Keeping in touch and supporting the College**

The College and Alumni Development will use your contact details to keep you updated about the activities of the College. Should you wish to limit or object to any such use, or would like further information about them, please contact the Data Protection Lead in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. The College is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

## Your rights

You have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us (in certain circumstances) to erase your personal data;
- to request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and
- 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.

Individuals have various rights under Data Protection Law to access and understand their own personal data held and processed by the College, and in some cases ask for it to be erased or amended, or to have it transferred elsewhere, or for the College to stop processing it – but subject to certain exemptions and limitations.

The College will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month, but actually fulfilling more complex or multiple requests, e.g. those involving third party information, may take 1-2 months longer).

Individuals have a right to make a 'subject access request' to gain access to personal information that the College holds about them.

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;
- 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. If you would like to make a request, please contact the Data Protection Lead.

Individuals have certain rights regarding how their personal data is used and kept safe.

You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress;
- Prevent your data being used to send direct marketing;
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing;
- Request the transfer of automated personal data to you or to a third party. We will provide personal data in a structured, commonly used, machine-readable format;

- Where we are processing personal data on the lawful basis of consent, for example when publishing photographs in our brochures, you can withdraw your consent at any time by contacting the Data Protection Lead; and
- Claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, please contact the Data Protection Lead

### **Data accuracy and security**

The College will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals can change or update their communication preferences via their Columban Network account or by contacting the Office of Development and Alumni Relations: [sccnetwork@stcolumbascollege.org](mailto:sccnetwork@stcolumbascollege.org). They must please notify Mrs Catherine Lawson, Director of Communications, Admissions and Development ([lawson.c@stcolumbascollege.org](mailto:lawson.c@stcolumbascollege.org)) of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the College may need to process your data, or who you may contact if you disagree.

The College will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to College systems. Where necessary, alumni will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

### **This Privacy Notice**

The College will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

### **Queries and complaints**

Any comments or queries on this policy should be directed to the Data Protection Lead. If you believe that the College has not complied with this policy or acted otherwise than in accordance with Data Protection Law, you should contact the Data Protection Lead. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the College before involving the regulator.

The address of the ICO is:  
Information Commissioner's Office,  
Wycliffe House,  
Water Lane,  
Wilmslow,  
Cheshire,  
SK9 5AF