

Alumni Privacy Notice

INTRODUCTION

This Privacy Notice is designed to help alumni, friends and supporters understand how and why the School processes your personal information and what we do with that information. It also explains the decisions you can make about your own personal data.

This Notice should be read in conjunction with St Faith's ("the School") Data Protection Policy, available on the School website.

DEFINITIONS

In this Privacy Notice, the following definitions apply:

"Data Protection Legislation" means (i) the General Data Protection Regulation (EU) 2016/679 ("GDPR") and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the United Kingdom and (ii) any successor legislation to the GDPR.

"Data controller", "data subject", "personal data" and "processing" shall have the same meanings as in the Data Protection Legislation.

"Special categories of personal data" shall have the same meaning as in the Data Protection Legislation, namely personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation.

ABOUT ST FAITH'S

Nature of Work: Independent School

Under current Data Protection Legislation, the School is a Data Controller.

ICO Registration Number: Z976867X

The contact details for the School are as follows:

St Faith's School
Trumpington Road
CAMBRIDGE
CB2 8AG

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed Judicium Consulting Limited, as the School's Data Compliance Officer who will deal with all your requests and enquiries concerning the School's uses of your personal data and endeavour to ensure that all personal data is processed in compliance with this policy and current Data Protection Legislation.

The Judicium Consulting Limited can be contacted as follows:

Email: dataservices@judicium.com

Telephone: 0203 326 9174

Address: St Faith's School, Judicium Consulting Limited, 72 Cannon Street, London, EC4N 6AE

HOW DOES THE SCHOOL COLLECT ALUMNI DATA?

The School collects most of its alumni personal data directly from alumni only.

Examples of how we collect your data are:

- Verbal or written information from you
- The Donation Form (online and paper form)
- Online Subscription Form
- Completing forms at the School Office
- From publicly available sources, such as Companies House, social media, the internet, publications and news articles

WHAT PERSONAL DATA DOES THE SCHOOL HOLD?

Examples of the types of personal data from alumni that the School processes include:

- Biographical information (your name, date of birth, dates spent as a pupil at the school)
- Contact details and communication preferences
- Your education history
- Your professional activities and employment
- Information you have publically shared on social media
- Notes from conversations that we have had with you
- Your donation history and payment details only where applicable
- Records of communications and interactions we have had with you
- Your profile and photograph, agreed with you prior to posting on our website
- Your attendance at School events.

WHY DOES THE SCHOOL COLLECT ALUMNI AND OTHER SUPPORTERS' PERSONAL DATA

The Marketing department within St Faith's, may use your data for building and maintaining alumni relations, promoting events, sending news and updates, recruiting alumni volunteers and mentors, making fundraising appeals, and organising fundraising, networking, charitable and other School events.

OUR LEGAL GROUNDS FOR USING YOUR PERSONAL DATA

We rely on the following legal bases for processing your personal data:

- Where it is necessary for the purposes of the School's **legitimate interests**, such as providing education, providing a safe and secure environment, advertising and improving the School, enabling us to enforce our rights, monitoring appropriate use of School IT and communications systems and facilitating the effective operation of the School.

- Where it is necessary in order to perform our obligations under a **contract** with you.
- Where it is necessary for compliance with a **legal obligation** to which the School is subject, such as reporting a concern to Children’s Services, or disclosing your data to third parties such as the Police and Local Authority where we are legally obliged to do so.
- Where it is necessary in order to protect your or someone else’s **vital interests**, for example in an extreme emergency.
- Where it is necessary for the performance of a task carried out in the **public interest**, for example safeguarding and promoting the welfare of children, facilitating the effective operation of the School and for providing education services.

Special categories of personal data need to be treated particularly sensitively and the School therefore has to further justify why it may need to use such data. Our lawful bases for processing these types of data, where applicable, are:

- Where you have given **explicit consent**;
- Where it is necessary to protect yours or someone else’s **vital interests**;
- Where you have already made the data **manifestly public**;
- Where it is necessary for the purposes of a establishing or defending a **legal claim**;
- Where there is a **substantial public interest**;
- Where it is necessary for the **provision of health or social care** or treatment.

WHY DOES THE SCHOOL PROCESS ALUMNI PERSONAL DATA?

The School needs to process third party personal data for a number of reasons, which include:

- To provide educational, career and alumni services to pupils
- To keep interested parties notified about relevant matters relating to the School (such as sports fixtures, exam results, performances and events, guest speakers or other news)
- To market and promote the School and its facilities

CONSENT

On some occasions the School may ask for your consent to use your personal data. You may take back this consent at any time. However, any use the School has made of your information before you withdraw your consent will still be valid.

Please note that there are some circumstances where the School will not be able to accept your withdrawal of consent and we may rely on another justification for processing your personal data. We will inform you if this is the case when responding to your withdrawal of consent.

WHO MIGHT YOUR PERSONAL DATA BE SHARED WITH?

Usually, your personal data will remain within the School and only be used by the people who need to know the information. However, there are some instances where the School will need to share your personal data with other parties. These parties might include:

- The public may have access to your personal data where we share your information (such as name, previous school house) in publications on our website.
- Third party organisations which carry out contracts on behalf of the School (such as a venue holding a School event).

- The School's catering company if we provide food for you at an event and you have dietary requirements.
- The Old Fidelian Society

We will only share your information with other people or organisations when we have a good reason to do so and where the School is assured that your data will be kept securely. In exceptional circumstances, we may need to share it more widely than we would normally, and we will notify you if that is likely to be the case.

TRANSFERRING DATA OUTSIDE THE UK

We may send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may communicate with you by email when you are overseas.

The European Commission has produced a list of countries which have adequate data protection rules and therefore do not need further safeguards in place.

The list is available here https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en#dataprotectionincountriesoutsidetheeu.

If the country that we send your information to is not on the list, or is not a country within the European Economic Area (which means countries in the EU, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal information as there is in the UK. If the School is aware of any data that it intends on sending to countries without adequate data protection, we will inform you.

If you have any questions in relation to the transferring of data to other countries please contact the School's Data Compliance Officer.

YOUR RIGHTS

Individuals have a number of rights under Data Protection Legislation which you can exercise in certain circumstances. These include:

- If the data we have on you is incorrect, you can ask us to correct it;
- You can ask us to delete the information we hold on you, for example when we no longer need the information;
- You can ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use the information, where it came from and what types of people/organisations it has been sent to;
- You can ask the School to restrict the use of your information where it is inaccurate, unlawful, no longer needed or where you have exercised your right to object;
- You can ask the School to send you or another organisation certain types of information about you in a commonly used machine-readable format.

HOW LONG DOES THE SCHOOL PROTECT PERSONAL DATA AND ENSURE IT ACCURACY?

The School takes the security of your personal data seriously. It has internal policies and controls in place to ensure that your personal data is not lost, accidentally destroyed, misused or disclosed, and is accessed only by those who need to know the information for the performance of their duties.

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate. Individuals must please notify the School of any significant changes to information held about them.

HOW LONG DO WE KEEP PERSONAL DATA FOR?

The School will keep your personal data for as long as it needs to according to the purpose for processing. Some information will be kept indefinitely, such as names and dates of attendance at the school.

For more information on retention of your personal data please refer to the School's Data Retention Policy, available on the School website or the contact the School's Data Compliance Officer.

THIS PRIVACY NOTICE

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

QUERIES AND COMPLAINTS

Any comments, queries or complaints in relation to this privacy notice should be directed to the School's Data Compliance Officer using the following contact details:

Email: dataservices@judicium.com

Telephone: 0203 326 9174

Address: St Faith's School, Judicium Consulting Limited, 72 Cannon Street, London, EC4N 6AE

Alternatively, you can contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/> or on 0303 123 1113 although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.