



# **How We Use Your Information Privacy Notice for Alumni**

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**Red Kite Schools Trust**

November 2018

## Alumni Privacy Notice - Key Information

This notice contains the key information about **how** and **why** the Development Office of Chesham Grammar School (the **Academy**) collects your personal information and **what** we do with that information.

The Academy is part of Red Kite Schools Trust (the **Trust**). The Trust operates the Academy and is ultimately responsible for how the Academy handles your personal information.

Personal information is information that identifies you and relates to you. For example, information about your contact details, your education and career information, and photographs of you.

We strongly recommend reading the full version of our alumni privacy notice which is published on the Academy's website and can be found here: <https://www.redkiteschoolstrust.org>

You can also obtain a copy of the full privacy notice by contacting the Academy at Red Kite Schools Trust, Chesham Grammar School, White Hill, Chesham HP5 1BA, or email at [office@redkiteschoolstrust.org](mailto:office@redkiteschoolstrust.org).

The full version includes additional points such as, the rights you have in your information, including what decisions you can make about your information, for how long the school retains your personal information and our legal grounds for using your personal information.

The Development Office's primary reason for using your personal information is to maintain a relationship with you once you have left the school, and to retain a historic record of those who were educated at Chesham Grammar School/Chesham High School/Chesham Technical High School.

We set out below examples of the different ways in which we use your personal information and where that personal information comes from.

- We obtain information about you from alumni data forms which you complete in person or online, or when you visit school, or when you contact us through other methods to ask to join the alumni network.
- We may also use information from your time at school such as sport activities, school events such as assemblies and prizegivings, exhibitions, drama and music productions or other school activities.
- We may have photographs or videos of you during your time at school that are used on social media and on the school website. These may be used to show what we do here at school, and to advertise the school, as well as to share the history of the school with our community.
- We will send you information through the alumni newsletter and other communications about what is happening at the school via post or as per your communication preferences. For example, information about reunions, events, fundraising and other activities in association with the school.

- If you kindly support the school financially by making a donation to our charitable Development Trust, then we will process the financial information you give us and update you as to the use of your gift.
- We may send you information about opportunities to support current students in the careers and enterprise curriculum.

In some situations we may need to share your information with third parties. For example, we may use third party "cloud computing" services to store information rather than the information being stored on hard drives located on the academy site.

You have the following rights regarding your information:

- Rectification of information held;
- Access to information held;
- Deletion of information in certain circumstances;
- Portability - the transfer of information to you or a third party;
- Restriction of use of information; and
- The right to object to the use of information in certain circumstances.

The Data Protection Officer monitors and advises on the Trust's data protection compliance. The Trust Data Protection Officer, N Cook, can be contacted on 01295 383180 or [DPO@learningtrust.net](mailto:DPO@learningtrust.net).

If you have any questions about how we use your personal information please contact the Trust Chief Operating Officer at [office@redkiteschoolstrust.org](mailto:office@redkiteschoolstrust.org) or on 01494 782854.

## Alumni Privacy Notice

### Introduction

This notice is to help you understand **how** and **why** the Development Office of Chesham Grammar School (the **Academy**) collects personal information about you and **what** we do with that information. It also explains the decisions that you can make about your own information.

The **Academy** is part of White Hill Schools Trust (the **Trust**). The Trust operates the school and is ultimately responsible for how the school handles your personal information.

The Trust Data Protection Officer (N Cook) can be contacted on 01295 383180 or at DPO@learningtrust.net. The Data Protection Officer monitors and advises on the Trust's data protection compliance. If you have any questions about how we use your personal information please contact the Trust Chief Operating Officer at office@redkiteschoolstrust.org or 01494 782854.

### What is "personal information"?

Personal information is information that identifies you as an individual and relates to you. This includes contact details, education information, and career information if you have given this to us.

### Our legal grounds for using your information

This section contains information about the legal bases that we are relying on when handling your information.

The two tables below contain a general description of the different legal bases but we have also used a colour code system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 18 below.

#### Legal obligation ("LO")

Where the Academy needs to use information in order to comply with a legal obligation, for example if we need to disclose information to third parties such as local authorities where legally obliged to do so, for example in order to process a financial transaction such as a generous gift to the charitable trust.

#### Necessary for contract ("CT")

We will need to use your information in order to perform our obligations under any contract we have with you, for example, if you buy tickets for an event.

#### Vital interests ("VI")

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

#### Performance of a task carried out in the public interest ("PI")

The following are examples of when we use your information to perform tasks in the public interest:

- facilitating the efficient operation of the school's alumni activities such as mentoring;
- archiving in the public interest; and
- ensuring that we comply with all of our legal obligations.

#### Legitimate interests ("LI")

This means that the Academy is using your information when this is necessary for the Academy's legitimate interests except when your interests and fundamental rights override our legitimate interests.

For example, we have a legitimate interest in using your information to:

- promote the Academy's alumni activities including fundraising; and
- using your personal information to administer our events.

### **How and why does the academy trust collect and use personal information?**

We set out below examples of the different ways in which we use personal information and where this personal information comes from.

1. The Academy's primary reason for using your personal information is to maintain a relationship with you once you have left the school, and to retain a historic record of those who were educated at Chesham Grammar School/Chesham High School - **PI, LI**.
2. We obtain information about you from alumni data forms you complete in person or online, when you visit school, or when you contact us through other methods to ask to join the alumni network - **LI**.
3. We may use information about you from your time at school, or information you publish in the public domain on social media, to confirm that you are a former student eligible to join our alumni group. This may include information such as sports records, achievements, or reunion records - **LI**.
4. We may have photographs or videos of you during your time at school that are used on social media and on the school website. These may be used to show what we do here at school and to advertise the school - **LI**.
5. We may use photographs to share the history of the school with our community - **PI**.
6. We may use information about you that was well known, or publically available, during your time at school, such as, sports records, schools trips, performances, art or student leadership roles if we need this for historical purposes. For example, if we consider the information might be useful to make a reunion display about the school or if someone wanted to write a book about the school - **LI, PI**.

7. We may use information about you that was well known, or publically available, during your time at school, such as, sports records, school trips, performances, art, public exam achievements, or student leadership roles if we need this for internal information purposes. For example, if we consider the information might be useful to make a careers or subject area display for current students and parents.
8. We may publish or post on our social media or alumni newsletters information about you that is in the public domain, for example, news in the press about your career or achievements, and we may retweet or share information about you that has already appeared on Twitter, Facebook or LinkedIn, or in the press - **LI**.
9. We will send you information through the alumni newsletter and other communications about what is happening at the school via post or as per your communication preferences. For example, information about reunions, events, fundraising and other activities in association with the school - **LI**.
10. If you kindly support the school financially by making a donation to our charitable Development Trust, then we will process the financial information you give us and update you about the use of your gift - **LI, PI**.
11. If you make a donation of a substantial value, we may need to verify your identity and/or carry out financial due diligence on you. This may involve taking and retaining copies of your identification documents and obtaining your personal information from the following sources: internet search engines, 192.com, the Charity Commission, Zoopla, Business Week and related media articles. This is to comply with our legal obligations - **LI, LO**.
12. We will use information about your Gift Aid status if applicable - **LO**.
13. We may send you information about opportunities to support current students in the careers and enterprise curriculum - **PI**.
14. If you buy things from the Academy such as tickets for events or sportswear, we may hold financial information about you - **CT, LI**.

#### Sharing personal information with third parties

15. Occasionally we may use external organisations to assist the Academy in fulfilling its obligations and to help run the Academy properly (e.g. our accountants and lawyers). We will share your information with them if this is relevant to their work, if for example you have given us your financial information for the purposes of a donation - **PI, LI**.
16. We will share information with HMRC in connection with Gift Aid claims - **LO**.
17. On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders - **PI, LI**.
18. We will need to share information if there is an emergency, for example, if you are hurt whilst on School premises or at one of our events - **PI, LI, V**.

We sometimes use contractors to handle personal information on our behalf, for example:

- IT consultants who might access information about you when checking the security of our IT network;
- Third party secure "cloud computing" services to store information rather than the information being stored on hard drives located on the academy site.

### **Consent**

We may ask for your consent to use your information in certain ways as an alternative to relying on any of the bases in the table above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on our legitimate interests or it being in the public interest.

If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. If you would like to withdraw any consent given please contact the Trust Data Protection Officer N Cook on 01295 383180 or [DPO@learningtrust.net](mailto:DPO@learningtrust.net) or the Trust Chief Operating Officer at [office@redkiteschoolstrust.org](mailto:office@redkiteschoolstrust.org) or on 01494 782854.

### **Sending information to countries outside the EU**

We store some of your information on cloud computer storage currently based in the USA through a UK-based organisation. We rely on the protection given to this personal data under the EU-US Privacy Shield Framework.

If we transfer your personal information to countries outside of the EU (which may not have data protection laws to the same standard) in other circumstances, we will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place please contact the Trust Data Protection Manager or the school Chief Operating Officer.

### **For how long do we keep your information?**

We have an ongoing relationship with you and we would like you to be involved with the Academy for many years to come. For this reason, the Development Office keeps the majority of the personal information it holds about you indefinitely. For example, we keep your contact details so that we can continue to stay in touch with you. Similarly we will retain information about your involvement with the Academy as this helps us tailor our communications to you both now and in future.

We will also need to keep a record if you tell us that you do not want to hear from us anymore, so that we do not inadvertently add you to our mailing list in the future.

We can also keep information about you for a very long time or even indefinitely if we are retaining it for archiving purposes (this is known as "archiving in the public interest" under data protection law). For example, we keep old photographs so that we have a record of what the School was like in the past.

The Academy will also keep information for a long time as part of its wider legal and regulatory obligations, even if that information is no longer needed for marketing, development or fundraising purposes. This is especially relevant to former staff, pupils and parents. For more information on how personal information is used by the Academy more widely please contact the Chief Operating Officer.

Although the Development Office keeps the majority of your personal information for a very long time, there are some exceptions to this. Further information can be found in our Information and Records Retention Policy.

### **What decisions can you make about your information?**

From May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- **Rectification:** if information is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent (please see "Our legal grounds for using your information above"); and (c) the information is being processed by us on computer.
- **Restriction:** our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Object:** you may object to us using your information where:
  - a) we are using it for direct marketing purposes (e.g. to send you emails about our alumni events);
  - b) the legal ground on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our legal grounds for using your information" above; and
  - c) if we ever use your information for scientific or historical research purposes or statistical purposes.

The Chief Operating Officer can give you more information about your data protection rights.

## Further information and guidance

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

This notice is to explain how we use your personal information. The Chief Operating Officer can answer any questions which you may have, or you can contact the Development Director about any alumni matters at [development@cheshamgrammar.org](mailto:development@cheshamgrammar.org).

Please speak to the Chief Operating Officer if:

- you would like to exercise any of your data protection rights mentioned above; or
- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

The Academy has a Data Protection Officer N Cook who can be contacted on 01295 383180 or [DPO@learningtrust.net](mailto:DPO@learningtrust.net). The Data Protection Officer monitors and advises on the Academy's data protection compliance.

You have a right to lodge a complaint with a data protection supervisory authority. The supervisory authority in the UK is the Information Commissioner's Office - [ico.org.uk](http://ico.org.uk). If you do have any concerns about how we have handled your personal information we would kindly ask that you contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.