

Privacy Notice - Alumni

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1. Introduction

- 1.1. Under UK data protection law, individuals have a right to be informed about how our 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.
- 1.2. This privacy notice explains how we collect, store and use personal data about **alumni of the school**.
- 1.3. We, Isleworth & Syon School (Ridgeway Road TW7 5LJ, school@isleworthsyon.org) are the 'data controller' for the purposes of UK data protection law.

2. The Personal Data We Hold

- 2.1. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:
 - Name
 - Contact details
 - Details about your time at the school, including dates, records of your achievements and interests
 - Your exit routes from leaving us, including information such as universities, jobs and occupations
 - Information about any bursaries or scholarships you have received
 - Records of contributions you have made to the school since leaving, such as your time, expertise or money
 - Records of how you have engaged with our alumni network, including emails you have opened, events attended, mailing lists you have signed up to and any other interactions
 - Your involvement with us since leaving the school e.g. if you carry out mentoring of current students or volunteering for the school
 - Attendance at school events
 - Records of any donations
 - Information from articles in the media and that are shared publicly on social media platforms

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- Copies of correspondence
 - Information about your use of our information and communications systems, equipment and facilities (e.g. school computers)
 - Any disability which you may have so that we may make reasonable adjustments for you

2.2. We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Photographs of your time at the school
- Information required to manage your attendance at alumni events, including access arrangements and dietary requirements

2.3. We may also hold data about you that we have received from other organisations, including other schools and local authorities.

3. Why We Use This Data

3.1. We collect and use the data listed above to:

- Help us build a community around the school
- To keep you informed about events and activities and in relation to your attendance at those events
- Offer enrichment and career development opportunities to current pupils
- Raise extra money so that we can continue to improve the experience pupils get from the school
- Notify you of alumni events you may be interested in
- Keep you up to date with school news
- Help us promote the school
- Keep you safe and comfortable while attending alumni events
- Tailor the communications we send to you, to make sure they are appropriate and relevant
- Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely
- Meet legal requirements placed upon us

3.2. We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for any other reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

3.3. Please note that we may process your personal information without your knowledge or consent in compliance with the above rules where this is required or permitted by law.

3.4. USE OF YOUR PERSONAL DATA FOR MARKETING PURPOSES

3.4.1. Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

3.4.2. You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by selecting the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.5. USE OF YOUR PERSONAL DATA IN AUTOMATED DECISION-MAKING AND PROFILING

We do not currently process any alumni personal data through automated decision-making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

3.6. USE OF YOUR PERSONAL DATA FOR FILTERING AND MONITORING PURPOSES

While you are in our school, we may monitor your use of our information and communications systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety, and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

4. Our Lawful Basis For Using This Data

4.1. Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

- For the purposes of 3.4, 3.5 and 3.6, in accordance with the 'public task' basis - we need to process data to fulfil our statutory function as a school.
- For the purposes of 3.4, 3.5 and 3.6 in accordance with the 'legal obligation' basis - we need to process data to meet our responsibilities under law
- For the purposes of 3.4, 3.5 and 3.6 in accordance with the 'consent' basis - we will obtain consent from you to use your personal data
- For the purposes of 3.4, 3.5 and 3.6 in accordance with the 'contract' basis - we need to process personal data to fulfil a contract with you or to help you enter into a contract with us
- For the purposes of 3.4, 3.5 and 3.6 in accordance with the 'legitimate interests' basis - where there's a minimal privacy impact and we have a compelling reason

4.2. 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 would go about withdrawing consent if you wish to do so.

4.3. OUR BASIS FOR USING SPECIAL CATEGORY DATA

4.3.1. For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

4.3.2. For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting This Data

5.1. We will only collect and use your personal information when the law allows us to, as detailed above in section 4 of this notice. While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

5.2. Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

5.3. Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities

- Government departments or agencies
- Police forces, courts or tribunals
- Other schools or trusts
- Department for Education

6. How We Store This Data

- 6.1.** We keep personal information about you while you remain involved in our alumni network. We may also keep it beyond this if this is necessary to comply with our legal obligations or to meet our regulatory requirements. Our data retention and destruction policy sets out how long we keep information about alumni.
- 6.2.** We have put in place appropriate security measures to prevent your personal information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- 6.3.** We will dispose of your personal data securely when we no longer have a legal requirement to retain it.

7. Who We Share Data With

- 7.1.** We do not share information about you with any third party without consent unless the law and our policies allow us to do so.
- 7.2.** Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:
- Our local authority (London Borough of Hounslow) - to meet our legal obligations to share certain information with it, such as safeguarding concerns
 - Government departments or agencies
 - Department for Education
 - Our regulator, Ofsted
 - Suppliers and service providers: e.g. catering, HR, filtering and monitoring
 - Financial organisations
 - Our auditors
 - Survey and research organisations
 - Health authorities
 - Security organisations
 - Health and social welfare organisations
 - Professional advisers and consultants
 - Charities and voluntary organisations
 - Police forces, courts and tribunals - to meet our legal obligations to share certain information with it, such as safeguarding concerns

7.3. TRANSFERRING DATA INTERNATIONALLY

We do not normally transfer your information to a country which is outside the United Kingdom. If this were necessary, we will be very careful to make sure that it is safe to transfer your information. We will, for example, look at whether that other country has good data protection laws. If we cannot be sure that it is safe, then we will talk to you about it and make sure that you are happy for us to send your information. As this is not something we normally do and we don't know which country we might need to send your information to, we cannot tell you more about it now but if we want to transfer your information to a different country then we will tell you whether or not we think it is safe and why we have decided that.

8. Your Rights

8.1. HOW TO ACCESS PERSONAL INFORMATION THAT WE HOLD ABOUT YOU

You have a right to make a 'subject access request' to gain access to personal information that we hold about you. If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it
- Tell you why we are holding it, how we are 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

8.2. You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

8.3. If you would like to make a request, please contact us (see 'Contact us' below).

8.4. YOUR OTHER RIGHTS REGARDING YOUR DATA

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data where it is likely to cause, or is causing damage or distress
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office if you feel we have not used your information in the right way
- Claim compensation for damages caused by a breach of the data protection regulations

8.5. We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent

8.6. See information on types of lawful basis in section 4 of this privacy notice.

8.7. To exercise any of these rights, please contact us (see 'Contact Us' below).

9. Complaints

9.1. We take any complaints about our collection and use of personal information very seriously.

9.2. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concerns about our data processing, please raise this with us in the first instance. You can make a complaint to us at any time by contacting the school's Data Protection Officer - listed on the Key Contacts Section of the school website: <https://www.isleworthsyon.org/about/staff/>.

9.3. Alternatively, you can make a complaint at any time to the Information Commissioner's Office:

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

10. Contact Us

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, the school's Data Protection Officer - listed on the Key Contacts Section of the school website: <https://www.isleworthsyon.org/about/staff/>.