



Privacy Notice for Alumni

Introduction

This privacy notice is intended to provide information about how we will use (or "process") Personal Data about our alumni for the purposes of maintaining a lasting, life-long relationship with the Stephen Perse Foundation (the **Foundation**). For information about how the Foundation uses your Personal Data more widely (for example, in relation to being a current parent, a pupil or in relation to employment) please see the Foundation [website](#).

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how your data is used and to explain how you can control the way in which the Foundation uses that data and what actions you can take if you would like to change the way in which your data is being used.

This Privacy Notice applies alongside any other information the Foundation 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 Foundation's other relevant terms and conditions and policies, including our Data Protection Policy, Information and Records Retention Policy and IT policies.

If you have any questions about this notice please contact the Development Office - development@stephenperse.com.

Who we are

The Stephen Perse Foundation Alumni Office exists to maintain and grow a lifelong relationship between the Foundation and its alumni, who include past students and past parents. It aims to foster support for and pride in all that the Foundation seeks to achieve and the personal achievements of the Foundation's alumni who are an inspiration to our students. The Alumni Office forms part of the Development Department of the Foundation which has responsibility for alumni relations, events and all aspects of fundraising. The Foundation relies on charitable support to ensure that the world class education that we offer can be shared as widely as possible through offering bursaries, scholarships, outreach and community projects and other innovative programmes.

What is "personal information"?

Personal information is information that identifies you as an individual and relates to you.

This includes your contact details, education history, employment and interests. We will also keep a record of our communications with you.

Our legal bases 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:

Legitimate interests ("LI")

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

Specifically, the Foundation has a legitimate interest in:

- protecting the Foundation's reputation;
- facilitating the efficient operation of the Foundation; and
- ensuring that all relevant legal obligations of the Foundation are complied with.

In addition, your personal information may be processed for the legitimate interests of others.

Legal obligation ("LO")

Where the Foundation needs to use your information in order to comply with a legal obligation, for example to provide certain details to HMRC when processing a Gift Aid donation. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Performance of a task carried out in the public interest (or carrying out public tasks) ("PI")

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

- facilitating the efficient operation of the Foundation; and
- ensuring that we comply with all of our legal obligations.

The Foundation must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

Substantial public interest ("SP")

The Foundation is also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above.

Legal claims ("LC")

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers.

How and why does the Foundation 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. The letters highlighted in different colours below refer to the legal bases we are relying on. Please see the section above for an explanation.

The personal details held about you will be used only by the Foundation to send you newsletters and information on activities, events and fundraising appeals, specifically in support of the work of the Foundation, which we think will be of interest to you and which you have said you are happy to receive. We will update and correct your data when you ask us to.

1. Sending publications (e.g. newsletters and updates about the Foundation) - **LI**;
2. Conducting surveys, including research on when and whether particular donations or funding appeals may be of interest - **LI**;
3. Preparing tailored proposals, appeals and requests for donations - **LI**;
4. Sending details of volunteering opportunities - **LI, PI**;
5. Invitations to alumni and other Foundation events - **LI**;
6. Event planning - we may create short biographies of individuals who are attending our events or meetings as part of the briefing for the hosts of the event and to help our understanding about the people we are engaging with - **LI**;
7. The promotion of other opportunities and services (e.g. offers and opportunities available through the Foundation's network of alumni groups) - **LI**;
8. Research in order to improve its understanding of its alumni and supporters, inform its fundraising strategy and target its communications more effectively - **LI**;
9. Internal record keeping, including the management of any feedback or complaints - **LI**; and
10. Administrative purposes (e.g. in order to process donations or to administer events) - **LI**.

Communications may be sent by post, telephone or electronic means (principally email), depending on the contact details we hold, and the preferences expressed about the types of communications used. In addition to our general principle of adopting legitimate interest as the legal basis for data processing, the Privacy and Electronic Communications Regulations 2003 (PECR) apply to electronic fundraising communications.

More than one basis

In some cases we will rely on more than one basis for a particular use of your information - for example, in relation to volunteering opportunities. In addition, the basis that we will rely on for a particular purpose may vary depending on the circumstances or we may move from one of the legal bases listed above to another as circumstances change. For example, we may rely on legitimate interests to contact you in relation to an event or fundraising appeal and then rely on legal obligation to process any donation you have made.

Types of personal data processed by the Foundation

Based on information which you provide to us and, in some cases, publicly available information we may record:

- Biographical information, including your name, gender and date of birth
- Your contact details and communication preferences
- Your education history including information about your time at the Foundation and the dates you attended
- Your professional activities and employment
- Your interests
- Your family details and network
- Information you have publicly shared on social media
- Your relationships with other Foundation alumni including your year group
- Your donation history and Gift Aid declaration (if required)
- Records of communications and interactions we have had with you
- Your attendance at Foundation events
- Whether you are a trustee of a grant-giving charity or have previously donated to similar charities, or raised funds for charitable purposes, in addition to your interest in Education
- Case studies and photographs (for which your permission will always be sought)

We do not collect or store any credit/debit card details.

How the Foundation collects personal data

Generally, the Foundation receives Personal Data from the individual directly. A significant proportion of the information we hold on alumni comes from them (for example, by filling in a form, or by corresponding with us by telephone, email or otherwise). Some pupil data held in the Foundation's pupil database will be transferred to the Foundation's alumni database. However in some cases

In some cases, we may supplement the information you have given us with data from elsewhere. Examples include adding demographic data to our alumni information and improving or correcting contact details. Sources of data could include information gathered from publicly available sources – for example, Companies House, the Electoral Register and the media/social media – to help us to understand more about you as an individual and your ability to support the Foundation. Any research we undertake is to improve the Foundation's understanding of its alumni to help inform its fundraising strategy and target its communications more effectively. This ensures that any approaches and communications are tailored and appropriate to individual interests and preferences.

Who has access to the personal data and who we share it with

For the most part, Personal Data collected by the Foundation will remain within the Foundation and will be processed by appropriate individuals only on a 'need to know' basis. Occasionally, the Foundation will need to share personal information relating to its community with third parties, such as professional advisers and specialist service providers (e.g. mailing houses, fundraising consultants). Where third parties are engaged they will be required to confirm their compliance with Data Protection Law.

The Foundation may also be required to share your data with third parties where required to do so by law. For example, if you Gift Aid a donation, then we are required to tell HMRC the name, address and postcode of the donor and the date and amount of the donation.

We do not sell to or swap any of our data with third party organisations and do not permit our agents to provide our data to third parties.

Sending information to other countries

In certain circumstances, 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 when we store your information on cloud computer storage based overseas or communicate with you when you are overseas (for example, if you live in another country).

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found [here](#).

If the country that we are sending your information to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal information as there is in the UK, although we will endeavour to ensure that it is kept secure and handled according to data protection laws.

We can 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 Development Office.

For how long do we keep your information?

Relationships between alumni and a school are often life-long relationships, and so we expect to keep your data for as long as that relationship exists.

Should you wish to limit or object to our use of your Personal Data, or would like further information, please contact the Development Office. However, the Foundation may need to retain some of your details (not least to ensure that no more communications are sent to a particular address, email or telephone number, or to you at all).

What decisions can you make about your information?

Since 25 May 2018, data protection legislation has given you a number of rights regarding your information. Some of these were new rights whilst others were built on your previous rights. Your rights are as follows:

- **Rectification:** if information the Foundation holds about you 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

or contract (please see "Our legal bases for using your information" above); and (c) the information is being processed by us on a 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 the Foundation alumni newsletters);
 - b. the legal basis 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 bases for using your information" above; and
 - c. we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of you at a Foundation event for historical reasons.

Any individual wishing to access, erase, restrict processing, obtain, object or amend their personal data, should put their request in writing to the Development Office.

The Foundation 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 one month in the case of requests for access to information. The Foundation will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, the Foundation may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.

You should be aware that certain types of data are exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege.

Data accuracy and security

The Foundation will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. You should notify the Development Office of any significant changes to important information, such as contact details, held about you.

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

The Foundation will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies concerning the use of technology and devices, and access to school systems. All staff and governors will be made aware of these policies and their duties under Data Protection Law and receive relevant training, if necessary.

This Policy

The Foundation 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 reasonably practicable.

Further information and guidance

Any comments or queries on this policy should be directed to the Development Office.

If you consider we have not complied with this policy or acted otherwise than in accordance with Data Protection Law, you should notify the Development Office. You can also contact the Information Commissioner's Office (**ICO**) - ico.org.uk - although the ICO recommends that steps are taken to resolve the matter with us before involving them.

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