

TITLE: ALET Alumni Privacy Policy	REF: GOV005.7	VERSION:
APPROVAL BODY: Policy Committee	DATE: 01/02/2022	REVIEW DATE: 01/02/2023
LEAD PERSON: Data Protection Officer		
VERSION	REVIEWER/APPROVAL	REVIEW NOTES
1.		New Policy

#### ALET ALUMNI PRIVACY POLICY

#### 1. Introduction

Under data protection laws, individuals have a right to be informed about how our trust 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.

This privacy notice explains how we collect, store, and use personal data about **individuals who attended our schools**.

We, Activate Learning Education Trust, Oxpens Road, Oxford OX1 1SA 01865 551025, are the 'data controller' for the purposes of data protection law as defined by the UK General Data Protection Regulation and Data Protection Act 2018.

Our data protection officer is Heledd Walker, Head of Governance and Compliance (see 'Contact us' below).

## 2. The personal data we hold

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

- > Personal information (e.g., name, date of birth, contact details, address, marital status, gender, next of kin details, Identification information, equalities information)
- > Destination data (e.g., education and work details after leaving our schools)
- > Contact preferences (e.g. consent to marketing information)

#### 3. Why we use this data

We use the data listed above to:

- a) Track student destinations (for monitoring success and reporting to the Local Authority);
- b) Help us build a community around the school;
- c) Offer enrichment and career development opportunities to current pupils
- d) Raise extra money so that we can continue to improve the experience pupils get from the school
- e) Notify you of alumni events you may be interested in (where you have given consent for us to do so)
- f) Keep you up to date with school news (where you have given consent for us to do so)
- g) Help us promote the school

# 3.1 Use of your personal data in automated decision making and profiling

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

# 4. Our lawful basis for using this data

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

- > Legal obligation' basis we need to process data to meet our responsibilities under law e.g., Destinations monitoring and reporting.
- ➤ Legitimate interest basis where there's a minimal privacy impact and we have a compelling reason. You have the right to ask us to stop processing your information this way, either by using the unsubscribe option, or by contacting the Data Protection Officer (details below)
  - e.g., To help us build a community around the schools.
- > Consent basis we only process this data with your consent
  - e.g., Marketing and newsletters.

We do not collect or store any information about you which would constitute 'special category' data under data protection legislation.

# 5. Collecting this data

The information which we will use for the purposes of alumni relations will be collected during your time at our schools and retained after you leave. We will use this data to contact you to gather destination information should you be willing to provide it.

#### 6. How we store this data

We keep personal information about you beyond your attendance at our school. Our record retention schedule and records management policy set out how long we keep information about you.

We will retain information about you for the purposes of alumni relations until

#### 7. Who we share data with

Where it is legally required, or necessary (and it complies with data protection law), we routinely share personal information about you with:

- ➤ Our local authorities to meet our legal obligations to share certain information with it, such as destinations monitoring
- > External software suppliers to store information externally and manage mailing lists.

# 8. Your rights

## 8.1 How to access personal information that we hold about you

Under the data protection regulation, you have the right to request access to their personal information that we hold about you, this would be done via a subject access request.

You have the right to:

- > Submit a subject access request.
- > Being informed of the identity of the controller, the reasons for processing their personal data and other relevant information necessary to ensure the fair and transparent processing of personal data.

- > Object to processing of personal data that is likely to cause or is causing damage or distress.
- > Prevent processing for the purpose of direct marketing.
- > Object to decisions being taken by automated means.
- > In certain circumstances, have inaccurate personal data, rectified, blocked, erased, and destroyed.
- > Claim compensation for damages caused by a breach of the data protection regulation.

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 us DPO@alet.org.uk.

# 9. Complaints

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

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance via <a href="mailto:DPO@alet.org.uk">DPO@alet.org.uk</a>.

If you feel that your complaint is not adequately resolved, you can make a complaint to the Information Commissioner's Office:

- > Report a concern online at <a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a>
- > 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, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Our data protection officer is:

> Heledd Walker <a href="DPO@alet.org.uk">DPO@alet.org.uk</a>