

# Privacy notice for Alumni

# St Peter's School, York

May 2025

(Next review Summer term 2027)

This privacy notice describes how we collect and use personal information about former pupils ("alumni"), in accordance with the UK General Data Protection Regulation (UK GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

# Who Collects This Information

St Peter's York is a "data controller." This means that we are responsible for deciding how we hold and use personal information about former pupils.

We may collect, store and use the following categories of personal information about you:

# Categories of Alumni Information We Collect, Process, Hold and Share

- Personal information such as name, pupil number, date of birth, gender and contact information;
- Membership of academic and boarding houses, and extracurricular groups;
- Images of pupils engaging in school activities;
- Information about your educational destinations after your time at St Peter's School;
- Information about major events, achievements and other news about you that you choose to share with us.
- Information about donations you choose to make to the school, including bank details if necessary to process the donation.

## **Collecting this Information**

Some of the information above will be transferred to the Alumni Department of St Peter's School to allow the school to remain in contact with you after you leave the school. Other information may be collected should you choose to share it with us directly, or via one of our social media platforms.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

#### How We Use Your Personal Information

We hold pupil data and use it:

- To allow the school to remain in touch with you for the purposes of sharing news with you about the school and your fellow classmates.
- To make you aware of events of interest to alumni.
- To help the school with fundraising events and to track the effectiveness of our fundraising campaigns through research, tracking of relationships, donation history, etc.
- To make use of photographic images of pupils in school publications, on the school website and (where appropriate) on the school's social media channels in accordance with the School's policy on taking, storing and using images of children;

# Historical Archives

In some notable circumstances, information about pupils is judged to be worth preserving in our historical archives for future generations to be able to view. Please refer to the school's Archives Policy for more information on how information is chosen for these purposes and how it is stored.

### The Lawful Basis on which we use this Information

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Legitimate Interests: Collection of some of your data in order to allow you to be contacted by the Alumni department for events and fundraising is done using the Legitimate Interests legal grounds. You have a legal right to object to this sharing should you wish. For more information please contact the school's Data Protection Officer, whose details appear at the end of this document.
- Contract: the processing is necessary for a contract with the individual;

We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

#### **Sharing Data**

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless we are legally required to do so.

We share alumni information with:

- Third party companies for the purposes of maintaining our Alumni Databases.
- Companies that produce and send you our newsletters and other publications.
- Organisations set up to help establish and maintain relationships with the School community, such as the Old Peterite Association and School Parent and Teacher committees.

We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Finally, in accordance with Data Protection Law, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions. The School may use some products or services (or parts of them) that may behosted/stored on the cloud or servers operated outside the European Economic Area ("EEA"). Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for the data we hold. Our service providers operate data protection measures at standards which are compliant with the requirements of and standards expected under UK GDPR.

#### **Retention Periods**

Except as otherwise permitted or required by applicable law or regulation, the School only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Information in our Alumni database will normally be stored until you have reached the age of 90 years of age, are deceased, or have requested the deletion of your data.

Information in the Historic Archives, including your presence on the official school roll, may be retained indefinitely.

Information about how we retain information can be found in our Data Retention policy.

#### **Security**

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way).

# **Requesting Access to your Personal Data**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **Right to Withdraw Consent**

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### <u>Contact</u>

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with our Data Manager in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolve by our Data Manager, then you can contact the DPO on the details below:

Judicium Consulting Limited 5<sup>th</sup> Floor, 98 Theobalds Road London, WC1X 8WB Email: dataservices@judicium.com Web: www.judiciumeducation.co.uk Lead Contact: Craig Stilwell You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at https://ico.org.uk/concerns.

## Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.