THE GORDON FOUNDATION

Privacy Notice (How we use alumni, friends and supporters information)

Introduction

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' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **alumni**, **friends and supporters of the school**.

Gordon's School Academy Trust and The Gordon Foundation are the Data Controllers for the purposes of UK data protection law.

Our data protection officer is Josephine Boorman (see 'Contact us' below)

The personal data we hold

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 records of your achievements and interests
- 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
- Bank details and other financial information, if you make any payments to the school
- Records associated with Gift Aid claims on donations
- Post-School studies, qualifications and occupation
- Technical information, including your login information and usage of the website

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, networking or fundraising events, including access arrangements and dietary requirements

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

On occasion, we augment the data we hold from publicly available data.

Why we collect and use this information

We use the data listed above to:

- a) Help us build a community around the school
- b) Keep you informed of events and activities
- c) Offer enrichment and career development opportunities to current students
- d) Raise extra money so that we can continue to improve the experience students get from the school
- e) Keep you up to date with school news
- f) Help us promote the school
- g) Keep you safe and comfortable while attending events
- h) Conducting surveys following events and publications
- i) Administrative purposes (eg processing event attendance requests or donations)
- j) Tailor the communications we send to you, to ensure they are appropriate and relevant

Use of your personal data for marketing purposes

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.

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

The lawful basis on which we process this information

We only collect and use your personal data when the law allows us to. Most commonly, we process it where we have obtained explicit consent to use it in a certain way, and where we have legitimate interests in processing the data.

Where we have obtained consent, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how to withdraw it.

Where we have legitimate interests in processing your data, we will carry out a 'balancing test' to make sure our processing does not infringe your interests, rights and freedoms. We will only use the data in ways that you would reasonably expect.

The legitimate interests we have are:

- Asking you for financial contributions towards the school, and facilitating this efficiently
- Analysing the composition of our alumni group to help us decide what events or activities to run
- Providing you with marketing communications based on what we think you'll be interested in

If we require a membership fee or to sign a contract for you to join your alumni, friends or supporters network, we will also use your data in order to fulfil the terms of our contract with you. In addition, we may process your personal data in order to comply with our legal obligations, such as our accounting and reporting requirements in relation to any donations received, and complying with our duties under equality legislation.

Less commonly, we may process alumni personal data in situations where:

- We need it to perform an official task in the public interest
- We need to protect someone's vital interests (save your life, or someone else's)

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify our use of your data.

Collecting this data

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

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.

How we store this data

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. Our record retention schedule sets out how long we keep information about alumni, friends and supporters. For more information, please ask the Data Protection Officer for a copy of our retention schedule (jboorman@gordons.school).

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.

We will dispose of your personal data securely when we no longer need it.

How and why does the School share your information with third parties?

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

- We have a website that collects credit card and direct debit gifts
- If you attend an event we may share your information with event booking platforms
- On occasion we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders.
- 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.
- We may use contractors to help us with our work (eg a company will be used to process personal data so that we can post hard copy communications) or where we store our database in a cloud.
- Our IT system provider
- The Foundation's IT contractor

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the Data Protection Officer, Josephine Boorman, at <u>iboorman@gordons.school</u>.

You also have the right to:

- to ask us for access to information about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <u>https://ico.org.uk/concerns/</u>

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

Contact

If you would like to discuss anything in this privacy notice, please contact: Josephine Boorman, Data Protection Officer, at <u>iboorman@gordons.school</u>

Josephine Boorman Data Protection Officer

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