

## PRIVACY NOTICE FOR ALUMNI (CLIFTON ROSARIANS)

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| Notice applies to Alumni |                    |
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| Author:                  | Mr Michael Stewart |

| Version  | Date       | Paragraph | Material change                         | Approval           |
|----------|------------|-----------|---|--------------------|
| 05.23 v1 | 17.05.2023 | All       | Notice updated and sections re-drafted. | Mr Michael Stewart |

*Clifton High School is committed to child protection and safeguarding children and young people and expects all staff, visitors and volunteers to share this commitment.*

### 1. Who this Privacy Notice applies to

This Privacy Notice is intended to provide information about how the School will use (or ‘process’) the personal data of former pupils, parents and grandparents of former pupils, grandparents of current pupils, former staff, former governors and alumni of Clifton High School (referred to in this policy as ‘Alumni’ or ‘you’).

References to the School (or ‘we’) in this policy are references to Clifton High School and where applicable also include the Clifton High School Foundation.

### 2. Child Protection and Safeguarding

Child protection and safeguarding requirements always supersede data protection legislation. If information needs to be shared in the interests of child protection and safeguarding, this Privacy Notice can never be used as a reason not to do so.

Alumni are reminded that the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education (**KCSIE**)) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. Copies of the School’s Child Protection and Safeguarding policies can be found on the School website.

### 3. About this Privacy Notice

The School collects, uses, holds and shares (‘processes’) personal data relating to you as a past pupil and as a member of the alumni. This makes the School a data controller of your personal



information, and this Privacy Notice is intended to help you understand how and why we collect personal information about you, and what we do with that information. It also explains what your rights are in relation to your personal data.

Alumni are encouraged to read this Privacy Notice and understand your rights and the School's obligations.

This Privacy Notice applies alongside any other information the School may provide to you about a particular use of personal data, and applies in addition to the School's other relevant terms and conditions and policies, including the Data Protection policy and the Data Retention and Disposal policy, and the CCTV policy.

#### **4. What is personal data?**

Personal data is information that the School holds about you that identifies you as an individual and includes information such as your name, date of birth and address, financial information and also photos and video recordings of you.

#### **5. Responsibility for data protection**

The School has appointed the Finance Director as the Data Protection Lead, whose role is to monitor that all personal data is processed in compliance with this Privacy Notice and the principles of the applicable data protection legislation. Any questions about the operation of this Privacy Notice or any concerns that the Privacy Notice has not been followed should be referred in the first instance to the Data Protection Lead ([finance@cliftonhigh.co.uk](mailto:finance@cliftonhigh.co.uk)/0117 973 0201/Extension 227).

#### **6. How we collect your information**

The School usually receives personal data either from you directly either from when you were a pupil or after you left, or indirectly, from your parents. However, in some cases your personal data will be supplied by third parties (for example from other Alumni) or collected from publicly available resources as part of exercises to improve the quality of the data or to contact those with whom the School has lost touch.

#### **7. The types of personal data we collect and process**

##### **7.1 Personal data**

The personal data that the School may collect and process includes:

- contact and communications information, such as your name, addresses, telephone numbers, e-mail addresses, other contact details, and the year you left the School;
- records of communications and interactions with you;
- bank details and other financial information (e.g. about Alumni who make donations or pay to attend ticketed events, and any anti-money laundering information we are required to collect by law); and



- images of Alumni engaging in School events, and images captured by the School's CCTV system (in accordance with the School's CCTV Policy).

## **7.2 Special category personal data**

The School may on occasion also need to collect and process special category personal data concerning dietary requirements for example, in accordance with rights or duties imposed on us by law, or from time to time by explicit consent where required. Examples of the reasons why we collect special category personal data are set out in section 9 below.

## **8. The legal justification for processing your personal data**

The School needs to process your personal data as part of our daily operation. We will only process your personal data when the law allows us to, in one or more of the following circumstances, which may overlap.

### **8.1 Where it is necessary for our legitimate interests**

The School will process your personal data where it is necessary for the School's (or sometimes a third party's) legitimate interests. This is the most common ground on which we process personal data. When we process data because it is necessary for the School's legitimate interests, it must not involve special or sensitive types of data (unless you give consent), and we must balance our legitimate interests with your privacy, interests, rights and freedoms.

The School expects that the following uses will fall within the "legitimate interests" category:

- maintaining relationships with Alumni, including direct marketing or fundraising activity;
- for the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
- for the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law;
- to monitor (as appropriate) use of the School's IT and communications systems;
- for security purposes, including CCTV in accordance with the School's CCTV policy;
- to carry out or cooperate with any School or external complaints, disciplinary or investigation process; and
- where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the school.

### **8.2 Other justifications for processing your personal data**

#### **8.2.1 You give us consent**

We may ask for your consent to process your personal data as an alternative to relying on legitimate interests or one of the bases below. For example, we may ask for your consent before



taking or using photographs and videos if the photograph or video is more intrusive than would usually be expected and we cannot rely on legitimate interests for that use. If we ask for your consent to use your personal data you can withdraw this consent at any time.

### **8.2.2 We need to perform a legally binding arrangement with you**

The School will process your personal data in order to fulfil our legal rights, duties and/or obligations under that arrangement.

### **8.2.3 We need to comply with a legal obligation**

The School may process your personal data to comply with its legal obligations.

### **8.2.4 We have a vital interest**

The School will process your personal data if it is necessary to protect your life. For example, information relating to any medical conditions you have.

### **8.2.5 We need to carry out a task in the public interest**

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

- safeguarding and promoting the welfare of pupils at the School;
- facilitating the efficient operation of the School; and
- ensuring that the School complies with all of its legal obligations.

## **9. Special category personal data**

### **9.1 Additional conditions required for processing**

We will process special category personal data in a lawful, fair and transparent way and will process it under one of the grounds set out in section 8 of this Privacy Notice. In addition, we will only process special category personal data where one of the following conditions applies:

- you have given us your explicit consent to do so, but only in circumstances where seeking consent is appropriate;
- you have already made the data publicly available; or
- it is necessary:
  - for the purposes of carrying out obligations under social protection law;
  - to protect your vital interests (if you are not legally able to give consent);
  - for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against us or you.
  - to comply with public health requirements; or
  - in connection with some function in the substantial public interest.

### **9.2 Reasons for processing special category personal data**

The reasons for collecting special category personal data include:



- to safeguard Alumni welfare: for example, to ensure best practice in fundraising activities is maintained, or for caterers or organisers of events who need to be made aware of dietary or medical needs; or
- to comply with our legal obligations and duties of care.

#### **10. Who has access to personal data and who the School shares it with**

Personal data collected by the School will usually remain within the School, and will be processed by appropriate members of staff in accordance with access protocols (i.e. on a 'need to know' basis). However, some functions are outsourced, including certain IT, cloud storage, records management and monitoring activities. In accordance with data protection law this type of third-party data processing is subject to contractual assurances by the third party that personal data will be kept securely and processed and used in accordance with the law.

In addition, from time to time, the School will need to share personal information relating to you with third parties, such as appropriate contractors, companies that provide data cleansing services or those with designated responsibility for undertaking tasks on behalf of the School.

#### **11. The Clifton High School Foundation (the "Foundation")**

The School may share some of your personal data (including your contact details) with the Foundation, so that the Foundation can keep you updated about School activities or events of interest, and its marketing and fundraising activities.

The Foundation may contact you by post and/or email for marketing purposes or in order to promote and raise funds for the Foundation and, where appropriate, other worthy causes. However, you have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. Should you wish to limit or object to any such use, or would like further information, please contact the Director of Development by email ([development@cliftonhigh.co.uk](mailto:development@cliftonhigh.co.uk)). If you withdraw consent or object to direct marketing or fundraising, the Foundation will retain some of your details to ensure that no more communications are sent to that particular address, email address or telephone number.

#### **12. How long your information is kept**

The School will retain personal data securely, and will retain it for as long as it is needed for the purposes set out in this Privacy Notice or for as long as the law requires us to. The specific periods of time are set out in the School's Data Retention policy.

If you have any specific queries about how our retention policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Data Protection Lead using the contact details set out above. However, please bear in mind



that the School will often have lawful and necessary reasons to retain some personal data following such request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of that fact in order to fulfil your wishes (called a "suppression record").

### 13. Rights

#### 13.1 Your rights

You have the following rights:

- **To be informed about the collection and use of your personal data**
- **To obtain access to and copies of the personal data that we hold about you ("subject access request")**

The School will be able to respond more quickly to smaller, targeted requests for personal data made during term time. If the request is excessive or similar to previous requests, the School may ask you to reconsider, or require a reasonable fee for the administrative costs of complying with the request, or in certain cases refuse the request (if permitted under data protection law).

- **To require us to correct personal data we hold if it is incorrect**

The School will endeavour to ensure that all personal data held is as up to date and accurate as possible, but you have the right to request that any out-of-date, irrelevant or inaccurate information about you is erased or corrected, and you should let the School know if you believe that data is inaccurate or not up to date. The School will not (subject to data protection law) necessarily delete or amend views, opinions, notes or records purely on the request of an individual who disputes the account, although we may keep a record of all parties' viewpoints.

- **To require us (in certain circumstances) to erase your personal data**

A request for a "right to be forgotten" may be refused if processing is necessary for one of a number of specific reasons, for example, to comply with a legal obligation or where it falls within a proportionate legitimate interest identified in this Privacy Notice. Generally, if the School still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. All such requests will be considered on their own merits.

- **To restrict our data processing activities**
- **To obtain and reuse the personal data that we hold for you**
- **To object to any of our particular processing activities** where you feel this has a disproportionate impact on your rights.



You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at [www.ico.org.uk](http://www.ico.org.uk).

### **13.2 Limits to your rights**

The rights set out in section 13.1 are not absolute, and the availability of the rights will depend on the lawful grounds on which we are processing your personal data (as set out in section 8).

In addition, the rights listed in 13.1 are limited to your own personal data, and certain data is exempt. This will include information which identifies other individuals, or information which is subject to legal privilege (for example legal advice given to or sought by the School, or documents prepared in connection with a legal action, or where a duty of confidence is owed by a legal adviser).

### **13.3 Responding to the exercise of your rights**

The School will aim to respond to any requests as soon as is reasonably possible and in any event within statutory time-limits, which is generally one month, but fulfilling more complex or multiple requests, for example those involving third party information, may take two to three months longer.

## **14. Security**

The School will take appropriate technical and organisational steps to ensure the security of personal data, including policies around the use of technology and devices, and access to school systems.

All staff are made aware of this policy and their duties under data protection legislation and receive relevant training.

## **15. Queries and complaints**

Any comments or queries about this Privacy Notice should be directed to the Finance Director using the following contact details: [finance@cliftonhigh.co.uk](mailto:finance@cliftonhigh.co.uk) / 0117 973 0201 / Extension 227.

If you believe that the School has not complied with this Privacy Notice, or acted otherwise than in accordance with data protection law, you should speak to your tutor, or notify the Data Protection Lead. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.