



# BROMSGROVE SCHOOL

## PRIVACY NOTICE FOR ALUMNI

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# **PRIVACY NOTICE FOR ALUMNI**

## **INTRODUCTION**

This notice is to help you understand **how** and **why** we collect personal information about you and **what** we do with that information. It also explains the decisions that you can make about your own information.

Throughout this Notice, "School" "we", "our" and "us" refers to Bromsgrove School.

If you have any questions about this Notice please contact the Bursar, whose contact details are set out at the end of this notice.

## **WHAT IS "PERSONAL INFORMATION"?**

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

This includes your contact information and school details.

## **OUR COMMITMENT TO THE ALUMNI COMMUNITY (“BROMSGROVIANS” AND “WINTERFOLDIANS”)**

A member of the School alumni community is someone who:

- was a pupil for more than a year at the School or
- is a current member of staff who has given five years or more service to the School or
- is a former member of staff of the School or
- is a former Governor or Foundation Trustee of the School.

We also process the personal data of parents of those who were pupils for more than a year at the School.

## **WHERE DOES THE SCHOOL GET YOUR PERSONAL DATA FROM?**

We obtain personal data regarding you from the following sources:

### **The School**

- via automatic transfer from the School database (iSAMS) to the alumni database upon leaving (usually in the Upper Sixth for both pupils and parents).
- The School's Maroon Book.
- from the personnel department if you are a current or former member of staff, Governor or Foundation Trustee of the School
- in addition, we have historical personal information from numerous paper-based sources in the Archive (some of which are now included on the digital heritage website) including registers, House lists, minutes, named photographs, mark books, pupil record cards and other school-related material.

### **Data you provided when you:**

- registered for InTouch Bromsgrovians Connected online
- completed and returned responses such as update forms, event replies, Gift Aid/Donation forms (by mail, email)
- discussed it with School representatives, such as at an Alumni event, reunion or during a School visit

- contacted us by telephone
- registered to attend an alumni-related event
- posted or responded to a social media post

## **WHAT PERSONAL DATA IS BEING PROCESSED?**

We will collect and process personal data about you.

The data we may process includes:

- your title, first name, surname (including preferred name, former name or alias), gender, marital status, date of birth, nationality, honours
- your education record (i.e. start and end years, House, interests, prizes) but we do not retain results information. Results may be held elsewhere in the School (e.g. the careers department and records in the archive department)
- your interests whilst at School (i.e. clubs, activities, sport)
- your contact information (address, telephone, email, social media, website)
- your higher education information including university, degree subject, graduating year and result
- your occupation details including position, organisation, professional memberships and any former occupation/s
- your career highlights and other lifetime achievements
- your outside interests and membership of groups, societies, clubs
- information from articles in the media about you
- your family associations, including siblings, spouse or partner, and relationships with other alumni
- events you have been invited to and whether or not you have responded or attended
- your donations of time, expertise or money
- details you have provided regarding leaving a legacy to the School
- a record of interactions with you (i.e. conversations, phone calls, letters, emails, social media posts) in a communications log for future reference and to help tailor further communications with you. As part of this, some emails sent by the School may record whether the email has been opened and whether any links have been clicked on
- generally information that you have decided to share with us.

## **WHAT ARE THE PURPOSES FOR PROCESSING PERSONAL DATA?**

We will use your data to help us maintain and engage with our alumni community. We may also process your personal data for the following purposes:

### **Administration**

- to keep in touch with you and share your news in the School News Review, Alumni magazine, Governors' report, School website, Foundation report and on social media
- to verify an account and provide a personalised experience for you when you register with the InTouch Bromsgrovians Connected website
- to process a gift you have given (and any Gift Aid claims)
- event registration and attendance
- to process and organise any volunteering activity you have agreed to undertake
- to process information you provide for use on our websites or in our literature, for example the Donor Roll of Honour and the Donor Tree
- to keep a record of communications between you and us.

## **Foundation Donations**

Our Foundation has been running since 2007. Whilst we do not actively fundraise, we are most grateful to those Alumni who wish to donate funds for life-changing bursaries to enable pupils who would not otherwise be able to attend the School.

We do not currently intend to use our alumni database to ask for money for capital projects or bursary funding. In addition, it is our policy to not advertise other charities or initiatives, including Bromsgrovians who are raising money for projects of a charitable nature. We shall never send your personal information out to wealth data companies and we shall not use your information for telephone campaigns or appeals unless we have sought your specific permission in advance. Direct asks will never be made at our events unless we tell you about the objective in advance.

## **Volunteering**

We are most grateful to our alumni for donating their time and expertise to help current and former pupils.

Volunteering supports:

- mentoring
- internships/work experience
- careers advice for students and recent leavers
- presentations to current students and parents
- interview practice

## **Sharing memories**

We sometimes share School leaving years or House lists which detail the first name, surname, House and years at School for other individuals who left Bromsgrove in the same year, or who were in the same House. These lists are used to remind alumni about reunions and other events, enabling them to reminisce and invite others who might not have responded to invitations.

The information can also help the School to make contact with alumni we have lost touch with. Individuals with whom the lists are shared are asked if they are in touch with anyone on the list and, if appropriate, asked to approach these individuals to establish if they would like to receive communications from the School. We will never pass on contact details without asking individuals first.

We may also share recordings, old photographs and news stories from our Archive in social media posts and for displays at our Alumni/School events.

We record, on film and/or via audio, oral histories from current pupils, current staff, former pupils (Bromsgrovians), former staff and others associated with the School for the purposes of preservation of information and to help future generations of the School recognise the importance of our history. All interviewees complete a consent form before their interview is conducted, which is then kept on file by the Archivist. The oral histories are stored securely on the School's digital image server.

We will take photographs or videos of you to use in our publicity or on our social media platforms and website. If we consider that the photograph or video is more privacy intrusive then we may ask for consent first.

## **Reunions**

In addition to hosting our own official Bromsgrovian reunions in School and other locations around the world, on occasion members of the alumni community host their own reunions and gatherings. So that the organiser can establish who to invite, the School may provide some information.

The School may provide organisers with details of alumni from a selected year group and/or House, as requested by the organiser. Details provided include first name and surname (as it appears on the alumni database), years at School and House. No contact details are given out, as the School will always facilitate the initial contact between alumni.

### **Archives**

To mitigate the impact on the data subject (pupil or staff member), personal records will be closed to public access for 100 years. If you wish to access your own record, a system of screening will be in place so that you only view your personal data.

Protocols are in place to prevent unauthorised access to closed records, for example, we hold a password-protected database and access to the archive store is restricted to key holders.

In relation to archive enquiries, contact details will only be kept as long as the archivist can prove legitimate interest, for example, the need to go back to an enquirer should additional information be uncovered at a later date.

Honours boards listing the names of current/former pupils are displayed in Houses and in buildings such as the cricket pavilion, hospitality suite and the Old Chapel. There is also a donor tree, which lists some of the names of those who have given gifts to the School and Foundation. The legacy board details historical information since the School was founded for those who have left a legacy. We will always respect a person's right to anonymity and will not include any names of those who have expressed this to us.

The Bromsgrovian magazines (dating back to 1890) and other Archive-related documents are now digitised, producing an online, searchable record to deal with Archive enquiries and research.

### **UPDATING YOUR DATA**

We will update the data we hold on you from time to time. For example, if you provide us with new contact details or change your details on websites managed by the School or social media sites such as Facebook, Twitter, Instagram and LinkedIn. We will always respond to your request for your data to be updated. You can email us at [oldbromsgrovians@bromsgrove-school.co.uk](mailto:oldbromsgrovians@bromsgrove-school.co.uk)

You can also update your own data online by logging on to [www.bromsgrovians.com](http://www.bromsgrovians.com)

### **WHO CAN SEE YOUR DATA?**

Your data is held securely within the School. Access is strictly controlled and staff receive training on data protection.

We may employ IT experts from outside of the School to aid with the development of our systems. They may have access to information that is necessary to complete the specific task they are appointed to facilitate. These experts will provide their services in accordance with the strict instructions of the School. In particular they must respect confidentiality and to the extent they do need to temporarily hold any data, that data must be held securely, strictly used only for the agreed purpose, kept for only as long as necessary and then destroyed.

If you have registered for InTouch Bromsgrovians Connected, you can select what personal information will appear in your profile. All contact information will remain hidden, unless you wish to change the settings yourself. The data visible by default (again, unless you change your own settings) is that which is already readily available in the public domain: title, first name, surname, years at School and House. Other members will see this through the 'find friends' directory. If you wish, you can also hide this default data from members by changing your settings when you log in to InTouch Bromsgrovians Connected.

We facilitate communications between individual alumni, but in doing so we do not release personal contact details without gaining permission first.

We will not sell or share your data with third parties for their commercial purposes. We never use our alumni database to ask for money for bursaries or capital projects. It is our policy to not advertise other charities or initiatives, including Bromsgrovians who are raising money for projects of a charitable nature. We shall never send your personal information out to wealth data companies and we shall not use your information telephone campaigns or appeals unless we have sought your specific permission in advance. Direct asks will never be made at our events unless we tell you about the objective in advance.

## **COMMUNICATIONS**

We will communicate with you by email, post, SMS, social media and telephone to pursue the purposes mentioned above. In particular, we regularly communicate with people for the following purposes:

- share news about the School and our alumni
- invite you to events and reunions
- invite you to volunteer for the School, particularly in relation to events and the careers department
- ask if you are willing to offer advice and guidance to current or former pupils and give support to them during their time at School and in their career.

We will only contact you for the above purposes where we are allowed to do so under data protection law (for example, we will usually need your consent before sending you an email about a fundraising opportunity). If you tell us that you do not want to be contacted for any of these purposes then we will of course respect that.

We will keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes, for example, if we consider the information might be useful if someone wanted to write a book about the School.

We will also keep information for a long time as part of our wider legal and regulatory obligations, even if that information is no longer needed for marketing, development or fundraising purposes. This is especially relevant to former staff, pupils and parents. For more information on how personal information is used by the School more widely please contact the Bursar.

Our Information and Records Retention Policy sets out how long we keep different types of information.

If you prefer not to have your personal data used for any or all of the above purposes, please email [oldbromsgrovians@bromsgrove-school.co.uk](mailto:oldbromsgrovians@bromsgrove-school.co.uk)

To manage your own communication preferences, please log on to [www.bromsgrovians.com](http://www.bromsgrovians.com).

If you are unsuccessful in unsubscribing from our communications and/or remain concerned, please contact the Bursar.

## **OUR LEGAL BASES FOR USING YOUR INFORMATION**

This section contains information about the legal bases that we are relying on when handling your information.

### **Legitimate interests**

This means that we are using your information when this is necessary for our legitimate interests, except when your interests and fundamental rights override our legitimate interests. We rely on legitimate interests to use your information for all of the purposes described above unless any of the alternative bases in the table below apply. Specifically, we have a legitimate interest in:

- ensuring that there is an active community of supporters which will benefit the School and members of the School community, such as current and former pupils and parents;
- promoting the objects and interests of the School;
- using your personal information to administer our events;
- safeguarding and promoting the welfare of our pupils with whom you may be in contact e.g. if you arrange work experience or mentor a pupil; and
- ensuring that we comply with our legal obligations.

If you object to us using your information where we are relying on our legitimate interests as explained above please let us know. You can use the contact details set out at the end of this notice.

### **Consent**

In some cases, we are processing your personal information because you have given us your consent to do so.

If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. To withdraw your consent please let us know. You can use the contact details set out at the end of this notice.

### **Necessary for a contract**

We will need to use your information in order to perform our obligations under a contract with you, for example, we need your name and contact details so that we can send you tickets for a concert that you want to attend.

### **Legal obligation**

On some occasions we will need your information to comply with a legal obligation. For example, we may need to keep a record of who is attending an event so that we can comply with our health and safety obligations.

### **Vital interests**

For example, to prevent someone from being seriously harmed or killed.

We must also comply with an additional condition where we process 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.

Our bases for processing special personal information will depend on the circumstances:

**Vital interests**

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

**Legal claims**

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

These two conditions may also apply if we ever need to process information about criminal convictions and offences.

**Substantial public interest**

The School is also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This will apply if we need to use special category data in connection with your attendance at one of our events, for example, if we need to make adjustments because of a disability you have.

It is recognised that some of the above grounds will overlap and that the School could rely on multiple grounds justifying its lawful processing.

**SENDING INFORMATION TO OTHER COUNTRIES**

In certain circumstances, we may need to 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, we may:

- store your information on cloud computer storage based overseas; and
- if you are an overseas Bromsgrovian, we may share information with an event organiser

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

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.

We will 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 Bursar.



## FOR HOW LONG DO WE KEEP YOUR INFORMATION?

As a member of the School and part of the alumni community, we value the lifelong relationship that this nurtures. Generally speaking, the School will look to retain alumni personal data until the individual asks us to remove it from our records.

If you decide that you no longer wish to receive communications from the School, please be aware that we still need to retain a minimal amount of personal data so that we can keep a record that you have asked us not to contact you.

## WHAT DECISIONS CAN YOU MAKE ABOUT YOUR INFORMATION?

From 25 May 2018, data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- **Rectification:** if information the School 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 (SAR). 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 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:
  - we are using it for direct marketing purposes (e.g. to send you the School and Alumni magazines);
  - the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest.
  - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of you at a School event for historical reasons.

The Bursar can give you more information about your data protection rights.

## FURTHER INFORMATION AND GUIDANCE

The Bursar is the person responsible at our School for managing how we look after personal information and deciding how it is shared.

Like other organisations, we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly treat the information we get fairly.

This notice is to explain how we use your personal information. The Bursar can answer any questions which you may have.

This privacy notice does not, and is not intended to, give you any rights which you did not already have.

Please speak to the Bursar if:

- you object to us using your information for any of the outlined purposes within this Alumni Privacy Notice. We will stop using your information if you tell us not to
- you would like us to update the information we hold about you
- you would prefer that certain information is kept confidential.

## **CONTACT DETAILS**

If you have any concerns with regard to the way your personal data is being processed or have a query with regard to this Notice, please contact our Bursar, Lesley Brookes: [lbrookes@bromsgrove-school.co.uk](mailto:lbrookes@bromsgrove-school.co.uk)

Our postal address is Bromsgrove School, Worcester Road, Bromsgrove, Worcestershire, B61 7DU, United Kingdom

Our telephone number is +44 (0)1527 579679

## **CHANGES TO THIS NOTICE**

You can obtain the current version of this Notice from <http://www.bromsgrove-school.co.uk/old-bromsgrovians.aspx>, on the Bromsgrovians Connected website at [www.bromsgrovians.com](http://www.bromsgrovians.com) and on the Digital Heritage website, [www.bromsgrove-schoolarchive.co.uk/](http://www.bromsgrove-schoolarchive.co.uk/).