

Privacy Notice – Alumni

Prince Regent Street Trust

Hartburn Primary School



Status	Date
Date Issued:	Summer Term 2022
Prepared by:	PRST Central Team
Adopted by:	To be ratified by Governing Body
Next Review date:	Summer Term 2025
School Name:	Hartburn Primary School

1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school & 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 alumni of the school.

Our trust, Prince Regent Street Trust & Hartburn Primary School, Adelaide Grove, Stockton on Tees, are the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Education Data Hub (GDPR for Schools), Derbyshire County Council (see 'Contact us' below).

2. 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
- Photographs of your time at the school
- Information required to manage your attendance at alumni events, including access arrangements and dietary requirements

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

3. Why we use this data

We use the data listed above to:

- a) Help us build a community around the school
- b) Offer enrichment and career development opportunities to current pupils
- c) Notify you of alumni events you may be interested in
- d) Keep you up to date with school news
- e) Help us promote the school
- f) Keep you safe and comfortable while attending alumni events
- g) Tailor the communications we send to you, to ensure they are appropriate and relevant

3.1 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).

3.2 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 in order to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this data

The lawful bases for processing are set out in Article 6 of the UK GDPR:

Article 6a Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

Article 6d Vital interests: the processing is necessary to protect someone's life.

Article 6e Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

Article 6f Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Where you have provided us with consent to use your data, you may withdraw this consent at any time.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life),
 in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

5. Collecting this data



While the majority of information we collect about you is requested on a voluntary basis. In order to comply with GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- School records

6. How we store this data

We keep personal information about you while you remain involved in our alumni network. 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.

7. Who we share data with

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

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

- Our local authority [Stockton] to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Our regulator, [e.g. Ofsted] to meet our legal obligations to share certain information with it, such as safeguarding concerns

7.1 Transferring data internationally

We will not share your personal information with any international third party.

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this



Give you a copy of the information in an intelligible form

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 (see 'Contact us' below).

8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations To exercise any of these rights, please contact us (see 'Contact us' below).

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.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/make-a-complaint/
- 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 concern about the way we are collecting or using your personal data, would like to exercise your rights, or you would like to discuss anything in this privacy notice, we ask that you raise your concern with us in the first instance.

Please contact the School Office, Headteacher at Hartburn Primary School, CEO of Prince Regent Street Trust or the Trust's DPO:

Data Protection Officer Name: Education Data Hub (GDPR for Schools), Derbyshire

County Council

DPO Email: gdprforschools@derbyshire.gov.uk

DPO Phone: 01629 532888

DPO Address: County Hall, Smedley Street, Matlock, Derbyshire, DE4 3AG

