



**ST EDWARD'S
OXFORD**

Woodstock Road
Oxford
OX2 7NN

PRIVACY NOTICE

FOR

ALUMNI (OSE)

Last updated 24/05/2018

Introduction

St. Edward's School (referred to as 'the School', 'we') is committed to protecting your personal information when you use its services.

This privacy notice is to help you understand how and why the School collects your personal information. It also explains your rights and decisions about your own information.

Who processes your information?

St Edward's School is registered as the Data Controller with the Information Commissioner's Office (ICO) to ensure that all personal data is stored and processed accurately, securely and purposefully in a timely manner.

What is personal data?

Personal data refers to information that relates to an identifiable, living individual i.e a data subject.

The **General Data Protection Regulation (GDPR)** applies to paper, electronic and other forms of personal data.

What personal data will be processed?

If you studied at the School, we process biographical, contact, and education details collected during your time as a pupil with the consent of your parent or legal guardian.

Examples of categories of personal data which we may hold are:

- Biographical/ contact details – for example, your name, postal/ email address and telephone number, date of birth, gender, marital status, and roll number;
- Education details – for example, your School dates and house, any further education courses you completed and dates of study or professional qualifications;
- Professional details – for example, employer, occupation and work address;
- Preference details – for example those provided by you for a specific purpose such as access requirements or other adjustments and dietary preferences for event management purposes and your communication preferences;
- Philanthropic details – for example, your donation history, gift amount and Gift Aid status, where applicable, as required by HMRC;
- Engagement details – for example, your membership of clubs, societies and alumni groups and networks, your attendance at School, OSE or Martyrs events and your relationships with other alumni; records of verbal or email conversations/meetings, including personal and philanthropic interests;
- Photographs – including those we have taken (for example, at events or to accompany a published interview), archive images and those which are in the public domain.

Why does the School collect and use personal information?

The School only processes data for specified purposes and if it is justified in accordance with data protection law. In general terms, we process your personal data to improve your experience and engagement with the School as a member of our alumni community and/or supporter.

The School collects, holds and processes personal data in order to:

- carry out its duties and manage its day to day operations as a provider of education and an employer;
- support pupil learning;
- monitor and report on pupil progress;
- provide appropriate pastoral care;
- safeguard pupils;
- provide a safe and secure environment; and
- fulfil the School's contractual and other legal obligations.

We also process personal data for the following purposes:

- To provide a service to the alumni (OSE) community and generate philanthropic support (for example, fundraising and/or volunteering) for School charitable projects. More specifically, these activities may include:
 - sending you publications (for example, the alumni magazine, *Rhubarb*; the e-newsletter *OSE News*; updates on events; and email newsletters about the School and its projects) in a way which is tailored and relevant to you;
 - helping you keep in touch with other alumni and/or members of the wider School community by inviting you to alumni reunions and School events;
 - informing you of the benefits available to alumni, such as careers advice and networking opportunities;
 - asking you if you would like to support the School (for example, by making a donation, contributing to surveys, volunteering, or speaking at an event);
 - thanking you for any gifts of time and money that help the School's charitable causes;
 - undertaking any necessary research for our due diligence to meet money laundering regulations in alignment to our Gift Acceptance policy; and,
 - internal record-keeping and administration (for example, to administer an event which you are attending or process a donation).
- To publish photographs and videos relating to our activities and events. We will inform you about such processing at the time when the data is obtained or as soon as reasonably possible thereafter.

What are the legal bases for processing personal information?

Data Protection law sets out the legal reasons why the School may process personal data:

- Legitimate Interests – where the processing is to pursue the School's legitimate

interests in a way that might be reasonably expected and does not materially impact the rights, freedoms or interests of the individual.

- Contract – where the processing is required to fulfil a contract we have with the individual, such as the parent of a child or member of staff.
- Legal Obligation – Where the legal obligations placed on the School require us to process the data.
- Vital Interests – where the processing is necessary to protect the vital interests of the individual, such as to protect any individual from serious harm.
- Public Interest – where the processing is necessary for a purpose permitted by Data Protection law in the substantial public interest – for example, where necessary for safeguarding purposes or to protect the public.
- Consent – where the individual has given specific consent for the processing of data. Consent is required only when the School is not relying on one of the other bases.

How does the School get this information?

The School gets this information by asking for details to be provided through forms and via other communication means including emails. Some of the personal data we hold about you has been provided by you during interactions with the School, for example website activity, face to face meetings, event registrations, volunteering activity or making a donation. The School may get information from you directly, or indirectly from members of staff, other OSE etc. We may also collect and hold personal information derived from publically available sources which may include LinkedIn, Twitter, Companies House and other business-related resources including company websites, The Queen's Honours lists, Royal Mail National Change of Address service, reliable news and press reports.

What are your rights?

You have the right to:

- object to the processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means ;
- have inaccurate personal data rectified, and in certain circumstances, blocked, erased or destroyed; and
- access information that the School holds about you.

Will information be shared?

Any information which falls under personal data, and is not otherwise exempt, will remain confidential and will be disclosed to third parties only with the consent of the appropriate individual or under the terms of this notice.

In order to send out School publications, contact details of the individuals may need to be shared with trusted suppliers for printed and electronic material with prior consent.

There may be circumstances where the School is required either by law or in the best interests of its data subjects to pass information onto trusted external authorities.

How long does the School keep your data for?

The School has a duty to retain personal data and records for a period of time mainly for legal and other legitimate reasons. Data may be retained following the pupil's departure from the School.

The School's Data Retention Policy defines the length of time for which personal data and records are kept.

Audit and Review:

To ensure compliance with the latest data protection legislation, the School will undertake periodic audits of systems and business processes to identify areas of non-compliance or improvement.

This notice will be reviewed periodically and up dated in accordance with changes in legislation.

Queries & Complaints

If you believe that the School has not complied with this notice or acted otherwise than in accordance with the data protection regulation, or believe a data breach has occurred, you should contact the School's Data Protection & Compliance Manager, in writing.

The School will take all steps possible to ensure that it is rectified or corrected. All notifiable breaches will be reported to the relevant supervisory authority within the necessary time frame and guidelines.

If an individual believes that the School has not complied with their data protection rights, they have the right to make a complaint to the Information Commissioner's Office (ICO) <https://ico.org.uk/> although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.

Further information and guidance

If you would like any further information about anything within this notice, please contact the School's Data Protection & Compliance Manager.

While this notice is to explain how the School looks after personal data, a detailed Data Protection Policy is available on the School Website.