



PRIVACY NOTICE for ALUMNAE

1. Introduction

This notice is to help prospective and current Alumnae understand **how** and **why** the School collects personal information relevant to them. It also explains **what** the School does with that information and explains the decisions which Alumnae can make about their own information.

2. What is 'personal information'?

Personal information is information which the School collects about individuals. This includes information such as name, date of birth and address/contact details as well as exam results, medical details, nationality.

3. Why does the School collect and process personal information?

The School, through the Alumnae, collects this information to help it operate legally, safely and effectively in the wide range of situations and processes which represent its day-to-day operations which includes supporting the charitable aims of the Alumnae organisation. Here are some examples:

- The School needs to collect and generate a range of personal data on Alumnae members in order to keep them informed, through newsletters and invitations, about the school and to provide opportunities for involvement in the life and activities of the school. These include:
 - (i) Providing information on services and events, specifically those that members have requested;
 - (ii) Providing the opportunity for members to volunteer;
 - (iii) Providing the opportunity for members to engage in fundraising activity
- The School uses photographs or videos of School events including Alumnae events on its website, social media sites, prospectus and for other marketing purposes;
- The School may carry out wealth screening to further its charitable aims of fundraising;
- The School may analyse data collected to make communications more relevant;
- The School may need to share information with the police or legal advisers to help with an enquiry;
- The School uses CCTV to ensure the site is safe.

4. How does the School collect personal information?

Personal information on Alumnae is captured in a number of ways. Primarily, such information is collected on data forms during the registration and admissions processes for prospective students, from parents/carers and Alumnae themselves and then again before you leave school. CCTV, photos and video recordings of individuals visiting the site are also gathered in the normal course of the business of the school. Occasionally we might obtain information from the public domain, for example via social media platforms such as LinkedIn or through third parties.

The categories of information which the Alumnae Office collects, holds and shares include:

- Personal information (such as name, date of birth, contact details);
- School specific information (such as class of, co-curricular activities);
- CV information (such as universities attended, careers);
- Consent options (such as email, post, text);
- Financial contribution (such as donations);
- Activity (such as events attended, contact made with the school, careers assistance);
- Interests and activities;
- CCTV images and photographs.

The School considers all of this information to be important in order to enable it to support and provide a service to our Alumnae and their families.

5. What does the School do with personal information?

Personal information is kept with appropriate security, either electronically on the School's information management systems or manually in indexed filing systems. The Director of Marketing and Admissions is responsible for the control of Alumnae personal information within the School and deciding how it is shared. The information is kept up to date, as far as possible, by reference to the data subject, is treated fairly and is only used for purposes as defined by the School. Exceptional circumstances may occur when it is deemed necessary by the School to share personal information more widely. An example of this is requests for information from other institutions that a student may attend after leaving us. However, the School does not share any personal data about our Alumnae with anyone without their consent unless the law and our policies allow us to do so. In some cases, the School uses third parties to handle personal information on our behalf, e.g. IT providers who might store personal information on the cloud or access such information when checking the security of our network.

6. Our legal grounds for using information

This section contains information about the legal basis that the School is relying on when handling personal information.

a. Legitimate interests

This means that the data processing is necessary for legitimate interests except where the processing is unfair to you. The School relies on legitimate interests for most of the ways in which it uses information.

Specifically, the School has a legitimate interest in:

- Providing educational services to students;
- Safeguarding and promoting the welfare of Alumnae and students;
- Promoting the objects and interests of the School and Alumnae;
- Facilitating the efficient operation of the School and Alumnae; and
- Ensuring that all relevant legal obligations of the School are complied with.

If you object to us using your information where the School is relying on our legitimate interests as explained above, please contact the Director of Communication and Admissions.

b. Legal obligation

The School will need to use your information in order to comply with a legal obligation, for example to report a concern to Children's Services. The School may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

c. Vital interests

The school may have to act in vital interests, for example, to prevent someone from being seriously harmed or killed.

d. Public interest

The School considers that it is acting in the public interest when providing education and supporting Alumnae and related activity.

e. Consent

The individual has given clear consent to process their personal data for a specific purpose, such as wealth screening and profiling.

7. Sending information to other countries

The School will not transfer any personal data outside the EEA unless it is satisfied that the data subject's rights will be adequately protected.

8. Retention policy

The School retains information where it has a legitimate interest in holding that information in the fulfilment of its role and objectives as an educational institution. In some cases, information can be held for longer. For example, the School may retain student names indefinitely for research and statistical purposes.

9. What decisions can you make about your information?

If personal information is felt to be incorrect, the School should be contacted and asked to rectify, block, erase or destroy the data as necessary. This is subject to the School's assessment on whether the request is a valid one.

The Business Director is responsible for data protection compliance and can be contacted directly, regarding what personal information is held by the School. The Business Director can also be requested to keep specific information confidential.

A request to see personal information held on an individual represents a 'subject access request'. Any such request must be made in writing to the Business Director.

The Business Director can be contacted via email at sbd@swps.org.uk, by telephone on 01932 574 900 or in writing to the School's address.

10. Further information

If you have any concerns about how the School uses personal information, you can contact the Business Director on sbd@swps.org.uk or the Information Commissioner at:

Information Commissioner's Officer
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: 01625 545 745 Fax: 01625 524 510
www.ico.org.uk