



Privacy Notice for ISH Alumni Network

Version v2022-01

At the International School of Hamburg (hereafter: ISH) we respect your privacy and want to protect your personal data. With this notice we are informing you about how your data may be processed in the context of the ISH Alumni Network. We inform you about the purpose of doing so, who we are sharing your data with, and your rights.

The legal framework for processing of personal data at ISH, as an interdependent, supplementary school in the Hamburg school system, is given by the European Union's General Data Protection Regulation (GDPR), the German Federal Data Protection Act (new BDSG) and the Hamburg Law on Independent Schools (HmbSfTG). We take our responsibility to comply with these applicable data protection regulations very seriously.

This Privacy Notice primarily applies to:

- Alumni (former students and graduates) of ISH
- Parents of Alumni, as legal representatives of Alumni under 16 years of age
- Former Teachers and Staff of ISH

1. Data Protection Terms

For the purposes of this policy, the following data protection terms apply:

Personal Data means any information relating to a living individual who can be identified from that information or from any other information we may hold. Personal Data can include names, identification numbers, addresses (including IP addresses), dates of birth, financial or salary details, education background, job titles and images. It can also include an opinion about an individual, their actions or their behaviour. Personal Data may be held on paper, in a computer or any other media whether it is owned by the organisation or a personal device.

Data Controller means the organisation which determines the purposes for processing Personal Data and the manner in which that processing will be carried out. In most cases, the ISH will be the Data Controller of the Personal Data it collects and uses as part of its school activities.

Data Processor means the organisation or person that processes Personal Data on our behalf and in accordance with our instructions, such as suppliers and contractors. Our staff members are not Data Processors.

Data Subjects are all living individuals about whom we hold Personal Data.



Special Categories of Personal Data are more sensitive, and include information revealing an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership. It will also include data concerning health (physical and/or mental health), data concerning a person's sex life or sexual orientation, and genetic and biometric information where that data is used to uniquely identify a person. We will also treat data relating to criminal convictions or related proceedings in the same way as special categories of data.

Processing means any activity which is performed on Personal Data or Special Category Data. It includes the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction of data.

2. What are the categories of the personal data being processed?

Within the context of the ISH Alumni Network ISH may process contact data, such as full name, address, email, phone numbers, location information or social media profiles of Alumni.

Moreover, personal data on years of attendance at ISH, graduation year, professional career development and further education, such as college or university attendance, areas and level of study, apprenticeship and nature of and location of employment may be processed.

We may also collect and process data relating to your experiences at ISH.

In the course of fundraising activities ISH may collect and process financial transaction data.

In the use of our Alumni Portal, usage data such as an IP address and portal login data is processed.

At no time will ISH process data of a special category nature according to Art. 9 GDPR in the context of the ISH Alumni Network.

3. Why and how are we processing your data?

Upon graduating or leaving ISH, students are automatically denoted as alumni in our school information system. Graduate and former students over 16 years of age can become part of the ISH Alumni Network and are provided a login to our Alumni Portal. Staff members leaving the school are also eligible for a login to our Alumni Portal.



Alumni can also sign up to the ISH Alumni Network through our school website, after which they will be directed to our Alumni Portal.

ISH processes personal data of Alumni on the basis of Legitimate Interest (Art. 6(1)(f) GDPR) to facilitate an alum's initial membership to our ever-growing ISH Alumni Network.

ISH processes personal data of Alumni on the basis of Legitimate Interest (Art. 6(1)(f) GDPR) for the purpose of analysing and understanding the progression of our alumni from graduation into further education, and to follow their career beyond university. Understanding this data allows us to improve our educational services to our students.

ISH processes personal data on the basis of Informed Consent (Art. 6(1)(a) GDPR) for the purpose of **Alumni Relations**. Specifically, these purposes are:

- To send news, information and updates about ISH as well as invitations to events via email, social media and through the Alumni portal.
- To share post-graduation plans and experience during your time at ISH with current students and alumni.
- To promote and facilitate mentoring and internship opportunities between alumni, supporters and current students, and opportunities for alumni to mentor other alumni.
- To provide more opportunities for reunions, tours of the school, and regional alumni groups.
- To appeal to the Alumni network to raise funds for specified projects.
- To understand how Alumni network members are interacting with our digital platforms.

Consent to process data for the purpose of Alumni Relations can be retracted at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.

Please send requests for withdrawal of consent to our Office of Community Relations to alumni@ishamburg.org

4. Who do we share data with and how do we keep it secure?

ISH uses our web-based, password-protected Alumni Portal, with encrypted data transfers, to store and process data of ISH Alumni Network members.

The Alumni Portal is a module of our school's school information system and is operated by Veracross LLC. in accordance with our GDPR-compliant data processor agreement.



Veracross has been awarded the TRUSTe Privacy Seal, signifying that its privacy policy and practices have been reviewed by TrustArc for compliance. Our data is hosted in secure, SSAE 16 SOC I and SOC II certified data centers in the European Union. Data subjects are informed that some processing takes place outside of the European Union. This processing is subject to safeguards approved by the European Commission. <https://www.veracross.com/privacy-policy>

Alumni portal users have the ability to update their own contact details in the portal, including their address, phone number, and email address. Alumni portal users can set their own contact data visibility settings for the Alumni Directory to control if and how other Alumni Portal users view their contact data.

For the purpose of Alumni Relations, ISH may on occasion share individual Alumni contact data, and data on employer and further education with our current staff and students.

Personal data collected via our school website for joining the ISH Alumni Network is securely transferred to FinalSite in accordance with our GDPR-compliant data processor agreement. FinalSite's software platform is GDPR, Privacy Shield, and ISO 27001 compliant. The data center is SSAE 16 SOC I and II certified. Data subjects are informed that some processing takes place outside of the European Union. This processing is subject to safeguards approved by the European Commission. <https://www.finalsite.com/software/integrations/gdpr>

All the listed categories of personal data may also be collected and processed using our school Google Workspace for Education account, according to our GDPR-compliant data processor agreement and in accordance with Google's compliance concept: <https://cloud.google.com/security/compliance>. Our data hosting location is the European Economic Area. Data subjects are informed that some processing takes place outside of the European Union. This processing is subject to safeguards approved by the European Commission. <https://cloud.google.com/privacy/gdpr>

5. How long do we process your data?

ISH will not process personal data for longer than the period necessary to fulfil the purposes of processing, as outlined above, and as required by statutory law.

ISH considers its relationships with alumni to be lifelong, giving you access to a vast support network. This means that data collected and processed for the purpose of Alumni Relations on the legal basis of consent will be maintained until such time as you notify us that you no longer wish us to keep in touch and/or that you would like to be



removed from the ISH Alumni Network. We will periodically remind data subjects that we maintain your contact data.

Personal data of Alumni that is processed on the basis of legitimate interest for the purpose of facilitating signing up to the alumni portal will be deleted after a period of 6 months from the date the school contacts the individual, should that individual choose not to utilise their login or otherwise express in written form a wish to join the Alumni portal or be contacted by the school.

6. Your Rights

In accordance with Art. 15 GDPR, data subjects have the right to access information about the personal data we, as the Data Controller, are processing about them.

Under Articles 16, 17, 18, 20 and 21 of the GDPR data subjects also have a right to ask for:-

- Incorrect information about them to be corrected
- Information about them to be deleted
- The processing of personal data to be restricted or ceased
- Data to be transferred to another data controller

Please note that these rights are not absolute and in some situations we will not be able to comply with your request. If you would like to exercise any of these rights or wish to know more about the way ISH processes your information, please contact our data protection officer at:

dataprotection@ishamburg.org

If you have any questions or concerns about the way in which your personal data is being processed by ISH, we would ask that you contact our data protection officer in the first instance so that we may assist you. You do, however, have the right to lodge a complaint with the regulatory authority, should you choose to do so. The regulatory authority for data protection in the State of Hamburg, Germany is:

Der Hamburgische Beauftragte für Datenschutz und Informationsfreiheit
Ludwig-Erhard-Str 22, 7. OG
20459 Hamburg, Germany
<https://datenschutz-hamburg.de/>