Privacy notice for the alumni

LIGHTHOUSE
MULTI ACADEMY TRUST

Policy Owner:	Lighthouse Multi Academy Trust
Approved/ Ratified:	Pat Hunt 10.11.26
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Document Version Control Log

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Definition: School alumni are former pupils or graduates of a particular educational establishment such as a school, college, or university.

1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school 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**.

Lighthouse Multi Academy Trust (LHMAT), Davis Road, Willenhall, WV12 5HA, telephone 01922 211349, is the data controller for the alumni personal data covered by this privacy notice.

This means that the Trust is responsible for deciding why and how this personal data is processed and for ensuring that it is handled in accordance with applicable data protection legislation.

Where an individual academy collects or manages alumni information on behalf of the Trust, the Trust and academy will ensure that appropriate arrangements are in place to protect the information and explain how it is used.

If responsibility for particular alumni records rests with an individual academy or another organisation, the relevant privacy information will identify the appropriate data controller and explain how to contact them.

Accessibility and equal treatment

We aim to make this privacy notice clear, accessible and understandable. If you need this information in an alternative format or require assistance to understand how we use your personal data, please contact us using the details in Section 10.

We will handle personal data fairly and without unlawful discrimination, and will consider relevant equality and accessibility requirements when carrying out our functions.

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
- Information about your use of our information and communications systems, equipment and facilities (e.g. school computers)

Some of the information we hold may be particularly sensitive. This may include health information, such as dietary requirements that reveal a medical condition, or other information that falls within the special categories of personal data defined by data protection law.

Photographs are personal data where an individual can be identified from them. They are not automatically special-category data. Where we process information that qualifies as special-category data, we will identify and document both an appropriate lawful basis under Article 6 of the UK GDPR and a separate condition under Article 9, together with any additional requirements that apply under the Data Protection Act 2018.

We will only collect and use such information where it is necessary for a specified purpose and we have the appropriate legal grounds to do so.

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Racial or ethnic origin

- -Religious or philosophical beliefs
- -Health data (covering physical or mental health, status, diseases, or disabilities)

The trust generally does **not** process special category alumni data except where necessary for accessibility requirements or where explicit consent has been obtained.

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

3. Why we use this data

We collect and 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) Raise extra money so that we can continue to improve the experience pupils get from the school
d) Notify you of alumni events you may be interested in
e) Keep you up to date with school news
f) Help us promote the school
g) Keep you safe and comfortable while attending alumni events
h) Tailor the communications we send to you, to make sure they are appropriate and relevant
i) Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely
j) Meet legal requirements placed upon us

We only use the personal data that is relevant and necessary for the particular purpose for which it is being processed. Not every category of personal data will be used for every purpose.

Where we intend to use alumni photographs, stories, achievements or other identifiable information in publications, on our website or on social media, we will ensure that the use is lawful, fair and transparent and that any necessary permissions or other legal requirements are met.

Where we use information to personalise communications or measure engagement, we will consider whether the processing is necessary and proportionate, explain any relevant tracking technologies where required, and respect individuals' applicable data protection rights.

3.1 Use of your personal data for marketing and alumni communications

We may contact you about alumni news, events, fundraising activities, campaigns and other information relevant to our alumni community.

We will ensure that our use of your personal data for direct marketing complies with applicable data protection law and the Privacy and Electronic Communications Regulations 2003 (PECR).

We will only send marketing communications by email or text message where we have obtained any consent required by law. We will maintain appropriate records of consent and provide a simple method for individuals to withdraw their consent at any time.

You can opt out of direct marketing at any time. You can do this by using the unsubscribe facility in a communication, where available, or by contacting us using the details in Section 10.

We will stop using your personal data for direct marketing when you object to that processing. This will not prevent us from sending essential administrative messages where we have a separate lawful reason to do so.

Withdrawing consent to marketing will not affect the lawfulness of processing carried out before consent was withdrawn.

3.2 Use of your personal data in automated decision-making and profiling

We do not currently process any alumni 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.

3.3 Use of your personal data for filtering and monitoring purposes

While you're in our school, we may monitor your use of our information and communications systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety, and other legal obligations
- Comply with our policies (e.g. Safeguarding and child protection policy, Parent Code of Conduct Policy, Mobile Phone Policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

4. Our lawful basis for using this data

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, we must have a lawful basis for processing personal data.

The lawful basis we use depends on the purpose of the processing and the circumstances in which the information is collected and used. We identify and document the appropriate lawful basis for each relevant processing activity.

The lawful bases that may apply to our alumni activities include:

- **Consent (Article 6(1)(a)):** where an individual has freely given, specific, informed and unambiguous consent to the processing of their personal data for a particular purpose.
- **Legal obligation (Article 6(1)(c)):** where processing is necessary to comply with a legal obligation that applies to the Trust.
- **Public task (Article 6(1)(e)):** where processing is necessary to perform a task in the public interest or exercise official authority that has a clear basis in law.
- **Legitimate interests (Article 6(1)(f)):** where processing is necessary for the legitimate interests of the Trust or a third party, except where those interests are overridden by the individual's interests or fundamental rights and freedoms. Where we rely on this basis, we will identify the legitimate interests concerned and assess whether the processing is appropriate.

We will only rely on a lawful basis where it is appropriate to the specific processing activity. Please see table below:

Alumni activity	Lawful basis
Maintaining alumni contact details	Legitimate interests
Inviting alumni to events	Legitimate interests
Responding to alumni enquiries	Legitimate interests
Equality monitoring	Public task or legal obligation
Processing accessibility requirements for events	Legitimate interests plus an Article 9 condition where applicable

The lawful basis relied upon for a particular activity will depend on the purpose of the processing and the circumstances involved. Further information about specific processing activities is provided in the Alumni Privacy Notice.

4.1 Our basis for using special category data

Where we process special-category personal data, we must identify both a lawful basis under Article 6 of the UK GDPR and a separate condition under Article 9.

Where we process special category personal data relating to alumni, we will identify both a lawful basis under Article 6 UK GDPR and a condition for processing under Article 9 UK GDPR.

Depending on the purpose of the processing, the Article 9 condition relied upon may include:

- Article 9(2)(a) - Explicit consent.
- Article 9(2)(g) - Processing necessary for reasons of substantial public interest, subject to the requirements of the Data Protection Act 2018.

We will only process special category personal data where the requirements of Article 9 UK GDPR are met. Where reliance is placed on a condition requiring additional safeguards under the Data Protection Act 2018, we will identify the relevant Schedule 1 condition and maintain an appropriate policy document where required.

We will not treat all photographs, dietary preferences or other personal information as special-category data automatically. We will assess the nature of the information and how it is used to determine whether the additional protections for special-category data apply.

5. Collecting this data

We will only collect and use your personal information when the law allows us to, as detailed above in section 4 of this notice. While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

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
- Police forces, courts or tribunals
- Other schools or trusts
- Department for Education

Where we obtain your personal data from an organisation other than you, we will explain the relevant categories of information and the source from which it was obtained, where required by data protection law.

We will provide privacy information at the appropriate time and within the applicable legal time limits. We will also explain whether providing particular information is a legal requirement, a contractual requirement or voluntary, where applicable, and the consequences of not providing information where these are relevant.

We will only collect and use information that is necessary for our stated purposes and will take reasonable steps to ensure that the information is accurate and up to date.

6. How we store this data

We retain alumni personal data only for as long as it is necessary for the purpose for which it was collected, taking account of any applicable legal, regulatory, financial or record-keeping requirements.

The retention period will depend on the type of record and the reason it is held. For example, alumni contact details, and event attendance records may have different retention requirements.

Our Records Management Policy and retention schedule set out the applicable retention periods or criteria for deciding how long different categories of records should be kept. We will review the information we hold and securely delete or destroy it when it is no longer required, unless there is a lawful reason to retain it.

Our Records Management Policy is available on the Trust website: https://www.lhmat.com/Trust-Policies/.

7. Who we share data with

We only share alumni personal data where there is a lawful basis to do so and the sharing is necessary for a specified purpose.

Depending on the circumstances, we may share relevant information with organisations that provide services to the Trust, public authorities, regulators, professional advisers, financial organisations and other organisations where the sharing is lawful and appropriate.

We will ensure that any sharing is limited to the information necessary for the relevant purpose. Where an organisation processes personal data on our behalf, we will put appropriate contractual and security arrangements in place.

7.1 Transferring data internationally

We do not routinely transfer alumni personal data to recipients outside the United Kingdom.

Where an international transfer is necessary, we will ensure that it complies with applicable UK data protection law and that the required safeguards are in place. We will update this privacy notice where necessary to explain the relevant destinations and safeguards.

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, how we are 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 a number of rights in relation to your personal data. The rights that apply will depend on the circumstances and the lawful basis for processing.
You may have the right to:

- **Access:** request a copy of the personal data we hold about you and information about how it is being used.
- **Rectification:** ask us to correct inaccurate personal data or complete incomplete information.
- **Erasure:** ask us to delete your personal data where the legal conditions for erasure are met.
- **Restriction:** ask us to restrict the processing of your personal data in certain circumstances.
- **Object:** object to processing based on public task or legitimate interests in certain circumstances. You have an absolute right to object to the processing of your personal data for direct marketing.
- **Data portability:** receive certain personal data you have provided to us in a structured, commonly used and machine-readable format, or ask for it to be transferred to another organisation, where the legal conditions are met.
- **Withdraw consent:** where we rely on your consent, withdraw it at any time. This will not affect the lawfulness of processing carried out before withdrawal.
- **Complain:** raise a concern with us or complain to the Information Commissioner's Office (ICO).

These rights are subject to the conditions and exemptions set out in data protection law. For example, the right to erasure is not absolute, and we may need to retain certain information to meet a legal obligation or for another lawful purpose.

We will consider each request on its individual merits and explain our decision where required by law.
To exercise your rights, please contact our Data Protection Officer using the details in Section 10.

9. Complaints

We take concerns about the collection, use, storage and sharing of personal data seriously.

If you are concerned about how we have used your personal data, you can contact our Data Protection Officer using the details in Section 10. We will consider your concern and respond in accordance with our procedures and applicable data protection law.

You also have the right to complain to the Information Commissioner's Office (ICO), which is the UK's independent data protection regulator. You do not have to raise your concern with us before contacting the ICO.

You can contact the ICO using the following details:

- **Online:** https://ico.org.uk/make-a-complaint/
- **Telephone:** 0303 123 1113
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Further information is available at https://ico.org.uk/.

10. Contact us

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact the **data protection officer**:

Paul Withers- DPO
Information Governance and Assurance
Walsall Council
Civic Centre
Darwall Street
Walsall
WS1 1TW
Phone number: 01922 650970
Email: schoolsdpo@walsall.gov.uk

Each academy's Data Protection Lead supports the day-to-day management of data protection matters within the academy.

For questions about this privacy notice, or to exercise your data protection rights, please contact the Data Protection Officer using the details above. You may also contact the relevant academy's Data Protection Lead for assistance, who will refer the matter to the appropriate person where necessary.