



St George's
School Edgbaston

PRIVACY POLICY FOR ALUMNI

Revised: July 2018



Who are we?

We are St George's School and our address is 31 Calthorpe Road, Edgbaston, Birmingham, B15 1RX. We are the data controller of personal information about you.

If you have any questions about this policy or how we are using your personal information, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

What is this privacy policy about?

This privacy policy tells you how we use your personal information once you are no longer a pupil at our School and you have joined our alumni network. This privacy policy answers the following questions – please click on the heading to take you to the section of this privacy policy that you would like to read:

What personal information do we keep about you when you leave our School for alumni purposes?	2
How do we use your personal information?.....	2
What is our legal basis for using your personal information?	2
Do we use your personal information to make automated decisions?	2
How long will we keep your personal information?	3
Who will we share your personal information with?	3
Will we transfer your personal information outside the European Economic Area?	4
Your rights over your personal information.....	4
How we'll tell you about changes to this privacy policy.....	5

What personal information do we keep about you when you leave our School for alumni purposes?

After you have left the School, we will keep some personal information about you. This will be your: name; address; contact details; exam results; notable achievements and destination i.e. where you have gone when you have left us.

We may also keep and use photos of you to celebrate your educational achievements. These will be displayed on work boards, publications and our website.

We also have CCTV on our premises for security and safeguarding reasons, to record any injuries and accidents sustained on School grounds and for identification purposes and may therefore collect images of you on our CCTV systems if you come back to visit us.

How do we use your personal information?

We will use your personal information to:

- provide information to inspectors during an inspection and to the Local Authority;
- keep track of achievements;
- invite previous students back to the School for assemblies and presentations; and
- display achievements on the School's website and other publications.

What is our legal basis for using your personal information?

Under data protection laws, we need to have a legal reason or basis to use your personal information. We have explained these in this section.

We use your personal information on the basis that we believe that by keeping in touch with you and developing our alumni network we are acting in our legitimate interests and in such a way which you would reasonably expect. Please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk if you would like further information on our legitimate interests.

Do we use your personal information to make automated decisions?

You will not be subject to decisions that will have a legal or significant impact on you based solely on automated decision-making which means there will always be human involvement in the decisions that we make about our alumni and we don't make decisions using only computer technology.

How long will we keep your personal information?

We would like to keep track of the progress you make when you leave our School. We will keep the personal information that we have about you permanently so that we can continue to stay in touch with you and keep updated on your progress. Should you decide that you no longer wish to hear from us, we will ensure that your personal information is securely deleted.

For further information on how long we keep your personal information or to request that it is deleted please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

Who will we share your personal information with?

We will only share the personal information that you give us with the following third parties and for the following reasons:

- **With third parties who provide or support our IT systems:** We use reputable third parties to provide us with our IT systems and support for them, e.g. SIMS and CPOMS. They may access your personal information to the extent that they need to in order to provide their services or provide support to us as our processor;
- **With an organisation that we merge with or transfer our School's assets to:** In the unlikely event that we sell all or part of our School, or merge with another school, we may transfer personal information that we have collected as described in this privacy policy, along with our other School assets, to the organisation that we are selling to or merging with. The legal ground for this is that it is in our legitimate interests to be able to merge or sell our School. Please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk if you would like further information on our legitimate interests;
- **With entities, companies or individuals outside our School for legal reasons:** We will share your personal information with entities, companies or individuals outside St George's School where it is necessary to comply with any law, rule, regulation, legal procedure or governmental request that is applicable to us, for example sending information about our School to the Department for Education. The legal ground for this is that sharing your personal information in this way is necessary in order for us to comply with our legal obligations;
- **With entities, companies or individuals outside our School to obtain advice:** We also share your personal information with external professional advisors such as lawyers or accountants in order to take advice and for the purposes of legal and tribunal proceedings. The legal ground for this is that it is in our

legitimate interests as a School to be able to obtain professional advice from our external advisors about issues that may arise within our School. Please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk if you would like further information on our legitimate interests;

Will we transfer your personal information outside the European Economic Area?

We store your personal information in the United Kingdom or in countries within the European Economic Area ("EEA").

We will only transfer your personal information outside the EEA where our third party service providers who we share personal information with (as set out above) are based outside the EEA, have support services located outside the EEA or host personal information outside the EEA.

We only transfer your personal information outside the EEA where we have a legal ground for doing so and where we ensure that your personal information is protected to the same standard as it would be protected in the UK. We do this by entering into data sharing agreements with the recipients of your personal information based outside the EEA which comply with the EU Commission's standard clauses for the transfer of personal information, or where the third party is based in the US and is part of the US Privacy Shield.

If you would like further details about our transfer of your personal information outside the EEA please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

Your rights over your personal information

You have a right to make a complaint at any time to the Information Commissioner's Office (ICO), (the UK regulator for data protection issues. See <https://ico.org.uk/>). We would, however, appreciate the chance to deal with your concerns before you approach the ICO and so, if you are happy to do so, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk in the first instance and we will try to resolve your issue.

You have a number of other rights over your personal information, which are:

- the right to ask us what personal information we have about you and to have a copy of your personal information from us;
- the right to ask us to correct any errors in your personal information;

- the right to object to our legitimate interests and our profiling activities where these are based on our legitimate interests;
- the right to object to us sending you marketing communications;
- the right to ask us to provide you with a copy of the personal information you have provided to us, in a structured, commonly used and machine-readable format and the right to transmit that personal information to another entity where: (i) we are using your personal information on the basis of your consent or on the basis that it is necessary to perform a contract with you; and (ii) the use we are making of your personal information is carried out by automated means;
- the right to ask us to delete your personal information where: (i) we don't need your personal information anymore; (ii) you withdraw your consent to our use of your personal information and we have no other legal basis to keep your personal information; (iii) you have asked us to review and explain our legitimate interests to you and we don't actually have a valid legitimate interest to do what we are doing; (iv) our use of your personal information is illegal; (v) we have to delete your personal information to comply with our legal obligations;
- the right to ask us to restrict the use that we are making of your personal information where: (i) you don't think the personal information we have about you is correct, so that we can check if it is correct; (ii) what we are doing with your personal information is illegal but you would rather we stop using your personal information rather than delete it; (iii) we don't need your personal information anymore, but you need us to keep it so that you can exercise any legal rights; and (iv) you have asked us to review and explain our legitimate interests to you, so that we can check whether we actually have a valid legitimate interest to do what we are doing;
- the right to ask us to transfer your personal information in certain circumstances; and
- where the use of your personal information is based on your consent, the right to withdraw your consent at any time by contacting us at dpo@sgse.co.uk.

If you would like to exercise any of these rights over your personal information, please contact our Data Protection Officer Mr L Nicholas at dpo@sgse.co.uk.

How we'll tell you about changes to this privacy policy

We keep our privacy policy under regular review. Any changes we make to our privacy policy will be published in an updated privacy policy on our website. Any major changes to this document will be communicated to you via email.