



ASCENSION
CATHOLIC ACADEMY TRUST

Ascension Catholic Academy Trust (ACAT)

Privacy Notice for Alumni and School Leavers

Approved by ACAT Board: March 2023

How we use Alumni & School Leaver Information

Under data protection law, individuals have a right to be informed about how ACAT 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 individuals who join our alumni organisation.

ACAT is the 'Data controller' for the purposes of data protection law.

We have appointed Grow Education Partners Ltd as our Data Protection Officer (DPO) and the responsible contact is David Coy (see 'Contact us' below).

1. The personal data we collect and hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Personal Information (such as name, date of birth, dates you attended school);
- Contact details (such as telephone number, email address, postal address);
- Financial Information (such as banking details);
- Information about career and academic achievements;
- Close Circuit Television (CCTV) footage;
- Photographs (such as on the website, twitter or for other promotional purposes).

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities, and the Department for Education.

2. Why we collect and use this information

The purpose of processing this data includes but is not limited to:

- To inform you about events and other things happening in ACAT schools;
- To assess the quality of our services;
- To comply with the law regarding data sharing;.

3. The lawful basis on which we use this information

Are defined under data protection legislation and for personally identifiable information are:

- Data subject gives consent for one or more specific purposes;
- Processing is necessary to comply with the legal obligations of the controller;
- Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education);
- Processing is necessary for your legitimate interests or the legitimate interests of a third party.

A full breakdown of the information we collect on alumni can be requested by contacting ACAT via admin@ascensioncat.org.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

4. Collecting this information

All former pupils are automatically part of our alumni organisation however this is voluntary, and you can opt out and leave at any point.

As an alumnus, there is some information which we will need from you to facilitate the services we provide.

Whenever we seek to collect information from you, we make it clear whether the information is integral and what the consequences are if it is not supplied.

5. How we store this data

To protect your data, we have data protection policies and procedures in place, including strong organisational and technical measures, which are regularly reviewed. Further information can be found in our Data Protection Policy or upon request.

Alumni information is held in a secure database and used for purposes directly relevant to the work of ACAT alumni organisations.

When your relationship with ACAT has ended, we will retain and dispose of your personal information in accordance with our Data Retention Schedule.

6. Data sharing

In order for us to legally, effectively and efficiently function we are required to share data with appropriate third parties, including but not limited to:

- Suppliers and service providers, to enable them to provide the service we have contracted them for, such as governor support and IT;
- Our auditors to ensure compliance with our legal obligations;
- Trade Unions and Professional Associations, to enable them to provide the service their members require;
- Professional advisors and consultants, for us to develop our services and best provide our public service;

- Employment & recruitment agencies and future employers to support reference requests;
- Police forces, courts, tribunals, security services, to create a secure workplace for all at ACAT schools;
- Charities and voluntary organisations.

7. Transferring data internationally

We may send your information to other countries where:

- we or a company we work with store information on computer servers based overseas;
or
- we communicate with you when you are overseas.

We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA.

The UK and countries in the EEA are obliged to adhere to the requirements of the GDPR and have equivalent legislation which confer the same level of protection to your personal data.

From organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.

Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

8. Data Protection Rights

Individuals have a right to make a **'subject access request'** to gain access to personal information that ACAT holds about them.

Parents / carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it;
- Tell you why we are holding and 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;
- NOT provide information where it compromises the privacy of others;
- 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.

In most cases, we will respond to subject access requests within 1 month, as required under data protection legislation. However, we are able to extend this period by up to 2 months for complex requests or exceptional circumstances.

We reserve the to verify the requesters' identity by asking for Photo ID. If this proves insufficient, then further ID may be required.

Your Other Rights regarding your Data:

- Withdraw your consent to processing at any time (This only relates to data for which ACAT relies on consent as a lawful basis for processing);
- Ask us to rectify, erase or restrict processing of your personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied;
- Prevent the use of your personal data for direct marketing;
- Challenge processing which has been justified on the basis of public interest, official authority or legitimate interests;
- Request a copy of agreements under which your personal data is transferred outside of the European Economic Area;
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect you);
- Request a cease to any processing that is likely to cause damage or distress;
- Be notified of a data breach in certain circumstances;
- Submit a complaint to the ICO;
- Ask for your personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

ACAT will comply with the Data Protection legislation in regard to dealing with all data requests submitted in any format, although individuals are asked to preferably submit their request in written format to assist with comprehension.

If you would like to exercise any of the rights or requests listed above, please contact ACAT via admin@ascensioncat.org, who will forward your request to the CFO. We will provide a form for you to complete that requests the information we will need to act on a request.

We reserve the to verify the requester's identification by asking for Photo ID. If this proves insufficient then further ID may be required.

9. Data Protection Breaches

If you suspect that your or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction or damage, we ask that you please contact the ACAT CFO via admin@ascensioncat.org and advise us without undue delay.

10. Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our independent Data Protection Officer, David Coy via admin@ascensioncat.org.

Alternatively, you can refer a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>.
- Call 0303 123 1113.
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

11. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact either the ACAT CFO via admin@ascensioncat.org or our independent Data Protection Officer, David Coy (Email: david.coy@london.anglican.org Tel: 07903 506531).