

PRIVACY NOTICE FOR ALUMNI

1. WHAT THIS PRIVACY NOTICE IS FOR

d'Overbroeck's is a "data controller" under data protection law. This means that we are responsible for deciding how we hold and use personal information about you. This Privacy Notice tells you how we do that and sets out your rights when it comes to the information that we hold about you.

Your privacy is important to us and we want to keep your personal information safe. The school holds only information we are permitted to hold, and uses it only for purposes you have consented to in the Alumni Consent Form.

2. ABOUT THE SCHOOL

d'Overbroeck's does not have a separate alumni association. Instead, we keep in touch with alumni directly and we work with our parent company, Nord Anglia Education, to do so. More information about who we are can be found on our website www.doverbroecks.com.

3. THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal information is information that identifies you as an individual and relates to you. This includes the following:

- personal contact details such as your name, title, addresses, telephone numbers, and personal email addresses;
- date of birth;
- information you provide us with in the course of our communications with you, such as your education, qualifications, and employment;
- family connections with other alumni or relations at the school;
- personal news that you chose to tell us, such as marriage and children;
- if you contact us via LinkedIn, the information you have posted there;
- details of visits to our websites (including use of any educational tools) and information collected through
 cookies and other tracking technologies including, but not limited to, IP address and domain name,
 browser version and operating system, traffic data, location data, web logs and other communication
 data, and the resources that are accessed and associated telemetry data (eg, how long you spent
 watching a video);
- photographs and images of you; and
- quotes and feedback from you about your time at the school.

4. HOW WE COLLECT AND USE YOUR PERSONAL INFORMATION

We collect personal information from the main school database and from the completed Alumni Consent Form. We may also collect data about you from public sources, such as LinkedIn, your visits to our websites, or search engines such as Google, in order to ensure that the data we hold about you is up to date.

We use your data only for processes that allow the school to fulfil a legal obligation, to fulfil a contract obligation, to fulfil legitimate interests (to enable us to perform our obligations and improve our services), or for which we have your consent.

If you have consented via the Alumni Consent Form, or via cookies or similar technologies, we use your personal information:

- to keep in touch with you in the manner you have indicated on the school's Alumni Consent Form. This may include marketing and development communications;
- to ask you to help with careers advice, mentoring or work experience for existing pupils;
- to ask you to complete surveys about the school and other related matters;
- to share with others, in all media, for promotional, marketing and fundraising purposes. This may include
 your image, full name, information about your education and career, and other information held by the
 school.

Your duty to inform us of changes

If you move house, change your email address, telephone number or other personal details, it is important that you let us know so that the information we hold is accurate.

5. SHARING YOUR DATA WITH OTHERS

We share your data with those staff of the school who administer and manage relationships with alumni.

We also share your data with third parties such as service providers, including our website hosting provider.

We share your information with our parent company, Nord Anglia Education, as they help us keep you updated. They also help us promote the school and its events on our website and social media platforms. We may also share your data with other third parties where we are required to do so by law. These might include the Independent School's Inspectorate, the Charity Commission, Ofsted, or other regulators.

We are a global network of schools and your Personal Data may be transferred to, stored in or accessed by staff or suppliers in, a destination outside the UK/European Economic Area (EEA). Regardless of location, we will impose the same data protection safeguards that we deploy inside the UK/EEA. If you want to understand more about where your personal data is located, please contact us in writing (see section 11).

6. HOW WE SECURE YOUR INFORMATION WHEN OTHERS USE IT

All our third-party service providers have to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only allow them to use your personal data for specified purposes and in accordance with our instructions.

7. DATA SECURITY

We protect the security of your information. If you want to know how we do that, please contact us in writing (see section 11).

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only use your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

8. DATA RETENTION

The school will keep your personal information securely and only for as long as it is necessary for a legitimate and lawful reason. When we do not have a lawful reason to hold it, we will delete or destroy your personal information securely. If you decide to withdraw your consent to us processing your personal data, we will retain only your name and basic contact details, so that we can ensure that we do not attempt to make any further contact with you.

In some circumstances we may anonymise your personal information so that it can no longer be linked to you. If we do this, we may use such information without telling you.

For further information about data retention, please see our Data Retention Policy, available from our <u>website</u> or on request from the school office.

9. YOUR RIGHTS

You have the following rights in connection with your personal information:

- **Subject Access** you may ask to see a copy of any personal data we hold about you. This information will generally be provided within one month of us confirming your identity and understanding the scope of your request;
- Rectification you may ask for your personal information to be amended or incomplete data completed;
- **Erasure** you may ask for your personal information to be deleted;
- **Restriction** you may ask for us to limit the processing of your personal information in some circumstances, for example, whilst we resolve a complaint. Restriction means that although we still store the data, we will not process it (or will not process it for certain purposes) until such time as the restriction may be lifted;
- **Portability** you may ask for a copy of any personal data you have provided to us to be returned to you, or transmitted to another controller, in a commonly used machine readable format;
- **Objection** you may object to us processing your personal information, unless there are legitimate grounds on which we can rely to process it;

If you want to do any of the above, please contact us in writing (see section 11). The school will endeavour to respond to any such requests as quickly as reasonably practicable, and in any event within statutory time-limits, which is one month in the case of requests for access to information.

Your right to withdraw consent

Where you have told us that we can use your personal information, you can withdraw this consent at any time. If you do wish to withdraw your consent, please contact us in writing (see section 11).

10. CHANGES TO THIS PRIVACY NOTICE

We may update this notice from time to time and publish a new version on the <u>Privacy Notices page</u> of our website. We may also notify you in other ways from time to time about the processing of your personal information.

11. CONTACTS AND COMPLAINTS

If you have any questions about this privacy notice or how we handle your personal information, or if you wish to exercise any of your rights under applicable law, please contact the Data Compliance Administrator via tracy.roslyn@doverbroecks.com.

If you are not satisfied with how we are processing your personal data, or how we deal with your complaint, you can make a complaint to the Information Commissioner's Office (ICO) www.ico.org.uk, the UK supervisory authority for data protection issues. The ICO recommends that you take steps to resolve the matter with the school before involving them.

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