PRIVACY NOTICE - Alumni

INTRODUCTION

Heathfield Community College is a 'data controller' for the purposes of the Data Protection Act (2018) & UK GDPR as amended by the Data Use & Access Act 2025. We collect and hold a small amount of personal data on our alumni.

We ensure that your personal information is:

- processed legally
- processed fairly
- correct
- stored safely
- kept for no longer than needed (see our retention schedule on the College website http://www.heathfieldcc.co.uk/?page_id=1595711)
- is deleted as soon as possible after receiving notification that you no longer wish to be on our Alumni database

This document describes:

- why we collect data about you
- what data we collect
- what we do with the data we collect
- what your rights are.

WHY DO WE COLLECT INFORMATION ABOUT ALUMNI?

The legal basis for collecting your information is as follows:

- we have a legal obligation for the safeguarding of students when you are in College
- you give your consent for us collecting and using your information & you give us your explicit consent for processing of special category data is in the substantial public interest. If we need your consent we will always tell you in advance.
- we are required to for reasons of "public health", for example during a pandemic
- preserve the College's history and collective memory

Please see the school's Special Category Data policy for more information about how we process this type of data. This policy can be found on the Data Protection page of the College website here: http://www.heathfieldcc.co.uk/?page_id=1595711

More specifically we collect and store information about alumni to:

- enrich our offer to our current students
- to allow ex-students to stay in touch with the college.

Where we keep records and information containing personal data for a longer time, we do this for archiving purposes in the public interest. We keep these records to preserve the school's history, key events and collective memory. We will provide access to these records for research or statistical purposes, taking reasonable measures to protect the personal data they may contain.

WHAT INFORMATION DO WE COLLECT ABOUT ALUMNI?

We ask for your name, email address for contact purposes, your photo to use in displays, details of your chosen career and / or educational path after leaving Heathfield and to ensure you are kept safe whilst on site we ask for information about any allergies that you might have. Whilst on site your image may be recorded on our CCTV.

HOW DO WE STORE YOUR DATA AND FOR HOW LONG?

Your data is stored securely in line with our policies on data protection and online safety and IT security. We keep your data only for as long as we need to process it. The document that guides for how long we keep specific types of data is called our retention schedule. The retention schedule can be found on the

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data protection page of the College website: http://www.heathfieldcc.co.uk/?page_id=1595711

DO WE SHARE ALUMNI INFORMATION?

We may use Artificial Intelligence (AI) tools to help us work more efficiently with your personal data. When we do so, we only use those tools that do not include the user inputs as part of their learning processes. In all other circumstances, we only share your information internally unless you have given your consent to do otherwise in advance. For example, with your consent we may use your image and name in the ways summarised in Appendix A.

TRANSFERRING DATA INTERNATIONALLY

We do not store or transfer your data outside of the College apart from when using our management information system (Arbor) or UNLESS you use email to contact us OR we use AI enhanced tools to process your data. In the latter case the data will be temporarily transferred to the USA before being deleted by the AI tool. Our management information system is stored in the 'cloud'. Cloud based data will be held in a UK-based AWS datacentre (certified to ISO 27001). All incoming emails are eceived by us after having been transferred to a malicious email filtering system that may involve a temporary transfer of all emails outside of the UK and EEA. We do this to reduce the risk of the College IT systems being attacked by malicious outside forces. We never use such services unless their privacy policies for doing this are compliant with UK law. Where other cloud based data is stored outside of the UK we also ensure that that personal data is protected in the same way that it is in UK law.

WHAT ARE YOUR RIGHTS?

There are circumstances when these rights don't apply, for example if a law says we need to keep specific pieces of information, or if not processing the data places a student in danger. Your rights are:

- **The right of access** (a "Subject Access Request"). This means you can ask for a copy of the data we hold about you. Contact details for this are found below. We will comply within ONE calendar month. In order to do so, please complete and return a Subject Access Request Form – here. In order to exercise your other rights, please complete and return an Individual Rights Form - here
- **The right to be informed.** This means that we will tell you when we are collecting data about you and what it is being used for.
- **The right to rectification**. This means you can ask us to fix omissions and errors in your data
- **The right to erasure**. This means that you have the right to have information we hold deleted.
- **The right to restrict processing**. This means we can still hold the data, but can't use it.
- **The right to object**. This means you can object to processing of personal data under certain circumstances. If we had to ask for your consent, you can withdraw consent at any time. Consent can be withdrawn by writing to the address below.

If you have a concern about the way we are collecting or using our alumni personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/

HEATHFIELD COMMUNITY COLLEGE DATA PROTECTION OFFICER CONTACT INFORMATION

Data Protection Officer contact details: Sarah Oxenbury, Children's Services, East Sussex County Council. Schools.dpo@eastsussex.gov.uk

REQUESTING ACCESS TO YOUR PERSONAL DATA

In the first instance, you should **contact the Data Protection Lead** in writing at the address below. Subject access and other information requests should be made on the appropriate form and you will need to provide appropriate identification. Forms and guidance can be found on the Data Protection page of the website - here. If you wish to contact us by email, please email DataProtection@heathfieldcc.co.uk . Please DO NOT contact the main office email address as we cannot guarantee your email will reach its intended destination in a timely way.

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The Head Teacher / Data Protection Lead
Heathfield Community College
Cade St
Heathfield
East Sussex
TN21 8RJ
Tel: 01435 866066

Appendix A: When we might share your personal information

The following are the ways in which we may share your image and / or name and / or destinations data:

- college promotional materials for the sixth form and the main College
- college parental communication eg the parent newsletter
- college social media accounts
- the internet, eg the College website & social media sites eg Twitter, Facebook, YouTube
- local and national press & media releases
- internal displays around the College
- our local authority, the Department for Education (DfE) & Ofsted – to meet our legal obligations to share certain information, such as safeguarding concerns.
- promotional materials on the College website.
- learning and career progression materials for supporting our students through our virtual learning platform
- suppliers and service providers – to enable them to provide the service we have contracted them for, such as governor clerk
- we may share your information with the Police, if they ask us to do so