

ALUMNI & SUPPORTER PRIVACY POLICY

CATEGORY	External Relations
POLICY OWNER	Director of Operations and Sustainability
DATE & VERSION	18-08-2022 - Version 2.1
APPROVED BY	Principal
REVIEW FREQUENCY	Annual

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1. Policy Purpose

United World College of the Atlantic Limited (company number 00673076) is a company registered in England and Wales and is referred to as "UWCA", "we", "our" or "us" in this privacy notice.

This Privacy Notice aims to give you information on how we collect and process personal data and is intended to ensure that personal information is dealt with in accordance with the General Data Protection Regulation (GDPR). It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically.

2. Policy Statement

This policy applies to alumni of UWC Atlantic (the College) or other individuals who are in communications with the College or support UWC Atlantic financially or non-financially.

3. Policy Implementation

3.1 Roles & Responsibilities

All staff involved with the collection, processing and disclosure of personal information will be aware of their duties and responsibilities by adhering to these guidelines.

This privacy notice covers:

- how we use data;
- what personal data we collect;
- how we ensure privacy is maintained;
- legal rights relating to personal data.

3.2 Why we collect and use personal data

The personal data we hold is essential in order for the College to keep in touch with our valued alumni and supporters, and to ensure we continue to develop our relationship in delivering the UWC mission and values.

We collect and use information to:

- develop a better understanding of our alumni and supporters
- Enable us to keep in touch with you

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- keep you apprised of our activities and developments
- invite you to alumni and other college events
- provide services to you
- identify ways in which you can support us, through donations or other forms of financial and non-financial support
- enable connectivity amongst our alumni and supporters as part of the wider UWC Atlantic community
- meet the statutory duties placed upon us

Under the General Data Protection Regulation (GDPR), data will be processed and retained for the purposes listed above. The College will therefore have a 'legitimate interest' for processing and retaining personal data and sensitive personal data. The data the College holds will be the minimum required to maintain our ongoing relationship.

3.3 What personal data we collect

The categories of information that we process include:

- details of your UWC Atlantic education or your relationship with the College
- personal identifiers, contacts and characteristics (such as name, unique student number and contact details)
- characteristics (such as nationality, language, financial background)
- attendance at college events - medical, welfare and administration (as applicable for attending college events)
- details of related parties (such as family/spouse information)
- your communication preferences to help us provide tailored and relevant communications - images (including digital images for identification, photographs, CCTV for security purposes)
- philanthropy profile (including your history of donations and support)

3.4 Sensitive personal data

Data protection law recognises that certain categories of personal information are more sensitive than others. This type of information is only collected where there is a clear reason for doing so.

3.5 How we use data

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Collecting information

Personal data is essential for the College's operational use. We obtain the information the College requires from your previous student records and/or the details that you provide to us. Additionally, information may also be received from the following sources:

- UWC International Office
- UWC National Committees
- other UWC colleges
- event attendance records
- media/press sources, publications and, other publicly available sources
- referral from other supporters
- UWC Atlantic Class Representatives

Should we require sensitive personal information from other sources we will contact you.

Who we share information with

We may need to disclose your information to the parties listed below. This is so that we are able to provide our services to you and to the College. We will not disclose your personal data to any other third party. Where this is required, the College ensures that the data recipient adheres to adequate data protection requirements. Such instances could include:

- UWC International Office
- UWC National Committees
- other UWC colleges
- approved service providers (such as event organisers, caterers, travel, other service providers)
- alumni co-ordinators for UWC events
- UWC Atlantic Class Representatives

3.6 How we protect your data

UWC Atlantic is committed to keeping personal data safe and secure. This includes using a range of ICT security measures, access controls, and internal policies setting out our data protection approach and associated training for employees.

We also have procedures in place to deal with any suspected data security breach. We will notify affected parties and any applicable regulator of a suspected data security breach where

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we are legally required to do so.

3.7 How long we keep your data

Your personal data will only be kept until it is no longer needed.

3.8 Individual Rights under GDPR

In addition to providing a legal basis for processing data, the GDPR provides the following rights for individuals:

- **The right to be informed:** We will provide concise, transparent, intelligible and easily accessible information about the processing of personal data to individuals using this Privacy Notice.
- **The right of access:** Where requested, we will provide individuals with access to their personal data held. This will be processed as a Subject Access Request, and we will provide a copy of the information free of charge (unless a request is clearly excessive or unfounded), within one month of the request.
- **The right to rectification** We are committed to rectifying personal data if inaccurate and will respond to a request for rectification within one month of receiving the request.
- **The right to erasure** The College will consider individual requests for deletion or removal of personal data where there is no compelling reason for its continued processing, in line with the conditions set out in the regulation. The College will inform relevant third parties of erasure of personal data; unless it is impossible, or involves disproportionate effort to do so.
- **The right to restrict processing** We will ensure that data processing is restricted in any of the following circumstances:
 - Where an individual contests the accuracy of personal data until the accuracy is verified
 - Where an individual has objected to the processing
 - When processing is unlawful If data processing is restricted, we will notify any relevant third parties.
- **The right to data portability** We will comply with individual requests to allow an

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individual to obtain and reuse their personal data for their own purposes across different services.

- **The right to object** We will comply with an individual’s right to object to processing of their personal data based on legitimate interests (to ‘opt out’) or the performance of a task in the public interest/exercise of official authority. We will inform individuals of their right to object using this Privacy Notice.
- **Rights in relation to automated decision making and profiling** We will adhere to GDPR requirements which specify that automated decision making or automated processing of personal data (without any human involvement), including profiling, can only be carried out where this type of decision making is necessary for a legal contract or based on the individual’s consent.

4. Related Information

4.1 Related Policies

[Data Protection Policy](#)

4.2 Contacts

The Director of Operations and Sustainability is appointed as the Data Controller.

The Data Controller will also act as the contact point for any requests for personal data, or any complaints in relation to the processing of personal data.

Further advice and information is available from the Information Commissioner’s Office: www.ico.org.uk Telephone: +44 (0)303 123 1113

5. Policy Measurement and Reporting

The Alumni & Supporter Privacy Policy is reviewed annually by the External Relations Committee of the Board and the Director of Operations & Sustainability, as part of the policy review cycle and as part of the whole College development plan. Part of this review process will consider to what extent the policy is being used as an active working document.

The policy is communicated to the school community electronically on **Every** and is available on the UWCA website.

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