

# St Thomas More Alumni



## PRIVACY NOTICE

### OVERVIEW

**Our Intent.** We are committed to safeguarding the privacy of our members. The Alumni will only use the information that we collect about you lawfully and in accordance with the Data Protection Act 1998 (the "Act").

**Changes to Data Protection Legislation.** Data Protection legislation and the Act is currently going through a period of change. The introduction of the European Union's General Data Protection Regulation (GDPR) and the new British Data Protection Bill, that will replace the Act and is currently passing through Parliament is the basis of this change. This Privacy Notice is therefore intended to comply with the Act and GDPR but may change over time.

**Member's Terms & Conditions.** This Privacy Notice, forms part of Terms & Conditions for being a member of the Alumni. In legal terms, members are "Data Subjects," i.e. "you." We may also collect personal information regarding your spouse and dependents if appropriate.

### DATA CONTROLLER, DATA PROTECTION OFFICER AND DATA PROCESSING

**The Data Controller.** The St Thomas More Alumni is from a legal perspective classed as the 'Data Controller'.

**Data Protection Officer (DPO).** Due to the size of membership, St Thomas More Alumni's has not appointed a DPO. However if you have any issues, the formal mechanism for members to raise concerns regarding the processing of personal data is primarily to contact the Alumni as detailed on our website (<http://www.stmalumni.co.uk/index.php/contact-us>) at which point the inquiry will be actioned.

**Purpose of Processing Personal Data.** We collect personal data primarily to support and advance St Thomas More Alumni, our membership, the school and raise money and support charitable and educational works.

**Lawful Basis of Processing Personal Data.** The lawful basis of processing your personal data is as follows:

- **Consent.** Once you have agreed to this Privacy Notice of our Terms & Conditions, you will be registered for the processing of your personal data, based upon your Consent.

### PERSONAL DATA

**Categories of Personal Data Processed.** The information we hold should be accurate and up-to-date. The personal information which we hold will be held securely in accordance with our internal data protection and security policies. The type or categories of personal data we will collect about you includes your:

- Full Name
- Postal address (this may be your home and/or business address)
- Email address (this may be your personal and/or business email address)
- Telephone number (this may be your Mobile and/or landline telephone numbers)
- Other information as disclosed on your application form for membership (i.e. date of birth, status, qualifications)

Minutes of meetings and records of decisions may include your name and other information about you.

**Category of Recipients of Personal Data.** Your name and contact details will primarily only be used internally within St Thomas More Alumni. However, if you participate in a dinner, or a similar event, we will normally have to provide your name and possibly other details to other stakeholders.

**Transfer of Personal Data Outside the EEA (European Economic Area).** Personal data will only be transferred outside the EEA or other areas of adequacy determined by the EU, for specific events. If this is required, consent will be explicitly requested from you.

**Sensitive Personal Data.** We will never collect sensitive personal data about you without your explicit consent and a clear explanation why it is required.

**Spouse, Partner and Children Personal Data.** If we hold personal data about a member's spouse or partner, we will ask for consent from the spouse or partner for this. For member's children, under the age of 18 years old, we will assume parental consent.

**Sale or Passing of Personal Data to Third Parties.** We will not sell or pass your personal data to any commercial or charitable organisation.

**Retention of Personal Data.** We will retain your personal data as follows:

- **Information Held Under Consent.** We will retain your personal data whilst you are a member of the Company. Upon leaving, we retain your name and relevant details to support our historical records.

## YOUR RIGHTS AS A DATA SUBJECT

Under the Act and even more so under the GDPR you have a number of Rights which we have outlined below:

**Right of Access.** You are entitled to access your personal data so that you are aware of and can verify the lawfulness of the processing. This is achieved through the mechanism of a Subject Access Request (SAR) and you have the right to obtain:

- Confirmation that your data is being processed (held);
- Access to your personal data (a copy); and
- Other supplementary information that corresponds to the information in this privacy notice.

**Fees and Timings.** Under GDPR and from 25 May 2018, this information will be provided without charge; without delay and within one month. If an extension is required or requests are considered manifestly unfounded or excessive, in particular because they are repetitive, the St Thomas More Alumni may choose to: charge a reasonable fee taking into account the administrative costs of providing the information; or refuse to respond. The reasons for this will be formally notified to you and your rights to appeal to the appropriate Supervisory Authority, i.e. UK Information Commissioner's Office (ICO) will be highlighted.

**Identify Verification.** To protect your personal data, the St Thomas More Alumni will seek to verify your identity before releasing any information, which will normally be in electronic format. As a member this will normally be a simple process, however if the SAR is made from a member living overseas, or former member, or by the relative of a deceased member, then additional verification steps are likely.

**Right of Rectification.** You are entitled to have personal data rectified if it is inaccurate or incomplete. The St Thomas More Alumni will respond within one month of your request. In the unlikely event the St Thomas More Alumni does not take action to the request for rectification, we will inform you of your rights to complain or seek judicial remedy.

**Right of Erasure.** You may request the deletion or removal of personal data where there is no compelling reason for its continued processing. The Right to Erasure does not provide an absolute *'right to be forgotten'*. However, you do have a right to have personal data erased and to prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
- When you withdraw consent
- When you object to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- The personal data has to be erased in order to comply with a legal obligation

**Right to Restrict Processing.** Under the Act, you have a right to *'block'* or suppress processing of personal data. The restriction of processing under the GDPR is similar. When processing is restricted, the St Thomas More Alumni is permitted to store the personal data, but not further process it. In this event exactly what is held and why will be explained to you.

**Right to Data Portability.** You may request to obtain and reuse your personal data for your own purposes across different services. This allows you to move, copy, or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability. The Right to Data Portability only applies:

- To personal data you have provided to St Thomas More Alumni
- Where the processing is based on your consent or for the performance of a contract and
- When processing is carried out by automated means.

In these circumstances the St Thomas More Alumni will provide a copy of your data in CSV format and/or PDF free of charge, without undue delay and within one month. If there is a delay to this, you will be informed.

**Right to Object.** You have the right to object to:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling)
- Direct marketing (including profiling) and
- Processing for purposes of scientific/historical research and statistics.

The St Thomas More Alumni does not participate in the first and third activities, however St Thomas More Alumni does conduct marketing activities (i.e. promoting social events to members).

**Automated Decision Making and Profiling.** The St Thomas More Alumni does not employ any automated decision-making or conduct profiling of Data Subjects. However, if you have consented to be held on our Customer Relationship Management (CRM) database we may periodically send you marketing information so that you are informed of upcoming events and roles. These will be automated but they do not involve automated decision-making or profiling.