



Sullivan Upper School

PRIVACY NOTICE

For Alumni, Friends & Supporters

ABOUT US

Sullivan Upper School is the data controller of the personal information we hold about our alumni, friends and supporters. This means that we are responsible for deciding how we hold and use the personal information which we collect.

We are required under the General Data Protection Regulation (GDPR) to notify you of the information contained in this privacy notice.

This notice applies to alumni, friends and former, current and prospective supporters (including volunteers, donors and attendees at events organised by the school). We may update this notice at any time but if we do so, we will inform you as soon as reasonably practicable.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the GDPR.

If you have any questions about this privacy notice or how we handle personal information, please contact the Headmaster, who will deal with your query. The Headmaster can be contacted via his personal assistant, Mrs Amanda Graham, by email at agraham813@c2kni.net or by telephone on 028 9042 8780 or by post to Sullivan Upper School, Belfast Road, Holywood, BT18 9EP.

Our Data Protection Officer is the Education Authority and it monitors the school's data protection procedures to ensure they meet the standards and requirements of the GDPR. Please contact the Education Authority (Data Protection Officer) at:

Email: dpo@eani.org.uk

Tel: 028 8241 1300

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's details are as follows:

The Information Commissioner's Office – Northern Ireland

3rd Floor
14 Cromac Place,
Belfast
BT7 2JB

Telephone: 028 9027 8757 / 0303 123 1114

Email: ni@ico.org.uk

HOW DO WE COLLECT AND HOLD PERSONAL INFORMATION?

Information we hold about alumni, friends and supporters comes from a number of sources. A significant proportion of the information has been provided by you to the school (e.g. by filling out a form in person or on the school website, by making a donation or by corresponding with us via email, social media, telephone or post). If you were a pupil at Sullivan Upper School, some of your information is transferred from your student record to our alumni, friends and supporter database.

We will only ever send you information on events, activities and campaigns by email or text message where we have received your explicit consent to do so.

To augment the information that you provide and to ensure the data we hold about you is accurate we will consult publicly available information sources such as company websites, social media, news articles and Companies House.

WHAT PERSONAL INFORMATION DO WE COLLECT, STORE AND USE ABOUT OUR ALUMNI, FRIENDS AND SUPPORTERS?

Personal information is information that identifies you and relates to you. We will collect, store and use the following categories of personal information about our alumni, friends and supporters:

- Personal information (e.g. name, age, date of birth and photographs)
- Contact details (e.g. postal address, email address and phone number)
- Education history (e.g. school/university attended and dates of study)
- Details of interaction with the school (e.g. attendance at events)
- Family information (such as the name of your partner or spouse and whether your siblings attended the school)
- Personal data provided for a specific purpose (e.g. disability and dietary preferences for event management purposes)
- Communication preferences
- Financial details (e.g. history of donations made to the school, bank account details and payment information)
- Career information (e.g. occupation and achievements – in and outside of work)
- Information relating to relevant hobbies and areas of interest
- Other information (e.g. relationship with other alumni, friends and supporters)

WHY DO WE COLLECT, STORE AND USE THIS INFORMATION?

We will only use personal information when the law allows us to.

In some cases, we may use personal information where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, the school has a legitimate interest in keeping in touch with past pupils to provide them with information and support. The school also has a legitimate interest under its charitable purpose as an education provider to keep in touch with prospective, current and past supporters in order to raise funds.

We keep personal information electronically on the school's information management systems, the school's IT network, or manually in indexed filing systems.

Situations in which we will use personal data include:

- sending you school, alumni and supporter updates (e.g. e-zines and newsletters)
- conducting research (e.g. sending out surveys)
- sending you details of volunteering opportunities
- providing services including access to school facilities
- inviting you to alumni, friends and supporter events
- sending you information relating to fundraising appeals and requests for donations
- analysis and research in order to improve our understanding of our alumni, friends and supporters, inform our fundraising strategy and target our communications more effectively
- internal record keeping, including the management of any feedback
- administrative purposes (e.g. in order to process a donation you have made or to administer an event you have registered for or attended)

If we ask for your consent to use personal information, you can take back this consent at any time. Please contact the school if you would like to withdraw any consent you have given by writing to the Headmaster, who will deal with your query. The Headmaster can be contacted via his personal assistant, Mrs Amanda Graham, by email at agraham813@c2kni.net or by telephone on 028 9042 8780 or by post to Sullivan Upper School, Belfast Road, Holywood, BT18 9EP.

HOW LONG IS THE INFORMATION STORED FOR?

In support of a life-long relationship with Sullivan Upper School we retain alumni, friends and supporter information until an individual tells us that they do not wish to receive further communications from the school and wish their name to be removed from the alumni, friends and supporter database. We will retain some information to ensure our historical records are complete and we do not contact you in future. Consent can be withdrawn at any time by writing to the Headmaster who can be contacted via his personal assistant, Mrs Amanda Graham, by email at agraham813@c2kni.net or by telephone on 028 9042 8780 or by post to Sullivan Upper School, Belfast Road, Holywood, BT18 9EP.

DATA SECURITY

We have put in place appropriate security measures to prevent 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 need to know. They will only process 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 (currently the Information Commissioner's Office) of a suspected breach where we are legally required to do so.

WHO WE SHARE ALUMNI, FRIENDS & SUPPORTER INFORMATION WITH

We may have to share alumni, friends and supporter information with third parties, including third-party service providers and other bodies such as:

- C2K and SIMS (school management information systems)
- Database management companies and data processors to facilitate contact with the current and wider alumni community and supporters of the school (eg ToucanTech, ConnectCo)
- Data systems such as Parentmail, Microsoft Office 365

We will not share your information with anyone without consent unless the law and our policies allow us to do so. We only permit access to personal data for specified purpose and in accordance with our instructions.

TRANSFERRING INFORMATION OUTSIDE THE EEA

We will not transfer the personal information we collect about you to any country outside the EEA without telling you in advance that we intend to do so and what steps we have taken to ensure adequate protection for your personal information in those circumstances.

YOUR RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

Under GDPR, alumni, friends and supporters have the right to request access to information about them that we hold. To make a request for your personal information, please contact the Headmaster in writing.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Under certain circumstances, by law an alumnus, friend or supporter has the right to:

- **Request access** to personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold corrected.
- **Request erasure** of personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the transfer** of your personal information to another party.