

# NCLT ALUMNI PRIVACY NOTICE

The New Collaborative Learning Trust vision is to create a culture of protecting privacy and personal data. Personal data is information which 'relates to and identifies a living individual'. Personal data should be adequate, relevant and limited to what is necessary.

### Who does this notice apply to?

This privacy notice applies to any students enrolled at any of the colleges/schools under the New Collaborative Learning Trust.

#### Data controller and collection

The organisation responsible for looking after your personal data (Data Controller) is the New Collaborative Learning Trust. The Trust is committed to being transparent about how it collects, uses, stores and deletes data and to meeting its data protection obligations. Alumni data can be held centrally at Trust Headquarters or on site.

### Why do we collect and use alumni information?

College leavers automatically enter into our Alumni, your information is stored for 6 years after you have left college. Thereafter we hold your information for a further two years after our last contact with you. We use contact information to maintain contact with Alumni, we use current occupation information to match your background and skills to our careers support for students, we use preference data to ensure we meet your expectations and help us to match where your support can be best placed.

We have a legal duty to report student destinations, other purposes of processing would fall under the following legal basis:

• **GDPR Article 6(1)f -** Processing is necessary for the purposes of the legitimate interests pursued by the controller

If you are an Alumni looking to update your details or join our Alumni mailing list beyond the 6 years after you left college the legal basis would fall under the basis of consent:

• GDPR Article 6(1)a - The data subject has given consent to the processing of his or her personal data for one or more specific purposes

We do not undertake any automated decision making.

### Categories of alumni information

As part of your New College Alumni membership we hold the following information about you:

- Personal information (such as name)
- Contact information (such as email addresses and telephone numbers)
- Current occupation, or study if in full time education
- Date that you left the college
- Preferences for subscriptions to our termly newsletter
- Preferences for engagement to support students (such as whether you are happy to provide talks, mentoring, etc.)

#### Collecting alumni information

We use destinations data provided by students themselves and we collect information via online forms. If you join our Alumni beyond the 6 years after you left college, by completing this form you are providing your consent for NCLT to process your data.

### Storing alumni data

We store most alumni data electronically. We store data for no longer than necessary, in accordance with data protection legislation and best practice. Since you have provided your consent for NCLT to process your data,

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we will look to reaffirm your consent if we do not hear from you in a prolonged period of time (see retention period below).

Alumni information (college leavers)
6 years

Alumni information (beyond 6 years after leaving college)
2 years from the last point of contact

Alumni data which is stored electronically will be held at Trust headquarters or on site. Data which is held in paper format may be stored with our approved archive storage provider, at a location off site but within the UK.

#### Who do we share alumni information with?

We do not share any Alumni information with any organisation or third parties outside of the Trust. Data may be shared internally between colleges. **We will never pass your information to third parties for direct marketing**.

## Marketing (PHOTOGRAPHS AND IMAGES)

Our Alumni service relies on being able to promote success stories of previous New College students. If you have completed our Alumni form and provided your consent for us to process your data, we are likely to approach you about using your image in case studies which may be promoted both internally and externally. In each case we will always seek additional consent from you before we use your image.

### Requesting access to your personal data

Under data protection legislation data subjects have the right to request access to information that we hold. This is known as a subject access request. If any exemptions apply you will be notified. To make a request, please email <a href="mailto:data.protection@nclt.ac.uk">data.protection@nclt.ac.uk</a>.

You also have the right to:

- object to processing of personal data
- prevent processing for the purpose of direct marketing
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- make a subject data access request

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>

#### **DATA PROTECTION OFFICER**

If you would like to discuss, or require clarification regarding this privacy notice, please contact the NCLT Data Protection Officer. Enquiries can be forwarded to <a href="mailto:data.protection@nclt.ac.uk">data.protection@nclt.ac.uk</a> or by calling 01977 702139.