

Privacy Notice Old Queenswoodians' Association (OQA)

Queenswood School holds and processes data centrally on behalf of the OQA. The OQA is the data controller. The School is responsible for ensuring that adequate controls are in place regarding the OQA information it processes. It also provides guidance to the wider OQA organisation regarding their obligations and responsibilities in respect of data protection matters. This includes the processing of data at a local OQ level.

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how the Old Queenswoodians' Association ('OQA') will use (or "process") personal data.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Members are all encouraged to read this Privacy Notice and understand the Association's obligations to its entire community.

This Privacy Notice applies alongside any other information the Association may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to the Association's Constitution and other relevant documents.

Anyone who works for, or acts on behalf of, the OQA (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice.

RESPONSIBILITY FOR DATA PROTECTION

The Chair of the OQA has been appointed as Data Protection Lead 'DPL'. The DPL will deal with any enquiries relating to policy, processes and substantive GDPR issues and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. The Chair may be emailed directly on triciawrinchoq@outlook.com.

Please note that all your routine matters, such as those listed below, should be emailed to qfoundation@queenswood.org:

- requests that personal data that you no longer believe to be relevant is considered for erasure;
- requests to access or amend your personal data;
- request to transfer data to another person or organisation;
- any other objection to how your personal data is used such as requests for photographic images not be published in bulletins etc; and
- withdrawal of consent to receive emails regarding marketing and fundraising information

WHY THE OQA NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to its members, the OQA needs to process a wide range of personal data about individuals (including its membership) as part of its daily operation.

Usage of personal data will be made in accordance with the OQA's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals.

The OQA expects that the following uses will fall within that category of its (or its community's) "legitimate interests":

- To unite and support former pupils of Queenswood School (the 'School') of all generations and staff members, who are also members of the OQA, with each other and with the School;
- To co-operate and assist the School and the Governors from time to time in the promotion of any scheme which the Association considers to be in the interest of Queenswood;
- To maintain an accurate record of those who were educated at Queenswood School. The OQA will process only the minimum personal data to achieve this purpose;
- To make use of photographic images of OQA members in OQA publications, on the school website and (where appropriate) on the OQA's social media channels (if you do not want your photographic image to be used in the aforementioned please email qfoundation@queenswood.org);
- For legal and regulatory purposes and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY THE OQA

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- where appropriate, information about individuals' wellbeing (on any sensitive matters we will seek your permission to hold and process any information);
- pupil destinations after leaving Queenswood School such as information on profession and careers

HOW THE OQA COLLECTS DATA

Generally, the OQA receives personal data from the individual directly. This may be via a form i.e. Sixth Form leavers, or simply in the ordinary course of interaction or communication (such as email and telephone conversation or via the OQA Chronicle).

However in some cases personal data will be supplied by third parties (for example Queenswood School); or collected from publicly available resources.

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE OQA SHARES IT WITH

In accordance with Data Protection Law, some of the OQA's processing activity is carried out on its behalf by third parties, such as IT systems providers, web developers and external mailing houses.

The OQA **will not** share your data with any other Third Parties.

For the most part, personal data collected by the OQA will remain within the OQA, and will be processed on a 'need to know' basis. Information will be shared with duly appointed officers of the OQA, such as Branch and Section Secretaries who are located both within and outside the EU. These Officers are expected to handle and process data in line with this Privacy Notice.

HOW LONG WE KEEP PERSONAL DATA

The OQA will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. The retention period for alumni data will be unlimited as long as the OQA believes it has a relationship to serve with the alumni.

If you have any specific queries about how our retention policy is applied please contact the Chair. If you wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact gfoundation@queenswood.org. However, please bear in mind that the OQA may have lawful and necessary reasons to hold on to some personal data even following such request. For example, a limited and reasonable amount of information will be kept for archiving purposes.

Where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes.

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The OQA will use the contact details of its members to keep them updated about the activities of the school, or alumni and events of interest, including by sending updates and newsletters and the OQA Chronicle publication, by email and by post. Unless the relevant individual objects, the OQA will also:

- Contact members by post and email in order to promote and raise funds for the school (we will obtain members consent to email them on this specific subject);
- With permission from the member, include Alumni Contact details in a ' Business Directory' that is from time to time circulated to its members

Should you wish to limit or object to any such use, or would like further information about them, please contact gfoundation@queenswood.org. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the OQA is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

YOUR RIGHTS

- Rights of access, etc.

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the OQA, and in some cases ask for it to be erased or amended or have it transferred to others, or for the OQA to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, transfer it to another person or organisation or who has some other objection to how their personal data is used, should email the qfoundation@queenswood.org. Alternatively you may also write to the OQA C/O The Foundation Office, at Queenswood School, Brookmans Park, Hertfordshire, AL9 6NS. The Foundation office will refer any substantive issues to the OQA Chair (DPL).

The OQA will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

The OQA will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the OQA may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

- Requests that cannot be fulfilled

You should be aware that the right of access to data is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals or information which is subject to legal privilege (for example legal advice given to or sought by the OQA, or documents prepared in connection with a legal action).

We will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

- Consent

In general the OQA holds and processes its membership's data in the normal course of pursuing its legitimate interests, for example keeping the membership updated in regards to OQA activities. In this case, no consent is required. However on occasion the OQA will rely upon consent for example when emailing members directly regarding fundraising activity. Any person may withdraw this consent at any time. If you wish to withdraw consent please email qfoundation@queenswood.org.

Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates.

DATA ACCURACY AND SECURITY

The OQA will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the School's Foundation Office (email: qfoundation@queenswood.org), of any significant changes to important information, such as contact details, held about them. If submitting news for the Chronicle, then the relevant Section Secretary should be notified of such changes.

The OQA will take appropriate technical and organisational steps to ensure the security of personal data about individuals.

THIS POLICY

The OQA will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the OQA Data Protection Lead using the following contact details, triciawrinchoq@outlook.com.

If an individual believes that the OQA has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should notify the DPL. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the OQA before involving the regulator.

24th May 2018