

## **Alumni Privacy Notice 2025 - 2026**

This privacy notice describes how we collect and use personal information about you as an alumnus of the College, in accordance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.

### **The categories of information that we collect, process (use), hold and share include**

- Contact information such as name, address, email address, contact numbers;
- Records of your consents and contact preferences;
- Records of how you have engaged with our alumni network, including emails you have opened, events attended, mailing lists you have signed up to and other interactions;
- Information required to manage your attendance at alumni events, including access arrangements and dietary requirements which may include health conditions.

### **How is this collected?**

Most of the information above is collected directly from yourself when you register with us as an alumnus.

### **Why we collect and use this information**

We will use your personal information to keep in touch with you about events you may be interested in and other activities connected to being an alumnus of the College.

We may also use your personal information in the following situations:

- where we need to comply with a legal obligation;
- where we need to protect your interests (or someone else's interests);
- where it is needed in the public interest or for official purposes.

**We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose.**

### **The lawful basis on which we use this information**

#### **Consent**

Where you voluntarily provide us with your information, for instance, when you complete and submit an Alumni Registration form, or enquiry, to us, the lawful basis for that processing will be consent, as you made a conscious decision to provide us with that information.

Genuine consent is defined as “...any freely given, specific, informed and unambiguous indication of the Data Subject's [an individual's] agreement to the processing of personal data relating to him or her, such as by a written statement, including by electronic means, or an oral statement.”

For further details, please see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/consent/>

## Legitimate Interests

Where we have had previous contact with you, for instance, having submitted a form or made an enquiry to us previously, there may be things we would like to tell you about what the College has to offer, which we feel may be of interest to you.

UK data protection legislation allows us to contact you in these circumstances, where we consider it in our and your legitimate interests to do so and where we use any information previously provided in a manner consistent with how it was provided to us originally, provided also that there is a minimal privacy impact to you in us doing so.

Where we have an existing relationship with you, and we have offered you the opportunity to opt out, but you have declined to do so, it may not be necessary to obtain fresh consent each and every time we interact with you. This is because there is an exception to the consent rule, known as the ‘soft opt-in’, provided you are an “existing customer”. This is based on the legitimate interest of the College to maintain a relationship with individuals who expressed a clear interest in one of our products or services and the expectation that having indicated an interest in the College, this is information you would like to or expect to receive from us. If you are an existing customer, we may therefore send you information about our products and services similar to those for which you expressed an interest.

For further information on “legitimate interests” please go to <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/>

## How long we keep your information

Except as otherwise permitted or required by applicable law or regulation, the College only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

We will retain your data for as long as you remain a member of our alumni and up to a year afterwards (or longer if the law requires us to).

Marketing and Communications			
Activity	Type of Data	Retention Period	Reason for retention
Alumni Data	Alumni communications	Issue + 1 year	Consent and College's legitimate interests

<b>Alumni Data</b>	<b>Records containing personal data on individual alumni</b>	For as long as the individual remains an alumnus + 1 year	Consent and College's legitimate interests
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## Back Ups

The College adopts the grandfather father son backup method.

All College hosted systems are backed up nightly to multiple locations including offsite in accordance with the below schedule, following GFS principles:

Every 1 day for 30 days

Every 1 month on last day of the month for 12 months

Every 1 year on last day of the year starting in January for 6 years

However, the same retention periods referred to above will apply.

## Who we share this information with

We may need to share your data with third parties, including third party service providers where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Otherwise, we will not share you personal data with anyone else without your consent.

## Transferring your personal data outside of Europe

Unless otherwise stated, your information will remain at all times within the UK and or European Economic Area ("EEA").

If we have to transfer your personal data outside the EEA, we will only do so where:

- the recipient or recipient country ensures an adequate level of protection for your personal data;
- the recipient or recipient country is subject to an approved certification scheme or code of conduct with binding and enforceable commitments which amount to appropriate safeguards for your personal data;
- we have put in appropriate safeguards with the recipient or recipient country to protect your personal data such as a data sharing agreement;
- the transfer is permitted by law; or
- you expressly consent to that transfer.

## Requesting access to your personal data

Under data protection legislation, you have the right to request access to the information we hold about you.

To make a request for your personal information contact, contact the College's Data Protection Officer, Judith Clapham, either by contacting Judith at [judith.clapham@askham-bryan.ac.uk](mailto:judith.clapham@askham-bryan.ac.uk) or at [DataProtection@askham-bryan.ac.uk](mailto:DataProtection@askham-bryan.ac.uk)

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance by contacting Judith Clapham, either at [judith.clapham@askham-bryan.ac.uk](mailto:judith.clapham@askham-bryan.ac.uk) or at [DataProtection@askham-bryan.ac.uk](mailto:DataProtection@askham-bryan.ac.uk). Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## Complaints

If you are not satisfied with how the College has processed your personal data, or are not satisfied with how the College has responded to a request to exercise one or more of your data subject rights, as set out above, you have the right to make a complaint. In the first instance, this should be to the College; but you also then have the right to refer the complaint to the ICO if you are not satisfied with the College's response.

Please submit full details of your complaint to [enquiries@askham.bryan.ac.uk](mailto:enquiries@askham.bryan.ac.uk), as per the College's Complaints Policy which is available at <https://www.askham-bryan.ac.uk/publication-scheme-customer-services/> Please use the Stage 2 Compliant form which is also available at <https://www.askham-bryan.ac.uk/publication-scheme-customer-services/>

In accordance with the College's Complaints Policy, all complaints will be acknowledged within 2 working days, and the College will endeavour to provide a response within 10 working days. If more time is needed to investigate your complaint and provide a response, we will let you know. If you are not satisfied with the College's response to your complaint, you have the right to appeal, and ultimately, the right to complain to the ICO.

Please note: although you may complain to the ICO at any time, the ICO is likely to ask you to exhaust the College's complaints process first, before it processes your complaint. Please see the ICO's website [www.ico.org.uk](http://www.ico.org.uk) for further details.

## Further information

If you would like to discuss anything in this privacy notice, please contact Judith Clapham, either at [judith.clapham@askham-bryan.ac.uk](mailto:judith.clapham@askham-bryan.ac.uk) or at [DataProtection@askham-bryan.ac.uk](mailto:DataProtection@askham-bryan.ac.uk)

The College is registered with the Information Commissioner's Office ("ICO"). The Registration Number is Z6170811. Renewal of the registration takes place annually on 22 January.

Please also see the Data Protection Policy which is available at <https://www.askham-bryan.ac.uk/publication-scheme-data-protection/>

## **Last updated**

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated 10<sup>th</sup> June 2026.