



**The Romero
Catholic Academy**
Nurturing the Talent of Tomorrow



Privacy Notice Alumni

Responsible for policy:

Policy status:

Policy review:

Chair of Directors:

CC2 Strategy, People and Organisational Development

Compliance

Annually

Sharon Fawcett

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Definitions

In this **Alumni Privacy Notice**, unless the context otherwise requires, the following expressions shall have the following meanings:

- i **'The Romero Catholic Academy'** means the Company named at the beginning of this **Parents and Pupils Privacy Notice** and includes all sites upon which the Company is undertaking, from time to time, being carried out. The Romero Catholic Academy includes; **Corpus Christi, Good Shepherd, Sacred Heart, SS Peter and Paul, St Gregory, St John Fisher, St Patrick, Cardinal Wiseman, Shared Services Team.**
- ii **'Romero Catholic Academy'** means the Company responsible for the management of the Academy and, for all purposes, means the employer of staff at the Company.
- iii **'Board'** means the board of Directors of the Romero Catholic Academy.
- iv **'Chair'** means the Chair of the Board or the Chair of the Local Governing Body of the Academy appointed from time to time, as appropriate.
- v **'Governance Professional'** means the Governance Professional to the Board or the Governance Professional to the Local Governing Body of the Academy appointed from time to time, as appropriate.
- vi **'Chief Executive Officer or CEO'** means the person responsible for performance of all Academies and Staff within the Multi Academy Company and is accountable to the Board of Directors.
- vii **'Diocesan Schools Commission'** means the education service provided by the diocese, which may also be known, or referred to, as the Birmingham Diocesan Education Service.
- viii **'Local Governing Body'** means the Governing Body of the School.
- ix **'Governing Body Representatives'** means the governors appointed and elected to the Local Governing Body of the School, from time to time.
- x **'Principal'** means the substantive Principal, who is the person with overall responsibility for the day to day management of the school.
- xi **'School'** means the school or college within The Romero Catholic Academy and includes all sites upon which the school undertaking is, from time to time, being carried out.
- xii **'Shared Services Team'** means the staff who work in the central team across the Company (e.g. HR/ Finance)
- xiii **'Vice-Chair'** means the Vice-Chair of the Governing Body elected from time to time.
- xiv **'School DPO'** means the Data Protection Officer responsible for all schools within The Romero Catholic Academy (Warwickshire Legal Services)

1. Introduction

The Romero Catholic Academy is the **data controller** for the purposes of UK data protection law. This means we are responsible for how your personal information is collected, used and stored after you leave our schools.

The Romero Catholic Academy is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA137894.

You can contact The Romero Catholic Academy as the Data Controller in writing at:

Data protection Officer Romero Mac

C/O Cardinal Wiseman Catholic School

Potters Green Road

Coventry

CV2 2AJ

or admin@romeromac.com

2. What is a Privacy Notice?

A Privacy Notice explains how we collect, use, store and share your personal information, and your rights under UK data protection law.

3. What is Personal Information?

Personal information is any data that identifies you, directly or indirectly.

This may include information collected while you were a pupil or information you provide to us after leaving school.

4. What personal information do we process ?

We may hold and process the following information about alumni:

Personal data

- Name and contact details
- Dates of attendance
- School attended within the Trust

Historical school records

- Academic achievements and qualifications
- Awards and participation in school activities

Alumni engagement data

- Information you provide when joining alumni networks
- Communication preferences
- Event attendance records

Additional information

- Photographs (where appropriate)
- Career updates or achievements you choose to share

Sources of Personal Information

We obtain personal information from:

- Historical school records held by the Trust
- Information provided directly by alumni
- Publicly available information where alumni choose to share achievements or career updates
- Information provided through alumni events, surveys or communications

5. Why do we use personal information?

We use alumni data to:

- Maintain contact with former pupils
- Celebrate achievements and maintain school community links
- Organise alumni events and activities
- Share news, updates and opportunities
- Support school development (e.g. mentoring or fundraising initiatives)
- Respond to enquiries about past records

6. What are our legal bases for processing your data?

We only process personal data where the law allows us to.

Lawful bases under UK GDPR (Article 6)

We rely on:

- **Legitimate interests** – Our legitimate interests include maintaining engagement with former pupils, celebrating alumni achievements, promoting the educational community, organising alumni events, facilitating mentoring opportunities, and supporting the long-term development of the Trust.
- **Public task** – where processing relates to education records we are required to maintain
- **Consent** – for communications such as newsletters or marketing materials

Purpose	Data	Lawful basis
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Alumni communications	Contact details	Consent
Maintaining alumni network	Name, attendance history	Legitimate interests
Responding to record requests	Education records	Public task / Legal obligation
Events and engagement	Attendance data	Legitimate interests

7. Who do we share your information with?

We only share your information where necessary and lawful.

We may share information with:

- ICT and cloud service providers
- Email communication platforms
- Event management providers
- Professional advisers, auditors and insurers
- Regulatory bodies where required by law

We do **not** share your data for commercial purposes.

Important information:

- Some organisations act as **data processors** on our behalf
- Others may be **data controllers** in their own right

8. International data transfers

Some alumni communication systems (e.g. email platforms) may store data outside the UK.

Where this occurs, we ensure appropriate safeguards such as:

- UK adequacy regulations
- International Data Transfer Agreement (IDTA)
- Standard contractual clauses

You can request further details from the Data Protection Officer.

9. How long do we keep your information?

Alumni contact information will be reviewed periodically and retained while there is an active relationship with the Trust or until an individual requests removal. Records may also be deleted where contact details become inaccurate, or engagement ceases for an extended period.

Typically:

- Core alumni contact details are retained until you request removal
- Historical academic records are retained in line with statutory requirements

We follow the **Information and Records Management Society (IRMS) Schools Toolkit**.

10. Your rights

Under UK data protection law, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request erasure (in certain circumstances)
- Restrict processing
- Object to processing (particularly where based on legitimate interests)
- Data portability (where applicable)
- Withdraw consent at any time (for communications)

To exercise your rights, please contact the Data Protection Officer.

11. Marketing and communications

We will only send you alumni updates, newsletters or event information where:

- You have given **consent**, or
- We believe it is within our **legitimate interests** and you have not opted out

You can opt out at any time by:

- using the unsubscribe link in emails, or
- contacting us directly

12. Complaints

All complaints must follow our complaints procedure, if you have any questions regarding complaints please email admin@romeromac.com

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you believe your data protection rights have been breached.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline: 0303 123 1113

Website: <https://ico.org.uk>

13. Data Security

We take appropriate steps to protect your data, including:

- secure systems and restricted access
- staff training in data protection
- secure handling of records

14. Links with other policies

This Privacy Notice should be read alongside:

- Data Protection Policy
- Records Management Policy
- Information Security Policy

15. Monitoring and Review

Responsibility for implementing and monitoring this Privacy Notice rests with The Romero Catholic Academy Trust as Data Controller, supported by the Data Protection Officer.

The Board of Directors delegate the implementation of this privacy notice to the Governing Body.
This Privacy Notice is reviewed annually by CC2 Strategy, People and Organisational Development.