

## ACS Alumni Privacy Policy

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Please note:

All ACS schools will operate in compliance with the relevant legislation of the country in which they are operating. Where ACS International Schools is operating outside of the United Kingdom the UK regulatory framework will provide the foundation for best practice as far as this policy is concerned.

### *Document Status*

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Policy Approver: ACS Policy Committee

### *Change Control*

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Nominated Lead Member of Staff:	Head of Development and Alumni Relations – Amba Shirfield

## **1. Introduction**

- 1.1 The Alumni Privacy Policy is in addition to the Privacy Policy of ACS International Schools (henceforward referred to as ACS), which may be accessed at <http://www.acs-schools.com/Policies>. The Alumni Privacy Policy applies specifically to information held about Alumni and Friends of ACS.
- 1.2 For the purpose of this policy, alumnus (plural alumni) is used to refer to anyone who has been an enrolled student at any of ACS' schools.
- 1.3 For the purpose of this policy, Friends are former paid staff, former parents and existing parents at any ACS' schools.
- 1.4 For the purpose of this policy consent refers to a person freely giving permission to ACS to hold their data and use it to contact them about ACS events and plans that may be of interest or relevant to them. ACS aims to ensure that alumni and friends who are asked for their consent are fully informed about what they are consenting to, and that no ambiguity or confusion is associated with ACS' request for consent. Consent can be withdrawn at any time and ACS commits to ensuring that the process for withdrawing consent will be as simple and straightforward as giving it was in the first instance.

## **2. Purpose**

- 2.1 The role of the Development and Alumni Relations Office is to enable former ACS students and parents of ACS students to keep in touch with their school and with each other, as well as to provide opportunities for alumni and friends to support the organisation. In order for the Development and Alumni Relations Office to fulfil its role effectively it maintains records of alumni and friend information. This information is provided by alumni and friends themselves or drawn from sources such as online services (see 2.2).
- 2.2 ACS continuously reviews alumni and friends records to ensure data is as accurate as possible. ACS may use third-party partners in order to support this activity. Such sources may include Royal Mail address files, BT phone directories, employment updates made available by alumni via LinkedIn or other social media services, newspaper articles, company websites and other publicly available sources. Where social media services are consulted, ACS use of information contained therein will comply with the privacy policies and terms and conditions of those services as well as with ACS own Data Protection policy and Privacy Notice and the UK's Data Protection Act, 2018.

### 3. Use of Information

**Where alumni and/or friends have given their consent, their data is accessible to ACS schools and faculties, alumni volunteers, chapters, groups and networks, the ACS North American office, the parent-teacher organisations, sports and other clubs associated with the schools. This data is used and processed for a full range of alumni engagement and fundraising purposes.**

3.1 The information provided by alumni and friends is used by ACS for the following communications, which may be sent by mail, email, telephone and social media:

- Distribution of alumni newsletters, reports and surveys
- Notification of alumni events
- Promotion of alumni mentoring programmes
- Promotion of benefits and services for alumni and friends
- fundraising programmes
- Eliciting non-financial support (e.g. careers advice and mentoring to students and alumni, help with student recruitment).

3.2 ACS may use third-party partners to support the activities described above. If an alumnus interacts with ACS through a third party (for example, supporting the schools via JustGiving or a crowdfunding page) ACS may obtain information about such alumni from that third party, only if the alumnus/i has/have given explicit consent to that third party sharing their information. The receipt of data by the Development and Alumni Relations Office in this manner is subject to the third party's own privacy policy. A list of parties with whom ACS partners in this way is available on request from the Development and Alumni Relations. Data obtained in this way is treated no differently to any other data once it is held by the Development and Alumni Relations Office, and is covered by the terms of this privacy statement.

3.3 Tools may be used to help ACS improve the effectiveness of its communications with alumni and friends, including tracking whether e-mail messages sent are opened and which links are clicked within a message. ACS monitors website visits and uses tools such as Google Analytics to improve its website and services.

### 4. Wealth screening, data analysis and updating of contact details

4.1 ACS International Schools is a registered charity and a fundraising institution with a goal to widen access to teaching and facilities. As a charity, ACS may gather information about alumni and friends from publicly available sources, such as Companies House, the Electoral Register and the media – to facilitate understanding of alumni and friends and tailor services more effectively.

4.2 ACS may carry out wealth screening, a process which uses trusted third-party partners to automate some of this work. ACS may use information gathered from public sources or other departments or faculties across ACS alongside the information provided by alumni. This process enables ACS to undertake analysis of who might support the organization and to understand the preferences of alumni and friends about events, communications and services. By doing this, ACS can focus conversations with alumni and friends about volunteering and fundraising in the most effective way, and ensure that each alumnus/i, friend and potential donor is provided with an appropriately individualized experience.

## **5. Safe Storage and Publication of Alumnus Data**

- 5.1 ACS will store in good faith information about alumni that is believed to be factually correct, not excessive and relevant to the work of the ACS Development and Alumni Relations Office.
- 5.2 ACS endeavours to be respectful of its constituents with regard to information retained. ACS distinguishes between “personal information” such as gender and workplace, and “sensitive” information. Sensitive information is not relevant to the work of the ACS Development and Alumni Relations Office and will not be recorded even when published by alumni. Sensitive information is defined in the General Data Protection Regulations (GDPR) in Article 9 as “special categories of personal data”. It includes such data as racial/ethnic origin; political beliefs; religious/faith beliefs; Trade Union membership; physical/mental health condition; sexual orientation/activities; commission or alleged commission of an offence and any proceedings such as a court sentence.
- 5.3 ACS commits to protecting alumnus data privacy. ACS is mindful of its duties and responsibilities under the UK Data Protection Act 2018, and follows security procedures regarding the storage and disclosure of information in order to avoid unauthorised access or loss. ACS uses industry-standard security systems and procedures to protect information from unauthorised disclosure, misuse or destruction.
- 5.4 In common with all schools, ACS is subject to various access to information regimes, (for example, freedom of information requests), which may oblige it to disclose information to authorized bodies on request in order to comply with the law. ACS commits to the highest principles of data protection and will not routinely share alumnus data without the permission of the alumnus/i, other than details that alumni choose to share on the ACS Global Connect online profile.
- 5.5 ACS will not routinely disclose alumnus data to any external bodies, other than those contracted by the ACS Development and Alumni Relations Office in order to assist with its routine activities such as those listed in section 3.1.

## 6 Alumnus Access to Own Data

- 6.1 Alumni have the right to request a copy of the information that ACS holds about them.
- 6.2 Alumni can obtain a copy of personal information held about them by ACS by contacting the Head of Development and Alumni Relations at [alumni@acs-schools.com](mailto:alumni@acs-schools.com). The Development and Alumni Relations office staff will endeavour to respond to such requests within ten working days of receipt **during term time only**. If the request is received during holidays, it will be processed at the start of the new term within ten working days of receipt.

This commitment does not affect alumni's statutory rights of data access under the GDPR and the UK Data Protection Act, 2018. Subject access requests under that legislation may be made at any time by writing to the Data Protection Office at [dpo@acs-schools.com](mailto:dpo@acs-schools.com). No charge is made for this service.

## 7 Contact with Development and Alumnus Relations Office

- 7.1 ACS will normally maintain contact with alumni via telephone, e-mail and post.
- 7.2 Alumni who prefer not to receive some types of communication, or any communication, from the Development and Alumnus Relations Office can opt-out by e-mailing [alumni@acs-schools.com](mailto:alumni@acs-schools.com).

## 8 Links to Other ACS Policies

- 8.1 This policy links to ACS' Data Privacy Notice and to ACS' Data Protection Policy.
- 8.2 Further information regarding alumni data and ACS' compliance with data protection legislation is available from ACS. Requests for further information should be sent to:

Data Protection Officer,  
ACS International Schools Ltd.,  
West Lodge, Portsmouth Road,  
Cobham,  
Surrey KT11 1BL  
United Kingdom