



## **RUGBY SCHOOL GROUP ALUMNI PRIVACY NOTICE**

### **INTRODUCTION**

Rugby School, and the schools in the wider Rugby family, values the lifelong relationship with former pupils and takes its responsibilities in relation to personal data seriously. This Privacy Notice explains how Rugby School Group uses and protects personal information relating to alumni, why that information is held, and the rights that individuals have in respect of it.

This Notice applies to former students, staff and parents of Rugby School and other UK schools within the Rugby School Group, as well as to alumni of overseas schools that operate under the Rugby School name. It is intended to be read alongside any specific information provided when alumni register for events, communications or online services.

### **WHO WE ARE AND HOW TO CONTACT US**

For the purposes of UK data protection law, the data controller is the Governing Body of Rugby School, a registered charity. In the UK, the Governing Body of Rugby School operates Rugby School, Bilton Grange, Aysgarth School and Old Buckenham Hall School, together with relevant subsidiaries.

Additionally, schools overseas operate under licence to use the Rugby School name. These schools are independent legal entities, owned and operated separately, and are not part of the Rugby School charity. Where alumni of those schools choose to engage with the wider Rugby alumni community, their data may be processed in accordance with this Notice.

Unless stated otherwise, reference in this Notice to “Rugby School” should be taken to include all schools within the broader Rugby family.

Rugby School Group has appointed School Pro TLC as its Data Protection Officer in the UK. Queries relating to alumni data in the UK can be directed to [alumni@rugbyschool.net](mailto:alumni@rugbyschool.net), or to the Data Protection Officer at [DPO@schoolpro.uk](mailto:DPO@schoolpro.uk). Queries relating to usage overseas, should be directed to the relevant overseas school.

### **WHAT INFORMATION WE HOLD ABOUT ALUMNI**

The personal information we hold about alumni is typically limited to what is necessary to maintain appropriate contact and engagement. This will usually include names, dates of birth, years attended, contact details and records of engagement with alumni activities. Alumni may also choose to provide information about their education or career after leaving school.



From time to time, we may hold photographs or recordings taken at alumni events, and records of communication preferences or consent choices. We do not normally hold sensitive or special category personal data about alumni unless it is volunteered for a specific purpose, such as accessibility arrangements for an event.

### **HOW ALUMNI INFORMATION IS COLLECTED**

Much of the information we hold originates from school records created while an individual was a student. This may be supplemented over time by information provided directly by alumni, for example when registering for events, updating contact details or engaging with alumni platforms. We may also collect data on alumni from publicly available sources, such as the media.

In the case of overseas Rugby-branded schools, alumni data may be provided to Rugby School by the overseas school where an alumnus has chosen to join the wider Rugby alumni network and has been informed that their data will be transferred to the United Kingdom for this purpose.

### **WHY WE USE ALUMNI INFORMATION**

Rugby School uses alumni information primarily to maintain relationships with former pupils and to support a connected, engaged alumni community. This includes communicating news and updates, organising reunions and events, and facilitating alumni networks in the UK and overseas.

We also use alumni data to support the charitable aims of Rugby School, including fundraising and development activity, and to preserve the historical record of the School. In addition, we may process alumni information where necessary to comply with legal obligations, to respond to enquiries or complaints, or to obtain professional advice.

In most cases, this processing is carried out because it is in the legitimate interests of Rugby School and its alumni community. Where consent is required - particularly in relation to certain communications or international data sharing - this will be obtained clearly and recorded.

### **THE CENTRAL ALUMNI DATABASE AND TOUCANTECH**

Rugby School maintains a central alumni database hosted in the United Kingdom using a specialist alumni management platform provided by ToucanTech. ToucanTech acts as a data processor on behalf of Rugby School and processes personal data only in accordance with our instructions and contractual obligations.



This central database enables Rugby School to maintain accurate records and to support alumni engagement in a consistent and secure way.

### **ALUMNI OF OVERSEAS RUGBY-BRANDED SCHOOLS**

Alumni of overseas schools that operate under the Rugby School name may choose to become part of the wider Rugby alumni community. Where this happens, their personal data may be transferred to and stored in the UK on the central alumni database. This will always be explained at the point of collection and will only take place where there is a lawful basis to do so, typically the alumnus' explicit consent.

Authorised staff at overseas Rugby-branded schools may be given controlled access to relevant alumni records so that they can communicate with their alumni, organise events and maintain local alumni networks. Such access is limited to these purposes and is governed by formal data-sharing agreements which impose confidentiality, security and usage restrictions.

Because some overseas schools are located in countries which do not have data-protection laws equivalent to those in the UK, Rugby School takes additional steps to protect alumni data. These include reliance on explicit consent where appropriate and the use of contractual safeguards to ensure that personal data is handled responsibly.

### **WHO WE SHARE ALUMNI INFORMATION WITH**

Alumni information may be shared with alumni organisations associated with the school with which the alumnus is associated – for example, The Bilton Grange Society for alumni of Bilton Grange or The Rugbeian Community of Japan for alumni of Rugby School Japan.

Additionally, information may be shared with the Hong Kong Friends or the Rugbeian Society of North America for alumni who live in those regions.

Data will not be shared between the separate alumni organisations of the different schools within the Group.

All such sharing is carried out on a controlled basis and in accordance with data-protection law. Rugby School does not sell alumni data.

### **HOW LONG WE KEEP ALUMNI INFORMATION**

Rugby School retains alumni information for as long as it is reasonably necessary to maintain alumni relations, support the School's charitable and historical purposes, and meet legal or regulatory obligations. Where an alumnus asks to stop receiving communications, we will retain a limited record of that preference to ensure it is respected.



## **DATA SECURITY**

Appropriate technical and organisational measures are in place to protect alumni personal data against loss, misuse or unauthorised access. These include secure hosting, access controls, staff training and contractual protections with third-party providers.

## **YOUR RIGHTS**

Alumni have a number of rights under data-protection law. These include the right to access personal data held about them, to request correction of inaccurate information, to object to certain types of processing, to withdraw consent where it has been given, and in some circumstances to request erasure or transfer of data.

Requests or enquiries about these rights can be made by contacting [alumni@rugbyschool.net](mailto:alumni@rugbyschool.net) or [infosecurity@rugbyschool.net](mailto:infosecurity@rugbyschool.net).

## **CHANGES TO THIS NOTICE AND COMPLAINTS**

This Privacy Notice may be updated from time to time to reflect changes in law or in how alumni data is used. Where changes are significant, they will be communicated where appropriate.

If you have concerns about how your personal data is handled, we encourage you to contact Rugby School in the first instance. You also have the right to raise a complaint with the Information Commissioner's Office at: <https://ico.org.uk/concerns/>, although the ICO recommends that steps are taken to resolve the matter with the Data Controller before involving the regulator (ICO).