

PRIVACY STATEMENT FOR ALUMNI

1. Who are we?

- **The British School of Brussels (BSB) as data controller**

Through this statement (hereinafter referred to as the “**Statement**”), we wish to inform you how your personal data is used for alumni relations purposes by BSB, with registered office located at Pater Dupierreuxlaan 1, 3080 Tervuren, and registered under company number 0408.705.045 (hereinafter referred to as “**we**”, “**us**” or “**BSB**”).

We are responsible for the processing of the personal data that we collect and use. As data controller, we take the necessary steps in order for you to:

- be informed of the processing of your personal data and your rights;
- retain control over the personal data that we process;
- be able to exercise your rights with regard to personal data.

The Data privacy team

BSB has appointed a data privacy team. The team’s task is to inform all concerned parties about the personal data processed. The team monitors and advises on compliance with the rules and regulations related to the processing and protection of personal data, including the European General Data Protection Regulation (GDPR).

You may contact the data privacy team on any matters relating to the processing of your personal data and the exercise of your rights.

2. What data do we hold about you?

By “personal data” we mean all information relating to a specific living natural person. We may hold personal data relating to you from a number of sources.

The main source is the information which you provide to us and the information which is transferred from your student record to our alumni database. The data we hold, contains details of your education (e.g. courses you have completed and dates of study), contact details, personal identifiers and biographical information, details about your family, details of your interactions with the school, information about your areas of interest and achievements. We also process images of you, such as pictures taken on alumni events.

We do not intentionally collect and do not process data referred to as sensitive, such as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health-related data, or data about sexual orientation. If such sensitive data are provided to us, we will not use them and will delete them.

3. For what purposes do we need your data?

We will use your details to manage your interaction with BSB and to contact you to:

- keep you informed of BSB news, and the achievements and advances being made by the BSB, its students and staff and our alumni;
- tell you about the benefits of being an alumni of BSB;

- invite you to events hosted by BSB, partner organisations or your fellow alumni (for example reunions, career roundtables);
- offer opportunities for you to engage with BSB as an ambassador, volunteer, friend and supporter.

Communications to you may be sent by post, by phone or electronic means, depending on the contact details we hold, on the consent that you have provided, and on the preferences expressed by you about the types of communications you wish to receive.

These processing activities are based on your consent, the necessity for the performance of a contract (e.g. the participation at an event) or our legitimate interest.

4. Which other people do we share your data with?

- The employees of BSB who must have access to personal data to carry out their professional duties can access such data. These people act under our supervision and responsibility.
- We also call on external suppliers who handle certain types of processing, such as providers of IT-solutions and e-mail marketing tools. Given that these third parties have access to personal data in the context of the performance of the requested services, we have taken technical, organisational and contractual steps in order to ensure that your data are only processed and used for the purposes mentioned in this Statement.
- When we have a legal obligation to do so, we will share the data with the entities and/or authorities that are legally entitled to receive the data.
- You can find us on online platforms operated by third parties such as Facebook, Graduway and LinkedIn. In using these platforms, your data will be processed by such third parties under their terms and conditions. We therefore encourage you to read the privacy statements related to these online platforms.

5. Where do we store and process your personal data?

Personal data will not be transferred outside the EU, except where this is required in the framework of our activities or events (e.g. an alumni event in South Africa). If we plan to store and/or process them outside the EU, we will ensure that the same level of protection is guaranteed.

If we use subcontractors, the data can be forwarded to countries where the data centres of these subcontractors are located. Therefore, it is possible that certain personal data will be transported outside the EU.

In such a case, and where required, we will enter into an agreement with these subcontractors based on a model approved by the European Commission and by which these subcontractors guarantee the same level of protection as that guaranteed by BSB for data stored within the EU.

Should you want a copy of the agreement, please contact us as explained in point 8..2. of this Statement.

6. How long do we retain your personal data?

We will not keep your data for longer than the time required to achieve the objectives in this Statement. Given that the need to retain data depends on the kind of data and the purpose of the processing, retention periods may vary considerably.

Below you will find the criteria we use as a basis to define the length of retention periods:

- how long do we need the data to be able to provide our service?
- is it possible to define a specific retention period?
- are we subject to a legal or contractual obligation, or a comparable obligation?

As soon as we no longer need your data and are no longer legally obliged to retain them, we will permanently delete them or, if this is not possible, anonymise them in our systems.

7. How do we secure your personal data?

Your personal data are considered strictly personal. We take appropriate technical and organisational steps to protect the personal data provided and collected from any accidental destruction, loss or alteration, as well as from any damage or accidental or unlawful access, or other unwarranted data processing.

8. What are your rights?

8.1. Your rights

- Right of access: you have access to the personal data that we process and have a right to view them. If you wish, we will provide you with a copy of these data free of charge.
- Right of rectification: you have the right to request the deletion or rectification of erroneous, fragmented, inadequate or obsolete data.
- Right to withdraw your consent: when the processing is based on your consent, you have the right to withdraw such consent at any time.
- Right to object to direct marketing: you have the right to object to the processing of your data for direct marketing purposes if you do not (any longer) wish to receive such communication from us. Your request will be processed as quickly as possible and we will no longer process your data for direct marketing purposes.

We draw your attention to the fact that exercising your right to object does not prevent us from contacting you for any other purpose, including the performance of the contract, in accordance with this Statement.

- Right to object to certain types of processing: when your personal data are processed for legitimate reasons, you have the right to object to the processing of your data for reasons relating to your specific situation.

- Right to be forgotten: you have the right to obtain the erasure of your personal data. If you wish to terminate the relationship with BSB, you may therefore ask us to stop using your personal data. We may, nevertheless, retain the data required for evidentiary purposes. However, data protection legislation limits this right, which cannot be exercised under all circumstances.
- Right to data portability: you may ask us to transfer to a third party or to you the personal data that you provided to us. However, data protection legislation limits this right, which does not apply to all data.

8..2. How can you exercise your rights?

To exercise the above-mentioned rights, you may send us a written request:

- By email: data-privacy@britishschool.be, or
- By post to the following address:
Data privacy
British School of Brussels
Pater Dupierreuxlaan 1
3080 Tervuren

We ask you to clearly indicate the right you wish to invoke and to which processing you wish to object or which consent you wish to withdraw.

9. How to ask questions or lodge a complaint?

If you have any questions or wish to lodge a complaint concerning the processing of your data, you may contact us via the following channels:

- By email: data-privacy@britishschool.be, or
- By post to the following address:
Data privacy
British School of Brussels
Pater Dupierreuxlaan 1
3080 Tervuren

If you are not satisfied with our response, if you have any comments regarding the exercising of your rights or if you believe that our processing of your personal data does not comply with legislation, you have the right to lodge a complaint with the Data Protection Authority. You will find all the information on this subject at <https://www.autoriteprotectiondonnees.be/>.

10. Modification of this Statement

We reserve the right to modify or supplement this Statement if necessary. In case of significant changes, we will inform you accordingly.