



Members and Alumni Privacy Notice

This privacy notice applies to members, graduate members and alumni.

A Summary of What This Notice Explains

Matrix College is committed to protecting the privacy and security of personal data.

This notice explains what personal data Matrix College holds about alumni and College graduate members, how we use it internally, how we share it, how long we keep it and what your legal rights are in relation to it.

For the parts of your personal data that you supply to us, this notice also explains the basis on which you are required or requested to provide the information. For the parts of your personal data that we generate about you, or that we receive from others, it explains the source of the data.

There are some instances where we process your personal data on the basis of your consent. This notice sets out the categories and purposes of data where your consent is needed.

Matrix College has also published separate notices, which are applicable to other groups and activities. Those notices may also apply to you, depending on your circumstances, and it is important that you read this privacy notice together with other applicable privacy notices, available at www.matrix.ac.uk/compliance.

What Is Your Personal Data and How Does the Law Regulate Our Use of It?

“Personal data” is information relating to you as a living, identifiable individual. We refer to this as “your data”.

“Processing” your data includes various operations that may be carried out on your data, including collecting, recording, organising, using, disclosing, storing and deleting it.

Data protection law requires us, as data controller for your data:

- To process your data in a lawful, fair and transparent way;
- To only collect your data for valid purposes that we have told you about;
- To only collect data that is relevant, and limited to the purpose(s) we have told you about;
- To ensure that your data is accurate and up to date;
- To ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- To ensure that appropriate security measures are used to protect your data.

What Personal Data We Hold About You and How We Use It

We may hold and use a range of data about you at different stages of our relationship with you. We might receive this data from you; we might create it ourselves, or we might receive it from someone else (for example, if someone provides us with a reference about you).

Categories of data that we collect, store and use include (but are not limited to):

Alumni:

- The contact details that you provide to us as a student and thereafter, including names, addresses and telephone numbers.
- Date of Birth and gender.
- Your course details and attendance records.
- Any information you provide (or provided as a student) to access specialist support/services at the College.
- Qualifications and details of your former school(s) and/or universities.
- Professional and employment/engagement details, including current and past professional titles and contact details.
- Communications relating to decisions we make.
- Visual images/photographs (including CCTV), which may come from publicly available sources where copyright allows.
- Records of your interactions with us (correspondence, notes) including your communication preferences.
- Details of any relevant criminal convictions or charges that we ask you to declare to us, either when you apply to us, or during your membership of the College.
- Details of any medical issues and/or disabilities that you have notified to us, including any consideration and decision on reasonable adjustments made as a result.

Additionally for **Matrix members**:

- Information you provide on your annual registration forms.
- Details of your client numbers, supervision details, including hours, CPD experiences and any further training.
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The consequences for any failure to provide such data will depend on the particular circumstances. For example, in the case of Matrix members a failure to provide information requested for annual re-registration will mean we are unable to support your continuing registration with UKCP. In the case of alumni more generally, we may be unable to keep in touch with you to inform you of the College's activities which may be of interest to you.

Some data that you give to us is provided on a wholly voluntary basis – you have a choice whether to do so. For example, we may invite you to provide us with disability and health condition information, which you may choose to provide to us in order that we can take this information into account when considering whether to make a reasonable adjustment.

Other Sources of Your Data

Apart from the data that you provide to us, we may also process data about you from a range of sources. These include:

- Data held on our student records system, which will be transferred to our Members and Alumni records system on your graduation,
- Data that we generate about you, such as when processing your annual registration forms, inviting you to events or arranging payments,

- Your previous educational establishments and/or employers if they provide references to us;
- The UKCP to process registrations;
- Fellow members of Matrix College, family members, friends, and other contacts who may provide us with information about you if and when they contact us, or vice versa.

The Lawful Basis on Which We Process Your Data

The law requires that we provide you with information about the lawful basis on which we process your personal data, and for what purposes.

Most commonly, we will process your data on the following lawful grounds:

- Where it is necessary to perform the contract we have entered into with you;
- Where it is necessary to provide an academic reference;
- Where it is necessary for the performance of a task in the public interest;
- Where it is necessary to comply with a legal or professional obligation;
- Where it is necessary for our legitimate interests (or those of a third party including Middlesex University, as validating institution of the College's programmes) and your interests and fundamental rights do not override those legitimate interests.

We may also use your data, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests. In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent.

How we apply further protection in the case of "Special Categories" of personal data

"Special categories" of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.

The special categories of personal data consist of data revealing:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;

They also consist of the processing of:

- genetic data;
- biometric data for the purpose of uniquely identifying someone;
- data concerning health;
- sexual orientation.

We may process special categories of personal data in the following circumstances:

- Where processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on Matrix College or you in connection with employment, social security or social protection; or
- With your explicit written consent; or
- Where it is necessary in the substantial public interest, in particular:
 - for the exercise of a function conferred on Matrix College or anyone else by an enactment or rule of law; or
 - is necessary for the purposes of the prevention or detection of an unlawful act, must be carried out without the consent of the data subject so as not to prejudice those purposes; or
 - for equal opportunities monitoring;

- Where the processing is necessary for archiving purposes in the public interest, or for scientific or historical research purposes, or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law.

We have in place an appropriate policy document and other safeguards which we are required by law to maintain when processing such data.

Less commonly, we may process this type of data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the data public.

Criminal convictions and allegations of criminal activity

Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. We may process such data on the same grounds as those identified for “special categories” referred to above.

Details of Our Processing

The information below confirms how we may process information about you as alumni or a graduate member of the College:

- To perform our contract with you.
- To keep in touch and offer you services which may be of interest.
- To comply with our statutory obligations and legal responsibilities.
- To comply with wider regulatory requirements.
- To compile statistics and research to further the College’s business.

How We Share Your Data

Within the College, your data is shared only with those College staff who need to access it. We will not sell your data to third parties. We will only share it with third parties if we are allowed or required to do so by law. This includes for example:

- where we are required to report information to in order to report information to the Higher Education Statistics Agency or its successor body in order to comply with regulatory obligations;
- where we decide to report alleged criminal misconduct to the police
- HMRC, some information may be released to HM Revenue and Customs in order to collect Income Tax and National Insurance Contributions from employees

Examples of bodies to whom we may voluntarily disclose data, in appropriate circumstances, include but are not limited to:

- Agencies with responsibilities for the prevention and detection of crime, apprehension and prosecution of offenders, or collection of a tax or duty, for the prevention, detection or investigation of crime, for the location and/or apprehension of offenders, for the protection of the public, and/or to support the national interest.
- Mortgage lender and letting agencies, in order to allow these organisations to verify for mortgages and tenancy agreements. Release of this information is subject to a written request being received from the employee.
- Higher Education Statistics Agency (HESA), Some information, usually in pseudonymised form, will be sent to the HESA for statistical analysis and to allow government agencies to carry out their statutory functions.
- UKCP, to allow for and ensure re-registration of Matrix members
- Middlesex University, for monitoring purposes

It also includes disclosures where the third party is an agent or service provider appointed by the College to enable us to operate efficiently, provided we are satisfied appropriate safeguards have been put in place to ensure adequate levels of security for your data. All our third party service providers are required to take appropriate security measures to protect your personal information in line with their legal requirements, and are only permitted to process your personal data for specific purposes in accordance with our instructions. We do not allow our third party providers to use your personal data for their own purposes.

Automated Decision-making

We do not envisage that any decisions will be taken about you based solely on automated means, however we will notify you in writing if this position changes.

Sharing Your Data Outside the UK

The law provides various further safeguards where data is transferred outside of the UK. In some cases, we may need to disclose or transfer your personal information to third parties in areas outside the UK.

We may transfer your data outside the UK, but only for the purposes referred to in this notice and provided either:

- The level of protection of personal data in the recipient country is adequate; or
- Appropriate safeguards are in place to ensure that your data is treated in accordance with UK data protection law, for example through the use of standard contractual clauses; or
- There is an applicable derogation in law which permits the transfer in the absence of an adequacy decision or an appropriate safeguard.

Where you are resident outside of the UK in a country where there is no "adequacy decision" and an alternative safeguard is not available, we may still transfer data to you which is necessary for performance of your contract with us, or to take pre-contractual measures at your request.

How Long We Keep Your Data

The College retains student data for 10 years after the start of the academic year in which you are admitted to the College; see [Student Privacy Notice](#). Beyond that, personal data processed under this Privacy Notice relating to alumni and College graduate members will be retained for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements.

Retention periods may increase as a result of legislative changes, e.g. an increase in limitation periods for legal claims would mean that Matrix College is required to retain certain categories of personal data for longer. Any such changes will be reflected in updated versions of our privacy notice

If there are legal proceedings, a regulatory, disciplinary or criminal investigation, suspected criminal activity, or relevant requests under data protection or freedom of information legislation, it may be necessary for us to suspend the deletion of data until the proceedings, investigation or request have been fully disposed of.

Please note that we may keep anonymised statistical data indefinitely, but you cannot be identified from such data.

Your Legal Rights Over Your Data

- Subject to certain conditions set out in UK data protection law, you have:

- The **right to request access** to a copy of your data, as well as to be informed of various information about how your data is being used;
- The **right to have any inaccuracies in your data corrected**, which may include the right to have any incomplete data completed;
- The **right to have your personal data erased** in certain circumstances;
- The **right to have the processing of your data suspended** in certain circumstances, for example if you want us to establish the accuracy of the data we are processing.
- The right to receive a **copy of data you have provided to us**, and have that transmitted to another data controller (for example, another University or College).
- The **right to object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- The **right to object to the processing of your information** if we are relying on a “legitimate interest” for the processing or where the processing is necessary for the performance of a task carried out in the public interest.
- The **right to object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.
- Where the lawful basis for processing your data is **consent**, you have the **right to withdraw your consent at any time**. When you tell us you wish to exercise your right, we will stop further processing of such data. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent. You may withdraw your consent by contacting the College’s Administrator.

Some rights are not automatic. Further guidance on your rights is available from the Information Commissioner’s Office (<https://ico.org.uk/>). You may also wish to contact the College’s Administrator (see contact details above) if you are considering how or whether to exercise your rights.

If you wish to exercise any of your rights in relation to your data as processed by Matrix College please contact our Data Protection Officer as above. Some of your rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

You have the right to complain to the UK’s supervisory office for data protection, the Information Commissioner’s Office if you believe that your data has been processed unlawfully.

Future Changes to This Privacy Notice, and Previous Versions

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes, if Middlesex University makes changes to its procedures, or to make Matrix College’s operations and procedures more efficient. We will notify members of the change via the College’s VLE (Virtual Learning Environment), Moodle and alumni by email.

Matrix College’s Contact Details

If you need to contact us about your data, please contact:

The Administrator
Matrix College
6 Griffin Court
Wymondham
Norfolk
NR18 0GU
nikkita@matrix.ac.uk

Developed by: Operation Team June 2020
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