# **BCOM PRIVACY NOTICE (Alumni)**

## Scope

This document refers to personal data, which is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The General Data Protection Regulation (GDPR), which is EU wide and far more extensive than its predecessor the Data Protection Act, along with the Privacy and Electronic Communications Regulations (PECR), seek to protect and enhance the rights of EU data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU and its storage within the EEA.

**1 –** The British College of Osteopathic Medicine (trading as 'BCNO Ltd'), based at Lief House, 3 Sumpter Close, London NW3 5HR, which hereafter for the purposes of this Privacy Notice will be referred to as 'BCOM' or 'the College', is pleased to provide the following information:

#### 2 - Who we are

BCOM is a higher education institution, which also provides outpatient osteopathic care and undertakes research.

### 3 - Personal Data

For the purposes of contacting our Alumni, the College may collect and process personal data. This may be data collected directly from you, or from the Registry department. The Marketing Department will keep a record of your name, year of graduation and email address, which will be used to send relevant email marketing communications and newsletters on job vacancies, CPD and Alumni events and general college news.

Your personal information is created, stored and transmitted securely in a variety of electronic formats. Access to your personal information is limited to College staff who have a legitimate interest in it for the purpose of carrying out their contractual duties, and our use of your personal information will not be excessive.

## 4 - Legal basis for processing any personal data

The College will process your personal information held on the Alumni database only with your explicit consent.

If we require your consent for any specific use of your personal information, we will collect it at the appropriate time and you can withdraw this at any time. We will not use your personal information to carry out any wholly automated decision-making that affects you.

#### 5 - Disclosure

As described above, your personal information is shared with relevant staff at the College, as required.

## 6 - Retention Policy

If your join the Alumni database, your information will be kept indefinitely, unless you ask us to remove it.

## 7 - Data storage

All data is held in the United Kingdom.

### 8 - Your rights as a data subject

At any point whilst BCOM is in possession of, or processing your personal data, all data subjects have the following rights:

- Right of access –you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate or incomplete.

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- Right to be forgotten under certain circumstances, you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply you have a right to restrict the processing.
- Right of portability under certain circumstances, you have the right to have the data we hold about you transferred to another organisation.
- Right to object under certain circumstances, you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right not to be subject to the legal effects of automated processing or profiling.

In the event that BCOM refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge. At your request BCOM can confirm what information it holds about you and how it is processed.

## 11 - You can request the following information:

- Identity and the contact details of the person or organisation (BCOM) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of BCOM and information about these
  interests
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- How long the data will be stored.
- Details of your rights to correct, erasure, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority (ICO).
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful
  information about the logic involved, as well as the significance and expected consequences of
  such processing.

### 12 - To access what personal data is held, identification will be required

BCOM will accept the following forms of identification (ID) when information on your personal data is requested: a copy of your driving licence, passport, birth certificate and a utility bill not older than three months. A minimum of one piece of photographic ID listed above and a supporting document is required. If Osteopaths is dissatisfied with the quality, further information may be sought before personal data can be released. All requests should be made to <a href="mailto:dpo@bcom.ac.uk">dpo@bcom.ac.uk</a> or by phoning +44 (0) 207 435 6464 or writing to us at the address further below.

# 13 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Osteopaths you have the right to complain to us. If you do not get a response within 30 days, you can complain to the ICO. The details for each of these contacts are:

Data Protection Officer Telephone 0207 435 6464 or email: dpo@bcom.ac.uk

#### ICO

Wycliffe House, Water Lane, Wilmslow, SK9 5AF Telephone +44 (0) 303 123 1113 or email: <a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a>