

IOH CONNECT Privacy Statement

IOH CONNECT (IOHC) is an unincorporated members association formed to enable International Old Harrovians (i.e. Old Harrovians of Harrow International Schools) (IOHs), wherever they are in the world, to maintain lifelong connections with the School and with each other. In order to achieve this, the IOHC needs to store and process personal information in a number of ways whilst always respecting the laws governing data protection.

However International Old Harrovians and members choose to stay in touch with us, we will always respect your rights and choices. Here, we explain what we will, and will not do, with your personal data.

THE INFORMATION WE COLLECT AND HOW WE COLLECT IT

The IOHC collects specific information about its members in order to provide a more bespoke service to keep you informed about news and events that may be of interest to you. The information we collect can be categorised as follows:

- Personal details including name, titles, date of birth, gender, relationship status and name of spouse
- Preferred contact details such as postal address, email, and phone numbers
- Family relationships including any International Old Harrovian relations
- Educational information; prep school and university attendance but not including academic results
- Harrow International School achievements; sports teams and positions of responsibility
- Business details
- Membership of any IOHC clubs & societies
- Membership to any private club or association
- Engagement with the IOHC and Harrow International School; event attendance; work experience placements, careers talks
- Dietary requirements for events
- General hobbies and interests to help us put you in touch with like-minded IOHs

The IOHC starts collecting some of this information as soon as you are enrolled into the School as a student as a record of your attendance at the School. We then collect further contact information from you during your final term before leaving to become an International Old Harrovian. We continue to collect personal data from you when registering for events, volunteering, engaging with our social media channels or otherwise provide us with your personal information.

We may also try to connect with you through social media platforms such as LinkedIn, Facebook and/or WeChat to help us stay in touch and to keep our database up to date. This helps us to capture and collect business details to allow us to send invitations that may be of interest to you.

HOW WE STORE YOUR DATA AND KEEP IT SAFE

All the data that we collect from our members is stored on our database system *Microsoft SQL*, which is supplied by the software company *INET*. Our database is a cloud-based system located on servers held in Thailand. The software is upgraded regularly and we keep a close relationship with *INET* to ensure your information is kept secure.

Our alumni platform, IOHC is also a cloud-based database, supplied by software company *Impleplus*. Information is stored on servers located in Thailand and we again work with them to ensure that they do everything possible to keep your data safe.

HOW WE USE YOUR PERSONAL INFORMATION

In order to provide you with a high level of service, we will use your data in a number of ways. We have identified these activities as an integral part of your membership with the IOHC and as an International Old Harrovian. Unless you tell us otherwise, we will do the following:

- Maintain a record of your attendance at Harrow International School
- Send you the annual magazines
- Periodically send you communications that are of interest to maintain your connection with Harrow International School
- Send you invitations to events relevant to your time at Harrow International School and to your specific interests
- Track your engagement with the IOHC so we can provide you with a better service
- To use anonymised personal data to benchmark our activities

Consent – *With your permission, we will do the following:*

- Send you email invitations to events and other marketing material relating to IOHC activities
- Record dietary requirements for events
- Pass your information onto IOHC clubs and societies you have requested to join
- Periodically call you to update our records or to pass on information we feel is relevant to you

RETENTION OF YOUR PERSONAL INFORMATION

IOHC membership is life-long and so we consider our relationship with our members to be the same. We must however take into consideration our legal obligations when determining how long we retain your information and will endeavour to review our data regularly to ensure we are not keeping information for longer than required. We will ensure you are always able to update your information with us and are able to change your preferred communication preferences.

SHARING YOUR PERSONAL DATA

The IOHC is committed to protecting the privacy of Old International Harrovians and its members. Note that spouses, parents and friends have no automatic right of access to your personal data. The general principle is that your personal data will normally only be disclosed outside the IOHC with your consent.

However, there are occasions while you are at the School and after you leave when the IOHC is obliged by law, or under other obligations, to disclose the personal data to external people or agencies. These are sometimes called third party disclosures. The IOHC has internal procedures to check that the disclosure is appropriate and that the third party is legitimate before any release takes place. Third parties which the IOHC identifies are as follows:

- **Harrow International School:** Once you leave the School, the IOHC becomes the main database of those who have attended the School. On occasion, we may be required to share your data with the School such as your name, date of birth and time at the School. We may also need to share your contact data with the School so that they may send you transcripts, certificates, references, periodicals and occasional invitations.
- **Legal Authorities and Law Enforcement:** Where disclosure is necessary for the prevention or detection of crime, the IOHC will release your information where necessary to these authorities.
- **Service providers:** The IOHC may use services such as mailing houses under contract for relevant operations.
- **Employment references/confirmation of qualifications:** The IOHC receives numerous requests from employment companies and private clubs to confirm attendance at the School for applicants. When approached, the IOHC will first seek your explicit consent before releasing any data. We are only able to provide confirmation of your time at the School. We will therefore refer the request to the School when qualifications are also required.

YOUR RIGHTS

It is important to us that you know your rights and that you may:

- request a copy of the information we hold about you
- update or amend the information we hold about you if it is incorrect
- change your communication preferences at any time
- ask us to remove your personal information from our records
- object to the processing of your information for marketing purposes
- raise a concern or complaint about the way in which your information is being used

You have the right to access the information that the IOHC holds on you. This is called a Subject Access Request (SAR) and you will be requested to provide proof of identity.

IOH CONNECT 隐私声明

IOH CONNECT (IOHC) 是一个非法人团体组织，成立目的旨在让哈罗国际校友（即哈罗国际学校毕业的校友）（IOH）无论身处何方，也可与哈罗、校友彼此之间保持终生联系。为实现此目标，IOHC 需要以多种方式储存及处理个人信息，但会时刻尊重信息保护的法律。

无论哈罗国际校友和会员选择采用哪种方式与我们保持联系，我们将时刻尊重阁下的权利和选择。接下来我们会阐释将阁下个人信息用于哪些用途。

我们收集的信息种类和收集方式

IOHC 收集会员的具体信息，以提供更定制化的服务，让阁下知悉可能感兴趣的消息和活动。我们收集的信息可分类如下：

- 个人详情，包括姓名、职衔、出生日期、性别、婚姻状况和配偶姓名
- 首选联系详情：邮寄地址、电邮地址、电话号码
- 家族关系，包括与任何哈罗国际校友的关系
- 学习信息；中学和大学出席率，但不包括学术成绩
- 在哈罗国际学校的成就；曾经参与的运动团队和担任过的责任岗位
- 业务详情
- IOHC 旗下任何俱乐部和社团的会员身份
- 任何私人俱乐部或组织的会员身份
- 关于 IOHC 和哈罗国际学校的参与记录；活动出席率；实习岗位、职业讲座
- 就安排活动的饮食要求
- 一般嗜好和兴趣，从而促进阁下与志趣相投的 IOH 互相联系

当阁下报读哈罗国际学校时，IOHC 即开始收集阁下的部分上述信息，作为阁下在哈罗国际学校出席率之记录。我们继而于阁下最后一个学期内、离校成为哈罗国际校友前收集阁下的其他联系信息。当阁下报名参加活动、自愿工作、加入我们的社交媒体平台或以其他方式向我们提供阁下的个人信息，我们会继续收集阁下的个人信息。

我们也可能会通过领英，脸书和/或微信等社交平台与阁下保持联系，并更新我们的数据库。此举有助我们获得并收集业务详情，从而将阁下可能会感兴趣的邀请发送予阁下。

我们如何储存阁下的资料及妥善保管

我们从会员处收集的所有信息将储存于我们的数据库系统 *Microsoft SQL*，该系统由软件公司 *INET* 供应。我们的信息库是泰国境内服务器的云系统。软件定期进行升级，我们与 *INET* 保持紧密的合作关系，确保阁下信息获妥善保存。

我们的校友平台 IOHC 也是云端数据库，由软件公司 *Impleplus* 供应。信息储存于泰国境内的服务器，我们也与他们保持合作，确保他们采取所有可使阁下信息获妥善保存的可能步骤。

我们如何使用阁下的个人信息

为了向阁下提供高水平的服务，我们会以多种方式使用阁下的数据。我们认为这些活动将会是阁下作为哈罗国际校友在 IOHC 的会员的组成部分。除非阁下另有指示，否则我们将：

- 保留阁下在哈罗国际学校的出席记录
- 向阁下发送年刊
- 定期发送阁下感兴趣的资讯，以保持阁下与哈罗国际学校的联系
- 向阁下发送与阁下在哈罗国际学校就读期间相关以及阁下特定兴趣相关的活动邀请
- 追踪阁下与 IOHC 的交流情况，让我们可提供更好服务
- 使用不具名的个人资料，为我们活动进行对标

同意 – 在阁下批准下，我们会：

- 向阁下发送与 IOHC 活动有关的活动和其他宣传材料的电邮邀请
- 记录阁下对参与活动时的饮食要求
- 将阁下的信息转交 IOHC 俱乐部和阁下曾申请参与的组织
- 定期致电阁下更新记录或传递我们认为与阁下相关的信息

保存阁下的个人信息

IOHC 会籍是终生制的，所以我们认为大家的关系是始终如一。然而，当决定要将阁下的信息保存多久时，我们必须考虑自己的法律责任，并将努力定期予以更新我们的数据，确保我们保存资料的时间不会过于需要的。我们将确保阁下可时刻更新储存于我们的信息，并可变更阁下的通讯偏好。

分享阁下的个人信息

IOHC 致力保护哈罗国际校友及其会员的隐私。请注意，阁下的配偶、父母和朋友都不享有自动查阅阁下个人信息权利。总原则是阁下的个人信息一般只会在阁下同意下才向 IOHC 外部人士披露。

然而，在阁下求学期间及离校后，IOHC 依法有责任或负有其他义务向外部人士或部门披露个人信息。此为第三方披露。在任何信息发放前，IOHC 设有内部程序检查有关披露是合适的，且该第三方是否真实合法。以下各机构为前述第三方：

- **哈罗国际学校：**当阁下离开哈罗国际学校时，IOHC 即成为保有哈罗校友的主要数据库。在一些情况下，我们可能需要与哈罗国际学校分享阁下的数据，例如阁下的姓名、出生日期及就读期间的情况。我们亦可能需要转发阁下的联系信息予哈

罗国际学校，让校方可将阁下的成绩单、证书、推荐信、学校期刊和节庆邀发送予阁下。

- **法律机关及执法：**若有关披露是防止或侦查罪行必需的，IOHC 将在必要的情况下向有关机关提供阁下的信息。
- **服务供应商：**IOHC 可使用合约规定的服务（例如邮递公司）进行有关业务。
- **入职推荐/资历确应：**IOHC 接获用人单位和私人俱乐部无数关于要求我们确认申请人曾入读哈罗的请求。当收到有关请求后，IOHC 会先寻求阁下的明确同意才发放任何数据。我们只能确认阁下入读学校的时间。因此，若该请求是与阁下资格学历相关的，我们会将有关请求转交予校方。

阁下的权利

阁下清楚认识自己权利，以及阁下享有以下权利，对我们来说是很重要的：

- 请求我们提供有关阁下的信息副本
- 若我们保存的信息不正确，可要求进行更新或修改
- 随时变更阁下的通讯首选方式
- 要求从我们由记录中删除阁下的个人信息
- 反对将阁下信息作营销用途
- 对阁下信息的使用方式表达关切或提出投诉

阁下有权查阅 IOHC 保存关于阁下的信息。此称为数据主体查阅请求 (SAR)，阁下若提出此要求必须提供身份证明。