



## Data Protection Statement for Alumni and Other Supporters

### How we use your personal information

This statement explains how St Edmund's College (“we” and “our”) handles and uses data we collect about alumni and supporters (“you” and “your”). St Edmund's College has separate statements outlining how we handle and use personal data of other constituent groups, such as students and staff – see [www.st-edmunds.cam.ac.uk/data-protection](http://www.st-edmunds.cam.ac.uk/data-protection). In broad terms, we use your data to manage the ongoing relationship between the College and you as part of our lifelong community of scholars. This includes (but is not exclusive to) keeping in touch with you, keeping up to date on your achievements, and engaging with you on how you can continue to contribute to College life and otherwise support the College. We will retain your data indefinitely or until you request us to do otherwise. When changes are made to this statement, we will publish the updated version to our website and notify you by other communication channels as we deem appropriate or necessary.

The controller for your personal information is St Edmund's College, Mount Pleasant, Cambridge CB3 0BN. The Data Protection Officer for the College is the Office of Intercollegiate Services Ltd (12B King's Parade, Cambridge; 01223 768745; [college.dpo@ois.cam.ac.uk](mailto:college.dpo@ois.cam.ac.uk)). OIS Ltd should be contacted if you have any concerns about how the College is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement.

The person within the College with overall responsibility for the protection of information is the Senior Information Risk Owner who at the time of issue is the Bursar ([bursar@st-edmunds.cam.ac.uk](mailto:bursar@st-edmunds.cam.ac.uk)). The person who is responsible for day-to-day monitoring of compliance with relevant legislation and dealing with any concerns relating to the College's data protection arrangements is the College Data Protection Lead, who at the time of issue is the Governance, Risk & Compliance Manager ([grcm@st-edmunds.cam.ac.uk](mailto:grcm@st-edmunds.cam.ac.uk)).

The legal basis for processing your personal data is that it is necessary for the purposes of our legitimate interests, where we have concluded that our interests do not impact inappropriately on your fundamental rights and freedoms, except where elsewhere in this statement we have indicated otherwise. You may ask us to explain our rationale at any time.

### How your data is used by the College

We collect and process your personal data for a number of purposes, including those outlined below:

- A. We maintain a record of your academic progress and achievements at the College and the University of Cambridge and elsewhere. We retain personal data (provided by you or by the University of Cambridge, or created by us), including:
  - your current name and any previous names you have had;
  - unique personal identifiers (e.g. student number, CRSID, date of birth, photograph);
  - your current and previous contact details;
  - your application details, our assessment of your application and the details of any offer(s) of study we have made;

- records of your academic provision from the College (including supervisions, College examinations and other academic support);
- matriculation and graduation details and records of your academic qualifications (including those prior to becoming a member of the College);
- other details of your academic progress or achievement (e.g. College or University awards or prizes).

B. We retain a record of your career, academic successes beyond St Edmund's, or other life achievements in order to promote and improve the reputation of the College and help you to network with other College members effectively. We retain personal data (provided by you), including:

- records of your academic provision from the College (including supervisions, College examinations and other academic support);
- details of your achievements since you completed your course(s) of study;
- membership of College and external clubs and societies (including alumni groups);
- your previous and current employment status (including retirement), including job title, sector, income and work contact details, dates of employment.

When you provide this information, we will assume (unless you notify us otherwise) that we can promote these achievements in our public literature and can use this information for other purposes outlined in this statement. We may supplement information from other public sources that we consider to be reliable (e.g. your public social media profile(s), National Honours Lists, Companies House, high-profile news reports or articles) and may check their accuracy with you from time to time.

C. We retain personal data (provided by you or by the University of Cambridge, or created by us) in order to engage you in College and University events that we believe will be of interest to you, including alumni and open events, volunteering opportunities, and other ways you can contribute to the life of the College. This might include:

- known relationships with other members (past or present) of the University of Cambridge or any of the Colleges;
- your previous attendance at College or University events;
- information about your areas of personal interest;
- personal data relating to your attendance at events and your personal preferences (e.g. dietary or accommodation requirements or requests);
- records of any communications (verbal or written) we have had with you, including the purpose and outcome of those communications.

When you provide this information, we will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement. We may supplement information from other public sources that we consider to be reliable (e.g. your public social media profile(s), University publications, high profile news reports or articles) and may check their accuracy with your from time to time.

D. We retain personal data (provided by you or by the University of Cambridge, or created by us), in order to provide you with information about the development of the College, including major initiatives and programmes relating to either the academic endeavour or the provision of services and facilities to members and the wider public. In particular, we retain:

- any communication preferences confirmed by you;

- ways in which you have supported the College.

By providing us with email addresses and telephone numbers, we have taken this to be consent to use those channels to contact you for this and other purposes outlined in this statement, unless you have told us otherwise.

E. We value any financial contribution from our members: donations form one of our major income streams. Accordingly, we retain personal data (provided by you or by the University of Cambridge, or created by us) in order to encourage you to make a financial contribution to the College and/or the University, and for the processing of any such contributions. In particular, we retain:

- the purposes and amounts of any donations or other support previously provided to the University or the College by you;
- the method(s) of payments used and related payment references;
- your bank details (for processing direct debit or other financial transactions);
- your tax status and Gift Aid declaration.

Some of this financial information needs to be retained for statutory purposes for a number of years (e.g. Gift Aid, anti-fraud, and accounting /audit matters). When you provide this information, we will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement.

F. The College undertakes research to determine the capacity of its alumni and supporters to provide financial support to the College either now or in the future. This results in us creating personal data, including:

- your estimated income or asset worth (where this is not provided by you);
- your potential capacity to make a gift, including our internal classification of you as a major gift prospect which is determined by a combination of your giving history, your attendance at College and University events, and your other interactions with the College since you graduated, including any positive or negative indications from you about your capacity or willingness to give to the College;
- gifts you have made to other charitable organisations where such information is obviously in the public domain.

Our research includes incorporating information from public sources that we consider to be reliable (e.g.: your public social media profile(s), National Honours Lists, Companies House, high-profile news reports or articles). In using these sources, we have considered the potential intrusion of your privacy. In most cases, our assessment above aims to exclude you from unwelcome or inappropriate approaches so as not to compromise your ongoing relationship with us.

We may use external contractors or consultants to assist us in this research. Where we do so, any sharing of your personal data is on the strict understanding that they may not repurpose it, or pass it on to other third parties. We do not sell your personal data under any circumstances.

G. We retain personal data (provided by you) in order from time to time to promote third party services we believe will be of interest to you. The personal data we retain provided by you includes any preference to be excluded from such services.

## Communications

If you are a new contact for our Development Office, we will ask you at the outset how you would like to receive news and other communications from us. If you are already receiving such communications, you are able to change your preferences (or ask us to stop sending you news and other communications completely) by contacting the Development Office by post (The Development Office, St Edmund's College, Mount Pleasant, Cambridge CB3 0BN), by phone (+44 (0) 1223 760877), or by email ([development@st-edmunds.cam.ac.uk](mailto:development@st-edmunds.cam.ac.uk)). You may request changes at any time.

Additionally, if you are already receiving our termly electronic newsletter you can unsubscribe from this at any time by clicking the “unsubscribe” link included in the email.

## How we share your personal information

We believe that most alumni understand in detail the complex and many interactions of the College with the University of Cambridge. Personal data of our members is shared with the University routinely throughout any course of study, and it is our strong preference to continue such collaborative working thereafter.

The University and its partners (including the College) have a data sharing agreement to govern the sharing of personal data of alumni and other supporters. This is necessary because they are distinct legal entities. The agreement outlines that, depending on constraints set by you, and which you may change at any time, the University and College may share any of the above categories of personal data with the University.

The agreement can be viewed in full at <https://www.ois.cam.ac.uk/policies-and-protocols/data-sharing-protocols>. Any transmission of data to or from the University is managed through agreed processes which comply with UK data protection legislation.

For clarity, the College has a separate database from the University, but has access to the University's database: additionally, we maintain other electronic and paper records.

The University has its own data protection statement and procedures – see: <https://www.alumni.cam.ac.uk/data-protection>

Additionally, we share data on a considered and confidential basis, where appropriate, with:

- Cambridge in America (the University's affiliate alumni office in the USA),
- third-party agencies who provide us with data in the public domain about alumni and supporters, as outlined above,
- selected companies who provide College-branded or College-endorsed products and services, as outlined above,
- volunteer partners closely related to us (e.g. College trustees, Development Committee members, alumni group (including the Alumni Society) representatives), and

- contractors providing services to you on our behalf or services to us (our “data processors”), as outlined above.

We also facilitate communication between individual alumni (of the College or the University), but in doing so we do not release personal contact details without prior permission.

Any transfers of your data overseas or to international organisations, as set out above, are protected either by an adequacy decision by the European Commission or by standard data protection clauses adopted by the European Commission (which are available from our Data Protection Officer, the Office of Intercollegiate Services Ltd (12B King’s Parade, Cambridge; 01223 768745; [college.dpo@ois.cam.ac.uk](mailto:college.dpo@ois.cam.ac.uk)).

## **Your rights**

You have the right: to ask us for access to, rectification or erasure of your data; to restrict processing (pending correction or deletion); to object to communications or direct marketing; and to ask for the transfer of your data electronically to a third party (data portability). Some of these 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.

Where you opt out of all future communications or exercise your right to erasure, we will continue to maintain a core set of personal data (name, subject(s), matriculation and graduation details, unique University identification number and date of birth) to ensure we do not contact you inadvertently in future, while still maintaining our record of your academic achievements. We may also need to retain some financial records about you for statutory purposes (e.g. Gift Aid, anti-fraud and accounting/audit matters).

You retain the right at all times to lodge a complaint about our management of your personal data with the Information Commissioner’s Office at <https://ico.org.uk/concerns>.