



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 personal 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. 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 limited 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 for as long as necessary for the purposes set out in this statement, including maintaining a lifelong alumni record, supporting the College’s legitimate alumni relations, fundraising, archival and historical purposes, and complying with legal or regulatory requirements, unless you ask us to stop processing it and we are able to do so.

This Data Protection Statement is reviewed regularly and updated where necessary to reflect changes to the College’s processing activities, including where personal data is used for a new or materially different purpose. When changes are made to this statement, we will publish the updated version on 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 Intercollegiate Services Limited (ISL) (64 Bridge Street, Cambridge CB2 1UR; 01223 768745; dpo@isl.colleges.cam.ac.uk). ISL 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. The Bursar can be contacted at bursar@st-edmunds.cam.ac.uk. Day-to-day responsibility for monitoring compliance with relevant legislation and dealing with concerns relating to the College’s data protection arrangements sits with the College Data Protection Lead, who at the time of issue is the Governance, Risk & Compliance Manager. The Governance, Risk & Compliance Manager is the primary contact for all data protection matters and can be contacted at grcm@st-edmunds.cam.ac.uk. This is also the address to use if you wish to exercise any of your data protection rights, including requesting copies of personal data the College holds about you, or making a complaint about how the College has managed your personal data.

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. For some activities, we may rely on another lawful basis, for example where processing is necessary to comply with a legal obligation, to perform a contract with you, to protect vital interests, or where you have given consent. Where we process special category data, such as dietary, health, disability, religious or other sensitive information provided in connection with events or communications, we will also identify an appropriate condition under Article 9 UK GDPR.

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 may use it for the purposes outlined in this statement, including maintaining our alumni records and, where appropriate, recognising or promoting alumni achievements. Where a proposed use would involve making information publicly available and consent is required, we will seek this separately. 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), where this is necessary and proportionate for the purposes set out in this statement, 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 may use it for the purposes outlined in this statement, unless you tell us otherwise or object where the law gives you a right to do so. 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 you from time to time.

If you attend College premises or College events, you may also be captured by CCTV or Automatic Number Plate Recognition (ANPR) systems. These may capture images of individuals and, in the case of ANPR, vehicle registration marks. CCTV and ANPR are used for purposes including safety and security, crime prevention and detection, protection of College buildings, assets and information, management of emergencies and incidents, health and safety, and parking management and enforcement. Routine CCTV and ANPR recordings are normally retained for no more than 30 days, unless they are required in connection with an incident, investigation, legal claim or other lawful purpose. Our CCTV and ANPR policy can be viewed at www.st-edmunds.cam.ac.uk/data-protection.

- 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.

We will use your contact details to communicate with you in accordance with your communication preferences and applicable law. Where consent is required for a particular type of communication, including under the Privacy and Electronic Communications Regulations, we will rely on consent. In other cases, we may rely on legitimate interests, where we have assessed that our interests are not overridden by your rights and freedoms. You may change your communication preferences or ask us to stop sending you particular types of communication at any time.

- 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 may use it for the purposes outlined in this statement where this is necessary and lawful, including administering

donations, maintaining donor records, meeting legal and accounting requirements, and managing our relationship with you as an alumnus/a or supporter.

- 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 will consider the potential intrusion on 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. You may object to this type of processing or ask us not to use your personal data for prospect research at any time.

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. Where a third party processes personal data on our behalf, appropriate contractual arrangements will be in place. 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 includes any preference to be excluded from such services. We will only send you such communications where this is consistent with your communication preferences and applicable law.

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). You may request changes at any time. Where you object to direct marketing, we will stop sending you direct marketing communications unless there is a lawful reason not to do so.

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 where this is necessary, proportionate and consistent with applicable data protection law and any preferences or restrictions you have notified to us.

The University and its partners (including the College) have a data sharing protocol 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. 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. We also 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.

Where personal data is transferred outside the UK and the UK GDPR transfer rules apply, the College will ensure that an appropriate transfer mechanism and any required safeguards are in place. This may include reliance on UK adequacy regulations, the UK International Data Transfer Agreement or Addendum, or another lawful transfer mechanism. Further information is available from the Data Protection Officer using the contact details above.

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 processing in certain circumstances, including direct marketing communications; 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 the law allows us to do so.

Where you opt out of all future communications or exercise your right to erasure, we may 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 and lifelong membership of the College. We may also need to retain some financial records about you for statutory purposes (e.g. Gift Aid, anti-fraud and accounting/audit matters).

Complaints

If you are concerned about how the College has handled your personal data, you may raise this with the College Data Protection Lead, the SIRO or the DPO using the contact details above. The College will consider data protection complaints fairly and proportionately, and will normally acknowledge receipt within 30 days.

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