PART 1 – GENERIC PRIVACY NOTICE

St Chad's College's responsibilities under data protection legislation include the duty to ensure that it provides individuals with information about how it processes personal data. It does this in a number of ways, one of which is the publication of privacy notices. Our privacy notices comprise two parts – a generic part and a part tailored to the specific processing activity being undertaken.

Data Controller

The Data Controller is St Chad's College, Durham. If you would like more information about how the College uses your personal data, please see the College's website or contact:

The Revd Dr Ashley Wilson, Vice-Principal Telephone: 0191 334 3358 E-mail: <u>ashley.wilson@durham.ac.uk</u>

Data Protection Officer

The Data Protection Officer is responsible for advising the College on compliance with Data Protection legislation and monitoring its performance against it. If you have any concerns regarding the way in which the College is processing your personal data, please contact the Data Protection Officer:

The Revd Dr Ashley Wilson, Vice-Principal Telephone: 0191 334 3358 E-mail: <u>ashley.wilson@durham.ac.uk</u>

Retention

A link to the Durham University Records Retention Policy can be found in the 'Official Documents' section of the St Chad's College website.

Your rights in relation to your personal data

Privacy notices and/or consent

You have the right to be provided with information about how and why we process your personal data. Where you have the choice to determine how your personal data will be used, we will ask you for consent. Where you do not have a choice (for example, where we have a legal obligation to process the personal data), we will provide you with a privacy notice. A privacy notice is a verbal or written statement that explains how we use personal data.

Whenever you give your consent for the processing of your personal data, you receive the right to withdraw that consent at any time. Where withdrawal of consent will have an impact on the services we are able to provide, this will be explained to you, so that you can determine whether it is the right decision for you.

Accessing your personal data

You have the right to be told whether we are processing your personal data and, if so, to be given a copy of it. This is known as the right of subject access. You can find out more about this right on Durham University's Subject Access Requests webpage: https://www.dur.ac.uk/ig/dp/sar

Right to rectification

If you believe that personal data the College holds about you is inaccurate, please contact us and we will investigate. You can also request that we complete any incomplete data.

Once we have determined what we are going to do, we will contact you to let you know.

Right to erasure

You can ask us to erase your personal data in any of the following circumstances:

- We no longer need the personal data for the purpose it was originally collected
- You withdraw your consent and there is no other legal basis for the processing
- You object to the processing and there are no overriding legitimate grounds for the processing
- The personal data have been unlawfully processed
- The personal data have to be erased for compliance with a legal obligation
- The personal data have been collected in relation to the offer of information society services (information society services are online services such as banking or social media sites).

Once we have determined whether we will erase the personal data, we will contact you to let you know.

Right to restriction of processing

You can ask us to restrict the processing of your personal data in the following circumstances:

- You believe that the data are inaccurate and you want us to restrict processing until we determine whether they are indeed inaccurate
- The processing is unlawful and you want us to restrict processing rather than erase it
- We no longer need the data for the purpose we originally collected them but you need them in order to establish, exercise or defend a legal claim and
- You have objected to the processing and you want us to restrict processing until we determine whether our legitimate interests in processing the data override your objection.

Once we have determined how we propose to restrict processing of the data, we will contact you to discuss and, where possible, agree this with you.

Making a complaint

If you are unsatisfied with the way in which we process your personal data, we ask that you let us know so that we can try and put things right. If we are not able to resolve issues to your satisfaction, you can refer the matter to the Information Commissioner's Office (ICO). The ICO can be contacted at:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Telephone: 0303 123 1113 Website: https://ico.org.uk/

PART 2 – TAILORED PRIVACY NOTICE

This section of the Privacy Notice provides you with the privacy information that you need to know before you provide personal data to the College for the particular purpose(s) stated below.

Alumni Relations and Fundraising

St Chad's College's Development and Alumni Relations Office supports a global community of stakeholders (students, alumni, parents, donors, mentors, employers, researchers, policy-makers, and advocates) related to the research, engagement and outreach activities pursued by St Chad's College. In order to deliver all of the related products, services and opportunities in a bespoke manner and to ensure each individual and constituency receives relevant information, the College processes personal data of stakeholders. This helps to ensure that they are getting the best contact available from the College for their purposes. This also helps the College, where appropriate, to ask for support.

Type(s) of personal data collected and held by the St Chad's College Development and Alumni Relations Office and method of collection:

If you are a student/graduate, some of the personal data that the College holds about you is transferred from your student record to the University's alumni database, Raiser's Edge. This personal data will have been collected from you as part of your studies application process or provided by you via updates to your department or college during your time as a student and will include:

- Your name, title, gender preference, nationality and date of birth;
- Your home or parental address, email address and telephone numbers;
- Your former school and/or university;
- Your familial relationships (parents, grandparents and siblings);
- UCAS Number.
- Some of the personal data held about you has been created by the College or University as part of your education record, namely:
- Mode of study (e.g. full-time, part-time, distance learning);
- Academic department and programme of study;
- Start, end and graduation dates;
- Reason for leaving, type and classification of degree;
- The college you attended and your membership of a Junior or Middle Common Room (JCR/MCR)/clubs/societies/sporting teams.

Some of the personal data held about you is provided by you during your transactions with us or authorised alumni volunteers (contact details updates, website activity, event registration and attendance, volunteer activity or making/soliciting a donation), namely:

- Your bank account number, name and sort code (used for processing Direct Debits);
- Gift amount, purpose, date and method of payment including cheque numbers or payment references. At no point do we store payment card details if you donate, or pay for an event, using a payment card;
- Tax status and Gift Aid Declaration information;
- Your spouse/partner's name and whether they are also a Durham alumna/nus;
- Updates to your contact details;
- Children's names, gender and year of birth;
- Record of verbal or email conversations/meetings including any personal interests;
- Dietary preferences;
- Web activity whilst visiting alumni.stchads.ac.uk

The database may hold personal data relating to your professional history. This data may have been provided by you, or it may have been obtained from social media (e.g. LinkedIn, Facebook) or publicly available sources (Companies House and other business-related resources, the World-Wide-Web, publications and news articles such as Queen's Honours List, Times Rich List, and the National Change of Address File and other services that provide email addresses and telephone numbers), namely:

- Your employment status (e.g. part-time, full-time, retired);
- Your current job title and work email address;
- Your previous role(s) and job title;
- Your current and past employers, name, address and telephone number;
- The dates that you have been employed in any particular role;
- Your photograph;
- Your income band.

The database may hold personal data that has been created by the University or St Chad's College from other personal data that we already hold (i.e. name, address, postcode, employment data), either through internal or external research/profiling, namely:

- Your estimated asset worth, property value and shareholdings;
- Qualification of prospective level of giving;
- Philanthropic interests and gifts to other charitable organisations;
- Internal classifications and ratings as a major gift prospect;
- A rating of your level of engagement which is created from a mix of your event attendance, donation history and other interactions with the University.

Legal Basis

When processing your personal data the College relies on a combination of Consent, Contract, Legal Obligation or Legitimate Interests as the legal basis under the GDPR, as detailed in the table below. Where the College relies on Legitimate Interest you have the right to object to your data being processed for the purposes stated (see section entitled 'How to object to the College processing your personal data' below). However, if the College stops processing data for the stated purposes this may impact our ability to undertake certain activities that you have asked us to undertake, such as claiming Gift Aid on your donations if you object to your name and address being processed. If this is likely to happen, we may refer back to you to obtain clarification that this is what you intend.

The Legitimate Interests that are being pursued in the processing of personal data are:

- To establish, maintain and enhance the College's relationship with alumni in the pursuance of a lifelong mutually beneficial partnership that benefits the alumni community and the College's student community;
- To attract and retain donors and supporters in the pursuance of the College's strategic objectives to generate philanthropic income and to diversify income streams.

Processing Activity	Legal Basis
Creating your record in our relationship management system (Raiser's Edge)	Legitimate Interests or Consent
Verifying your identity (alumni)	Legitimate Interests or Contract
Processing your contact preference forms	Consent
Meeting our obligations in relation to the Telephone Preference Service	Legal Requirement
Sending you direct mail by post	Legitimate Interests
Processing your gifts	Contract and Consent
Processing our Gift Aid claims	Consent and Legal
Event registration and management	Contract and Consent
Volunteer registration and management	Contract and Consent
Career mentor/mentee registration and management	Contract and Consent
Donor stewardship	Legitimate Interests, Contract and Consent
Conducting our telephone campaigns (fundraising)	Legitimate Interests
Identifying potential major gift supporters and qualifying prospective levels of giving	Legitimate Interests
Conducting due diligence on prospective major donors	Legal Requirement or Legitimate Interests
Major donor cultivation and solicitation	Legitimate Interests
Making legacy estimates/valuations	Legitimate Interests
Analysis of visits to our website	Legitimate Interests

Analysis of the effectiveness of our email communications	Legitimate Interests
Reporting and benchmarking performance	Legitimate Interests
Responding to our obligations in relation to the Higher Education Statistics Agency Destination of Leavers from Education Longitudinal Survey	Consent
Participating in higher education ranking or league tables providers with whom we hold a data sharing agreement	Consent

How personal data is stored by the College

Personal data of alumni, donors and other stakeholders are stored by the College in a propriety cloud-based database supplied by Blackbaud, Inc. called Raiser's Edge (RE) under a contract for service. RE is hosted by Blackbaud on their servers located in the EEA. This database is provided to St Chad's College by Durham University and data is shared as agreed through a data sharing agreement. Access to personal data is restricted to certain staff in St Chad's College and the University and any other member of staff who have a requirement to maintain a relationship with you, and is controlled through password protection and user security profiles. Blackbaud, Inc. do not permit their staff to have access to the personal data stored in RE.

The personal data of some alumni and supporters may be stored in a proprietary software application used to manage the telephone campaign. This software is hosted in the 'cloud' by the third party supplier company only for so long as is necessary for the period of the telephone campaign. Access to the software is restricted to students employed under a contract to make calls to alumni and supporters, the campaign manager and College staff and is controlled through username and password.

All College employees, contractors and volunteers that are given access to personal data receive mandatory Data Protection training and have a contractual responsibility to maintain confidentiality.

How personal data are processed by the College:

Personal data are processed by the College to:

- Promote events;
- Send news and updates;
- Recruit alumni volunteers and mentors;
- Acknowledge gifts and to keep donors updated on the impact of their gift(s);
- Make fundraising appeals by email, direct mail, telephone and face-to-face meetings and ensure that we only send you communications about events or fundraising appeals that would be of interest to you;
- Report internally and externally and to undertake benchmarking.

Automated decision-making and profiling

Personal data are processed by the College for a variety of purposes (detailed above) for which, in the interests of efficiency or effectiveness, or to meet the specific preferences of data subjects, profiling takes place. For example:

- To communicate with alumni
- To inform event hosts about attendees and their relationship to the College;
- To qualify prospective levels of giving;
- To undertake due diligence on prospective major donors;
- To produce summary data to report internally and to undertake benchmarking.

Automated decision-making takes place in only a limited number of instances (for example, to produce ask amounts for the periodic telephone campaigns) but there would be no legal or significant impact on you as a result of this decision making.

Who the College shares personal data with:

Personal data are shared with third party organisations in a limited number of instances.

If you are a member of our alumni and/or donor community and our records show that you reside in the United States of America (USA), your personal data may be shared with the North American Foundation for the University of Durham (Dunelm USA) who have an independent 501c3 status in the USA, for the purpose of alumni relations and fundraising. For students, prospective students/parents, alumni and donors who have interacted with DunelmUSA, a reciprocal data sharing agreement is in place whereby the College may receive personal data relating to you.

Additionally, we share data on a considered and confidential basis, where appropriate, with affiliated organisations and individuals which support and provide services to alumni and supporters, such as volunteer partners closely related to us (e.g. development and advisory board members).

DARO may share personal data with other third party organisations which carry out contracts on behalf of the College (such as a venue hosting a College event). DARO will only share personal data that is relevant and proportionate. The College's partners are subject to contractual agreements which help to ensure compliance with Data Protection legislation. This will happen in the following circumstances:

- To send you a copy of our printed alumni magazine or other newsletters;
- To send you direct mail relating to our fundraising appeals;
- To maintain your contact details so that we can keep in touch by letter, email or telephone;
- To populate software used to manage our telephone campaigns;
- To assess prospective levels of giving;
- To provide consultancy services when undertaking a major fundraising appeal.
- To the provider of our alumni platform website

When the College shares personal data as detailed above we ensure that security is maintained, using tools such as encryption and secure file transfer protocols.

Personal data are NEVER sold on to third parties.

How long personal data are held by the College:

This information is additional to the information in Part 1 about Retention.

The College considers its relationship with alumni, donors and other stakeholders to be life-long. This means that it will maintain a stakeholder record for you until such time as you tell us that you no longer wish us to keep in touch. In this instance the College will delete the majority of your personal data it holds, but in the case of alumni will maintain basic personal data to ensure that we do not inadvertently create a new or duplicated record in the future.

How to object to the College processing your personal data:

Individuals have the right to object to the College processing their personal data for any or all of the purposes set out in this Privacy Notice; they may do so at any time. To exercise this right, please write to:

Mark R I Roberts Director of Development St Chad's College, 18 North Bailey, Durham, DH1 3RH <u>m.r.i.roberts@durham.ac.uk</u>

giving clear details of the processing activities and/or types of personal data to which your objection applies (see sections above for descriptions).

Visitors to our websites/webpages:

When someone visits <u>alumni.stchads.ac.uk</u> we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be transparent about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Use of cookies:

You can read more about how we use cookies in the 'Official Documents' section of the St Chad's College website.

Links to other websites:

This privacy notice does not cover the links within our website linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Changes to this privacy notice:

We keep our privacy notice under regular review. This privacy notice was last updated on 22nd July 2020.

Further information:

If you have any questions which you feel have not been covered by this Privacy Notice, please do not hesitate to email us or write to:

The Revd Dr Ashley Wilson Vice-Principal St Chad's College, 18 North Bailey, Durham. DH1 3RH ashley.wilson@durham.ac.uk