

# Alumni, Donors and Friends Privacy Notice

## Introduction

Royal Holloway and Bedford New College, also known as Royal Holloway, University of London, will act in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 when controlling and processing your personal data.

This notice explains how we collect, use and share your personal data and your rights in relation to the processing of your data.

In this notice:

- **'personal data'** means any data which can identify you directly or indirectly (whether by itself or when combined with other data), regardless of the format or media on which the data are stored. This includes data that can identify you when combined with other data that is held separately (pseudonymous data) but does not include data that has been manipulated so that you can no longer be identified from it (anonymous data).
- **'processing'** means any activity relating to your personal data including collection, use, alteration, storage, disclosure and destruction.
- **'alumni'** means anyone who graduated from the university, or attended the university for 100 days or more, Honorary Awardees, former employees
- **'donors'** means anyone who has made a donation to the university
- **'staff and senior volunteers'** includes Council and Advisory Board members and Project Ambassadors
- **Friend of Royal Holloway** – Parents, event attendees, local dignitaries and community contacts

The External Relationships team keeps in touch with our alumni, friends and donors, providing benefits and services to them and engaging in relationships with potential and existing donors.

## What personal data will be collected

The data the College collects includes:

- Personal details such as name and date of birth
- Personal contact details such as email address and mobile phone number
- Biographical information
- Education, professional qualifications details
- Details of scholarships or awards received
- Employment history
- Details of your interactions with Royal Holloway
- Publicly available information such as relevant areas of interest
- Donations made to Royal Holloway
- Communication preferences

## How and when do we collect your personal data?

Alumni – All Royal Holloway student's names, degree, contact details and other relevant information are copied from the Registry database (currently Banner) and used to create a record for you on the Alumni database (currently Raiser's Edge).

Donors – We obtain personal information from you when you make a donation through our donation forms (paper or digital).

Staff and Senior volunteers – We obtain personal information from the individuals themselves or from HR and College Secretariat.

Friend of Royal Holloway – We obtain personal information from you when you enquire about our activities, register for an event or otherwise provide us with personal information.

We will collect your data in the following instances:

- when you engage with us, by phone, email or social media
- when you register to attend events
- when you update your record online
- when you volunteer at an event
- when you make a donation

## Personal data from third parties

We may on occasion receive information about you from third parties such as a friend who wants us to tell you about the activities we carry out. Where phone numbers or email addresses are provided by a third party we will only use them to contact you if you have given your permission.

We may also collect publicly available information or receive information from our service providers.

## Why do we collect this data, how do we use it and what is our legal basis for doing so?

Service provision – the External Relationships and Careers team offer a range of services which are available to you after you graduate.

The university relies on the use of legitimate interests, both ours and your own, to process your data in order to provide you with these services.

These services include:

- Providing Careers support for up to two years after your graduation
- Enabling you to access the university library
- Keep you up to date with news and events happening at the university including reunions
- Enable you to utilise your alumni rights to be married on campus
- Keeping your personal details up to date
- To facilitate connections between alumni

Charitable aims – the External Relations team is also responsible for fundraising, collecting donations and the charitable work of the College.

We process your data to further these aims on the basis of our own and others legitimate interests. We will use your data to contact you about fundraising activities through post, email and telephone, unless you have told us you do not wish to receive direct marketing messages.

We may create a summary of your relationship with the university and your interests and preferences so that we can contact you in the most appropriate way and with the most relevant information and we can avoid contacting you about opportunities which are not relevant to your interests. By creating this profile, we are able to work more effectively with our alumni, donors and friends to support the work of the College.

In circumstances where you have a genuine choice as to whether we should process your personal data, we will ask you for your **consent**. The method used to obtain your consent will depend on the scope and context of the processing that we propose.

In relation to special categories of personal data and personal data relating to criminal convictions and offences, we may request your **explicit consent** unless a condition applies which allows us to process such personal data without doing so.

## How long the university will retain your personal data

The university must only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Specified retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, the university has taken into account:

- the nature, sensitivity and volume of the personal data
- the potential risk of harm to you arising from the university continued retention of the personal data
- the purposes for which the university may process your personal data
- whether the university is required to retain any personal data by law or in accordance with its legitimate interests

Your data will be kept in accordance with the university's Records Retention Policy and Schedule.

## Personal data provided by you about others

You may provide us with personal data about other individuals, for example, next of kin/emergency contact details and information about your family circumstances and dependents. You should notify the relevant person that you are providing their contact details to the university and in what capacity (i.e. as your listed next of kin/emergency contact).

## CCTV and automatic number plate recognition (ANPR)

The university has a comprehensive, image-only CCTV surveillance system across its campus. Cameras located on and within buildings are monitored by Security. On occasions, Security staff will wear Body Worn Cameras in the course of their duties. These cameras record both images and sound, and data captured in this manner is processed in compliance with GDPR.

The university uses ANPR (Automatic Number Plate Recognition) camera technology to manage, control and enforce parking on its sites. They are governed under guidelines from the Information Commissioner's Office on the use of CCTV and ANPR Cameras and are operated by university's Security team.

## Sharing your personal data with third parties

We never sell any of your personal information.

Where the university uses third parties to process personal data on its behalf (acting as data processors), a written contract will be put in place to ensure that any personal data shared will be held in accordance with the requirements of data protection law and that such data processors have appropriate security measures in place in relation to your personal data.

This includes the following:

- Companies which provide up to date address records
- Mailing services
- Aluminati Network Group Ltd.
- Blackbaud Inc
- Smarteezie

We may also pass your information to trusted third parties who will use your data, along with that which is publicly available, to provide us with wealth analysis which helps us to understand who may be able to support us with particular projects.

We may attribute a particular score to your record which will have been calculated using personal data, as well as how engaged with us you have previously been, and indicators of future engagement.

We may publish your current name in our alumni and donor publications or the website and the fact that you are a donor to Royal Holloway only if you consent to this. You are given the option to remain anonymous on the donation form.

Parents, family members and guardians are considered to be third parties and your personal data will not be disclosed to such persons unless you have given your consent or the disclosure is otherwise made in accordance with data protection law.

Please note that in certain circumstances we may need to share your personal information with a regulator or to otherwise comply with the law.

## International Data Transfers

Most personal data about you, including your personnel file, will be stored on servers within the UK or elsewhere within the European Economic Area (EEA).

On occasion it may be necessary for the university to transfer your personal data outside of the European Economic Area (EEA). This will only take place in circumstances where there are appropriate and adequate safeguards in place which incorporate appropriate assurances to ensure the security of the information and compliance with legislative and regulatory requirements.

## How the university keeps your personal data secure

The university has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way or altered or disclosed. In addition, the university limits access to your personal data to the persons and organisations, including those described above, who have a lawful and/or legitimate need to access it.

The university has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where legally required to do so.

Royal Holloway does not process credit card details for online donations; these are only handled by our PCI accredited Merchant Service provider (Blackbaud Merchant Service). We do not store your credit or debit card details at all, following the completion of your transaction. All card details and validation codes are securely destroyed once the payment or donation has been processed.

## You and your data

You have a number of rights in relation to the processing of your personal data by the university:

- **Access:** You have the [right to request access](#) to and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data to check that the university is processing it lawfully and fairly.
- **Correction:** You have the [right to request correction](#) of any inaccurate or incomplete personal data held about you.
- **Deletion:** You have the [right to request erasure](#) of any personal data held about you where there is no good reason for the university to continue processing it or where you have exercised your right to object to the processing of your personal data.
- **Restriction:** You have the [right to request restriction](#) of how the university processes your personal data; for example, to confirm its accuracy or the university reasons for holding it or as an alternative to its erasure.
- **Objection:** You have the [right to object](#) to the university processing of any personal data which is based on the legitimate interests of the university or those of a third party based on your particular circumstances. You also have the right to object to the university processing your personal data for direct marketing purposes.
- **Portability:** You have the right to receive or [request that the university transfers](#) a copy of your personal data in an electronic format where the basis of the university processing such personal data is your consent or the performance of a contract, and the information is processed by automated means.
- **Complaints:** You have the right to complain to the [Information Commissioner's Office \(ICO\)](#) in relation to how the university processes your personal data. Our registration number with the Information Commissioner's Office is Z7056965.

The university may be entitled to refuse any request in certain circumstances and where this is the case, you will be notified accordingly.

Where the lawful ground relied upon by the university to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason. However, if you do so, the university may not be able to provide some or all of its services to you or the provision of those services may be affected.

You will not have to pay any fee to exercise any of the above rights, though the university may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, you will be notified accordingly.

To protect the confidentiality of your personal data the university may ask you to verify your identity before fulfilling any request in relation to your personal data.

## Changes to this notice

The university may update this notice at any time and may provide you with further notices on specific occasions where we collect and process personal data about you. You should check this notice regularly to take notice of any changes. Where any change affects your rights and interests, we will make sure we bring this to your attention and clearly explain what this means for you.

## Questions or comments

If you have any questions or comments regarding this notice or you wish to exercise any of your rights you should contact our Data Protection Officer by email at [dataprotection@royalholloway.ac.uk](mailto:dataprotection@royalholloway.ac.uk).

You also have the right to complain to the Information Commissioner's Office and you can find more information on their website – [www.ico.org.uk](http://www.ico.org.uk)