

University of Strathclyde

Alumni & Development – Privacy Notice Published 25th May 2018

1. **Connecting with Strathclyde**

The University of Strathclyde is a leading international technological university and we are proud to have a global network of alumni and supporters.

We want to stay in touch and deepen links with the Strathclyde family at home and around the world. The University aims to keep in touch with all alumni, provide services to them, seek their support and maintain relationships with non-alumni friends, donors and potential donors.

Our alumni include all former students who attended the University and its founding and predecessor institutions, including: graduates, former students who received non-graduating qualifications or no award and former exchange students.

The University is committed to protecting your personal information in accordance with the laws concerning data protection and personal information. This privacy notice explains how the University uses your personal data for fundraising and alumni relations purposes.

The University of Strathclyde is the data controller as the organisation in control of processing your personal data.

2. **Why we collect your information**

Your information is used by the University's Alumni & Development Office to keep in touch with you, to better understand how we can help you and how you might support Strathclyde. Collecting your information helps to keep you informed of alumni activities and university developments, to provide services to you and to identify fundraising programmes which may be of interest to you to support, through donations and other forms of financial and non-financial support. Ultimately, collecting and using your information allows us to better support our alumni and advance the aims of the University.

We will contact you about news and developments concerning the University. Some examples include:

- details of alumni activities and programmes including events and volunteering opportunities;
- activities of academic and administrative departments;
- fundraising programmes or campaigns;
- alumni surveys;
- promotion of benefits and services.

3. The lawful bases for processing your information

The main lawful basis for processing your personal data for the purposes set out in this Privacy Notice is that it is necessary for the pursuit of the University's legitimate interests. We will always handle your personal data securely and minimise its use, and there is no overriding prejudice to you by using your personal information for these purposes. In addition, there is no statutory or contractual requirement for you to provide us with any personal data.

The Alumni & Development Office processes the information outlined in this Privacy Notice in pursuit of our legitimate interests in:

- communicating with students, staff, alumni, and current and potential supporters;
- providing benefits and services to students, staff, alumni and supporters;
- furthering the University's educational charitable mission (which includes fundraising and securing the support of volunteers);
- enabling the University to achieve its strategic and operational goals.

Whilst we rely on legitimate interest as the lawful basis for processing where this is not overridden by the interests and rights or freedoms of the data subjects concerned, we also recognise that it is not the only lawful ground for processing data. As such, where appropriate, the Alumni & Development Office will sometimes process your data on an alternative lawful basis – for example, because you have given us consent to do so e.g. email communications regarding our activities, events, programmes and fundraising appeals, or where we have a public task to do so.

4. Your information

The Alumni & Development Office maintains a record of all former students of the University and, as such, we hold alumni records in perpetuity. We also record personal information that you give us during your interaction with the University e.g. registering for an event, making a donation, professional activities or updating your details. The data we hold includes:

- name, title, gender and date of birth;
- contact details including postal address, email address, phone number and links to social media accounts;
- information about your time at the University and other academic institutions;
- your career highlights and other life achievements;
- your recreations and interests;
- family and spouse/partner details and your relationships to other alumni, supporters and friends;
- records of donations and Gift Aid status, where applicable (as required by HMRC);
- bank details of regular donors;
- records of communications sent to you by the Alumni & Development Office or received from you;
- volunteering by you on behalf of the University;
- information relating to your financial ability and willingness to make donations, your philanthropy and other giving;
- media articles about you;
- information on your engagement in University meetings, events, groups or networks;
- sensitive personal data (e.g. data relating to physical disabilities) which will only be held if it has been provided by you for a specific purpose (e.g. event planning);

- information about your use of www.strath.ac.uk and www.alumni.strath.ac.uk including your IP address, location, browser type, referral source, length of visit, number of page views and navigation around our website.

In accordance with the [Privacy Notice for Students \(Registered or Accepted an Offer to Study\)](#), students' personal and educational data is transferred to the Alumni & Development Office twice a year prior to graduation ceremonies.

Information sources

The majority of the personal data we store and process is given to us by our alumni and supporters, but we may obtain some data from other publicly-available sources. These include:

- public sources for companies such as Companies House and US Securities and Exchange Commission, as well as company websites;
- public sources for charities such as the Charity Commission and OSCR;
- public sources for individuals such as the Queen's Honours Lists, National change of address services and professional networking sites such as LinkedIn;
- reputable press sources.

Data analysis

The University of Strathclyde was founded with the help of philanthropy and donors continue to make a major impact at the University. As we are a fundraising institution we may gather information about you to understand more about you as an individual and your ability to support the University, including financially.

We combine the information you provide to us with information available from external publicly-available sources, such as those listed above. This is known as data-appending and enables us to re-connect with you in the event that you have changed your address, job, phone number or email address and not provided it to us.

Data may also have been obtained from recognised third parties such as the Post Office's National Change of Address database via a contractually bound service provider.

We may also use information from publicly-available sources, such as those detailed above, to carry out research to assess your inclination and capacity to support the University financially or by volunteering your time. This is known as prospect research and may include collecting and storing data relating to you that is in the public domain (such as career history and directorships) as well as data that has been provided by you.

We may use automated or manual analyses to link data together and to ensure communications are relevant and timely, and to provide an improved experience for our alumni and supporters. Understanding your background, capacity and willingness to support University projects helps us make appropriate requests at the right time and level for you.

Updating your contact details

We value our relationship with you and we will use your personal data to ensure we contact you in the most relevant and appropriate way, to improve our services and ensure we work efficiently and effectively.

In order to keep your details up to date, we will check against publicly-available sources to verify whether the contact details we have for you are correct, and, where appropriate,

update them. We really appreciate you letting us know when you have moved, changed job or have a new phone number or email address.

We may process your personal data, including data from the public domain, for due diligence purposes if you are being considered for an award, speaking at or attending an event, or where you wish to make a gift to the University, as noted in our [Supporter Promise](#).

Managing your information

Information about how you can manage the ways that we contact you, including how to opt out from some or all contact from the Alumni & Development Office, is outlined in section 8 - 'Your rights and changes to this policy'.

You have the right to:

- ask us for access to, or rectification or erasure of your data
- restrict processing (pending correction or deletion)
- object to communications or direct marketing

Where you 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. If you are not a member of the alumni community, your personal data – except for minimal identification details to prevent you being inadvertently added again to the Alumni & Development Office records – will be deleted should you not respond to our attempts to contact you, or should you state that you have no interest in forming a relationship with the University. We may also need to retain some financial records about you for statutory purposes (e.g. Gift Aid, anti-fraud and accounting matters).

When the University shares your data with others (our partners)

The security of your data is important. The Alumni & Development Office will never sell your data. We will also never share your data with anyone to use for their own purposes unless disclosure is permitted or required by law.

The University may engage third parties to undertake marketing or fundraising projects on our behalf. Any such companies are acting as agents of the University and the University retains full responsibility for your personal data. Any transfers of data will be done securely and in accordance with best practice and in compliance with applicable data protection legislation.

All UK universities are obliged to give contact details for a survey of recent graduates/completers to the [Higher Education Statistics Agency](#) (HESA) in order to conduct a survey of graduate/completer destinations. This is called the Graduate Outcomes Survey. If you have opted out of receiving communications from the Alumni & Development Office, we are still required to pass your contact details to HESA for the Graduate Outcomes Survey. HESA will provide you with the option to opt out of future surveys when they contact you.

Where necessary, to assist with the organisation and security of an event we may pass attendee names and University education details, i.e. year and subject of study, to the event organiser. This may include alumni group volunteers and the University of Strathclyde USA Foundation Board. Typically, only your name and education details will be passed on. Personal contact details will only be shared where there is a need to do so, e.g. to contact

you regarding a change of event location or cancellation. Any transfers of your data overseas (outside of the European Union), for example to the University of Strathclyde USA Foundation, as set out above, are protected either by an 'adequacy decision' by the European Commission (declaring the recipient country as a 'safe' territory for personal data) or by standard contractual clauses adopted by the European Commission (which give obligations for the recipient to safeguard the data).

5. Communicating with you

We want to communicate with you in a way that meets your needs and requests. Communications may be sent by post, telephone or electronic means, depending on the preferences you have indicated. You have the right to choose not to receive these communications at any time, and clear and unambiguous opportunities to do so are included with all communications. If you wish to alter how you receive communications or you wish to stop receiving communications altogether, you can change your preferences via [Strathclyde Online](#) (for registered users), click on the relevant link at the bottom of any email, or contact the Alumni & Development Office by any of the contact methods listed in section 9.

Please note that where you have given consent for us to phone you, this overrides any registration you may have made with the Telephone Preference Service.

6. How we protect your data

Your personal data will be managed securely. Access will be restricted to only those staff or authorised agents who require it and on a 'need to know' basis. The University will employ any technical and organisational measures necessary to ensure the security of your data. You can find more information about our [Information Security policies](#) on our website.

We also work with carefully selected partners who carry out work on our behalf. These partners will be acting on behalf of the University, for the purposes set out in this privacy notice or for purposes approved by you e.g. alumni database supplier or mailing houses.

Partners working on behalf of the University will never use your data for non-Strathclyde purposes.

Fundraising is a key part of our work, and we are committed to working in a transparent, ethical, responsible and honest way. We are signatories to the Scottish Fundraising Standards Panel [Fundraising Guarantee](#). We will also always abide by our [Supporter Promise](#).

7. Strathclyde Online Communities

[Strathclyde Online](#) is a service provided free of charge for University of Strathclyde alumni. Users can view and amend their contact details held by the Alumni & Development Office and update their communication preferences. Users are subject to this Privacy Notice and the additional terms and conditions in the Privacy Policy at www.alumni.strath.ac.uk/privacy_policy.

Strathclyde Online which processes donations and event registrations is fully [PCI-DSS](#) compliant. We do not store any paper credit/debit card details after the transaction has

been processed. Direct Debits are processed in line with the [Direct Debit Guarantee](#) scheme.

Blackbaud Inc., a US based company, are the software providers for the alumni and supporter database: The Raiser's Edge. Strathclyde Online and our peer-to-peer fundraising platform EverydayHero are also supplied by Blackbaud Inc. Blackbaud Inc. have undertaken to comply with the principles of data protection legislation, and the Privacy and Electronic Communications (EC Directive) Regulations 2003. Blackbaud Inc. is a member of the EU-US Privacy Shield framework, further details of which can be found at <https://www.privacyshield.gov/welcome>.

Digital tools may be used to monitor the impact of our communications and improve the effectiveness of the University's communications, such as email tracking to record when an email is opened and which links are clicked within a message. We monitor website visits and use tools such as Google Analytics to improve our website and services.

8. Your rights and changes to this policy

Depending on the lawful basis for processing, you may have the right to:

- be informed as to how we use your data (via this Privacy Notice);
- find out what personal data we process about you and obtain a copy of the data, free of charge within one month of your request. We may make a charge for additional copies of the same information;
- ask us to correct inaccurate or incomplete data;
- update, amend or rectify the contact information we hold about you by registering at www.alumni.strath.ac.uk/update;
- change your communication preferences at any time to restrict how we process your data, or opt out of some or all communication from the Alumni & Development Office
- ask us to remove your data from our records (though some may be retained - see section 3)
- withdraw consent to process your personal data at any time, where it is used as a lawful basis for processing;
- object to, restrict the processing of, or request erasure of your information for any of the purposes outlined above;
- lodge a complaint with the Information Commissioner's Office at <http://ico.org.uk/concerns>

You can amend the information we hold about you, or your mailing preferences, at any time by calling +44(0)141 548 2773, or emailing alumniweb@strath.ac.uk (full contact details in section 9).

If you have any queries, wish to restrict data processing or sharing including use for marketing, or do not want to be contacted by the Alumni & Development Office, please contact us.

Please see <http://www.strath.ac.uk/dataprotection/accessingyourpersonaldata/> or contact dataprotection@strath.ac.uk for further information on the University's policies in relation to Data Protection.

Our Data Protection Officer is responsible for monitoring compliance with data protection legislation and can be contacted at dataprotection@strath.ac.uk .

We will publish any changes we make to this data protection policy on our website www.strath.ac.uk/alumni/.

If you wish to enquire about Alumni & Development Services, this Privacy Notice or Strathclyde Online, please contact alumniweb@strath.ac.uk.

9. Contact us

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