

Alumni, Donors and Supporters Privacy Notice

1. Introduction

This privacy notice outlines the types of information that we hold and how we use it to provide services to our alumni and supporters. The University of Hertfordshire Higher Education Corporation (the 'University') is the Data Controller and is responsible for, and controls, the processing of, your Personal Data. The University is registered with the Information Commissioner's Office (ICO), with the reference number Z5759523.

The University is committed to maintaining the privacy and security of your personal data in line with data protection legislation, namely the UK General Data Protection Regulation (UK GDPR), the Data Protection Act (DPA) 2018, and the Privacy and Electronic Communications Regulation (PECR).

This Privacy Notice explains how your personal data will be processed (i.e., collected, used, shared and protected etc.). It is important that you read this Notice so that you are aware of how and why your personal data will be used. This notice should be read in conjunction with the University's main Data Protection Policy and Privacy Statement, UPR IM08, and its appendices (IM08-Data-Protection.pdf (herts.ac.uk))

If you have any questions about this Privacy Notice, you can contact the University by emailing the Data Protection Officer (DPO) at dataprotection@herts.ac.uk

2. What data will be collected, how your personal data will be used, and what lawful basis applies

Your personal data will be collected and processed for a number of related reasons and will only be used when the law allows (i.e., where there is a lawful basis as defined by the data protection legislation).

2.1. What data is processed

We may process information relating to you which derives from a number of different sources. The majority of the information we hold on alumni is information which you provide to us (for example, you may give us information by filling in forms on the University's website, or by contacting us by telephone, email or otherwise). If you are a student or you studied at the University, affiliated or predecessor institution, some of your personal data is transferred from your student record to the University's Development and Alumni database (known as "Salesforce"). The data may contain personal details which you have disclosed to us or information from publicly available sources.

The types of data we may process on you, depending on your engagement with us, includes:

- name, title, gender, nationality (as provided to the University) 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 occupation and professional activities
- your recreations and interests

- family and spouse/partner details and your relationships to other alumni, supporters, friends and associates
- records of donations and Gift Aid status, where applicable (as required by HMRC)
- records of communications sent to or by you
- volunteering by you on behalf of the University
- information about your wealth
- information about your propensity to support the University and/or receptiveness to certain kinds of communication or engagement
- information about your relationship with the University
- media articles about you
- information on your engagement in University meetings, events, groups or networks
- information about your use of University resources or facilities (for example career and employment services).

2.2. How your data will be used

We will process your personal data for the purposes of engaging you in the following University activities, which we may carry out by mail, email, telephone and social media:

- sending University publications and communications (for example alumni newsletters)
- conducting surveys
- providing services, including access to University facilities
- sending you tailored proposals, appeals and requests for donations
- sending you details of volunteering opportunities
- inviting you to alumni and other University events
- the promotion of other opportunities and services available to you (e.g. offers and opportunities available through your Herts alumni network)
- wealth analysis and research (see section 2.3. below)
- sending you updates on the use of donations
- Social media advertising
- internal record keeping, including the management of any feedback or complaints;
- administrative purposes (e.g. in order to process a donation you have made or to administer an event you have registered for or attended).

2.3. Wealth screening

We may also use your data to carry out research (sometimes known as ‘prospect research’ or ‘wealth screening’) to help us understand the giving capacity of our alumni and potential supporters. This research enables us to improve our understanding of our alumni and

supporters, inform our fundraising strategy, target our communications more effectively, and maintain good practice.

We may use publicly available information, recommendations from staff, supporters and specialist third party services to identify individuals and organisations who we believe may have the interest and financial capacity to make a major gift to the University. Where third parties are used, they collate and review publicly available information – including directorships, property ownership, familial links, news coverage, and philanthropic activity – to give an indication of the financial giving capacity of individuals.

We only undertake this activity where we believe we have a legitimate interest in doing so, and we take care to balance this with your rights and freedoms. When we share your data with a service provider, we only share the minimum amount of information required to fulfil the task and through secure means. The data is not kept once the processing is complete and our third-party service providers are not allowed to use it for their own purposes.

You have the right to object to your data being used in this way at any time. To do so, please contact us at development@herts.ac.uk

2.4. Graduate Outcomes

The University of Hertfordshire is required by the Higher Education Statistics Agency (HESA), to supply the details of all new graduates for the purpose of delivering the national Graduate Outcomes Survey which is sent 15 months after study completion. Graduates can opt-out of taking part in the survey by emailing HESA directly at info@graduateoutcomes.ac.uk

2.5. The lawful basis for processing your data

We rely on the lawful basis of legitimate interests for data processing for these activities wherever appropriate and possible. We can do this where we consider the processing is necessary to meet our legitimate interests because it:

- is of clear benefit to the University and those who we can support because of this activity, i.e. through teaching, research and in society more broadly;
- has a limited impact on the privacy of students, alumni, staff and current and potential supporters, whose interests do not override our legitimate interests and the wider public interest;
- it is reasonably expected by our students, alumni, staff and current and potential supporters

Where we are required by law to process data or to meet a legal obligation, e.g. the Higher Education Statistics Agency (HESA) to conduct the Graduate Outcomes survey, we rely on the lawful basis of legal obligation.

3. Sharing your information with third parties

The University may share personal data with other data processors where it regards such sharing to be in its legitimate interests. On occasion we may share your data with a mailing house (subject to an appropriate data sharing agreement) for the purpose of sending you printed materials in the post.

Where your data may be used for social media advertising, this data is hashed as standard and is therefore not identifiable to the social media platform providers themselves. More

information on when your data may be shared, along with a list of third parties we may share with, can be found [here](#). Where necessary there will be appropriate data sharing arrangements in place with any third party providers with whom your data is shared.

4. Sharing and processing personal data outside the UK and EEA

Personal data can only be transferred out of the UK and EEA when there are safeguards in place to ensure an adequate level of protection for the data, such as where a country has received an 'adequacy decision' for their level of data protection from the EU Commission. There are certain limited circumstances in which your personal data will be shared with third parties outside the UK and EEA, which may include:

- where a third-party service provider uses servers outside the UK or EEA;

In such circumstances, any transfer of personal data outside the UK or EEA will be subject to appropriate safeguards such as strict contractual arrangements, incorporating appropriate clauses that meet the requirements of data protection legislation.

5. The security of your personal data

Appropriate organisational and technical security measures have been put in place to protect your personal data from a data breach, i.e., accidental, or unlawful destruction, loss, alteration, and unauthorised disclosure or access. We hold Cyber Essentials certification.

Access to your personal information is limited to those employees, service providers, business partners, agents and other third parties who have a legitimate need to know. They will only process your personal information on the instructions of the University or as otherwise agreed, and they are subject to a duty of confidentiality.

Procedures are in place for dealing with any suspected data security breach and you will be notified, as will any applicable regulator of a suspected breach, where there is a legal obligation to do so.

6. Storage and retention of your personal data

The University of Hertfordshire maintains a record of all former students and, as such, we hold education details in perpetuity. Other information will be reviewed according to the University's [records retention schedule](#) and deleted if the criteria for retention are no longer met.

7. Your data subject rights

Under certain circumstances, by law, you have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data held about you.
- Request correction of any personal data held about you.
- Request erasure of your personal data where there is no good reason for us continuing to process it.
- Object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party), including where the processing of your personal information is for direct marketing purposes.

- Request the restriction of processing of your personal data. You can ask for processing of your data to be suspended where you might, for example, want to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to another party.

Please note that the above rights are not absolute, and requests may be refused where exceptions apply.

If you want to fulfil any of these rights please contact dataprotection@herts.ac.uk. You can also find further information as to how we will deal with any data subject rights requests here: [Data-Subjects-Rights.pdf](#)

8. Changes to this Privacy Notice

This Privacy Notice will be updated from time to time to reflect changes to the legislation and data processing. Please check this notice for future updates. You may also be notified in other ways, from time to time, about the processing of your personal information.

9. Contact and complaints

Please contact dpcomplaints@herts.ac.uk in the first instance if you have any queries or complaints about the way your data, or fulfilment of your rights, has been handled, and we will make every attempt to deal with your concerns.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).