



CLARE COLLEGE
UNIVERSITY OF CAMBRIDGE

Data Protection Statement

How we use your personal information

Alumni and other supporters

This statement explains how the College ('we' and 'our') handles and uses data we collect about alumni and other supporters ('you' and 'your'). 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, including 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 indefinitely or until you request us to do otherwise. When changes are made to this statement, we will publish the updated version to our website and notify you by other communications channels as we deem appropriate or necessary.

The controller for your personal data is Clare College, Trinity Lane, Cambridge, CB2 1TL. The person responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data, is the Assistant Bursar, Miss Emma Easterbrook, dataprotection@clare.cam.ac.uk

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.

How your data is used by the College

We collect and process your personal data, as specified below, for a number of purposes, including:

- A. Achievements of the College and the University of Cambridge and elsewhere;
- B. Retaining a formal record of your academic, career 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;

- C. Engaging 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;
- D. Providing 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;
- E. Encouraging you to make a financial contribution to the College and/or the University, and processing any such contributions;
- F. Assessing the likelihood that you will, now or in the future, make a financial contribution (gift) to the College; and
- G. Promoting third party services we believe will be of interest to you.

Further details are provided in the Annex. If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address given below.

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, development@clare.cam.ac.uk. You may request changes at any time.

How we share your personal data

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.

The University and its partners (including the College) have a data sharing agreement 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 College and the University may share any of the above categories of personal data with the University, as outlined in the [University and Colleges Student Data Sharing Protocol](#). 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: additionally, we 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 US);
- Volunteer partners closely related to us (e.g. College trustees, development board members, alumni group representatives);
- Contractors providing services to you on our behalf e.g. contractors for our annual Telethon Campaign (our "data processors"), as outlined above;
- Third party agencies who provide us with data in the public domain about alumni and supporters, as outlined above; and
- Selected companies who provide College-branded or College-endorsed products and services, as outlined above.

We also facilitate communication between individual alumni (of the College and/or the University), but in doing so we do not release personal contact details without prior permission.

Any transfers of your data overseas or to international organisations, as set out above, are protected either by an adequacy decision by the European Commission or by standard data protection clauses adopted by the European Commission (which are available from our Data Protection Lead) or, before 25 May 2018, by a self-assessment of adequacy.

We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them.

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 communications or direct marketing; 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 you opt out of all future communications or 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, while still maintaining our record of your academic achievements. We may also need to retain some financial records about you for statutory purposes (eg Gift Aid, anti-fraud and accounting matters).

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

ANNEX

We collect and process your personal data, as specified below, for a number of purposes, including:

A. Maintaining a formal 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:

- (i) Your current name and any previous names you have had;
- (ii) Unique personal identifiers (eg student number, CRSID, date of birth, photograph);
- (iii) Your current and previous contact details;
- (iv) Your application details, our assessment of your application and the details of any offer(s) of study we have made;
- (v) Records of your academic provision from the College (including supervisions, College examinations and other academic support);
- (vi) Matriculation and graduation details and records of your academic qualifications (including those prior to becoming a member of the College); and
- (vii) Other details of your academic progress or achievement (e.g. College or University awards or prizes).

B. Retaining a formal record of your academic, career 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:

- (i) Details of your achievements since you completed your course(s) of study;
- (ii) Membership of College and external clubs and societies (including alumni groups); and
- (iii) 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 will assume (unless you notify us otherwise) that we can promote these achievements in our public literature, and can use this information for other purposes outlined in this statement. We may supplement information from other public sources that we consider to be reliable (e.g. your public social media profile(s), Queen's Honours List, Companies House, high profile news reports or articles) and may check their accuracy with you from time to time.

C. Engaging 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:

We retain personal data (provided by you or by the University of Cambridge, or created by us), including:

- (i) Known relationships with other members (past or present) of the University of Cambridge or any of the Colleges;
- (ii) Your previous attendance at College or University events;
- (iii) Information about your areas of personal interest;
- (iv) Personal data relating to your attendance at events and your personal preferences (eg dietary or accommodation requirements or requests); and
- (v) 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 will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement. We may supplement information from other public sources that we consider to be reliable (eg 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.

D. Providing 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:

We retain personal data (provided by you or by the University of Cambridge, or created by us), including:

- (i) Any communication preferences confirmed by you; and
- (ii) Ways in which you have supported the College.

By providing us with email addresses and telephone numbers, we have taken this to be consent to use those channels to contact you for this and other purposes outlined in this statement, unless you have outlined to us your preferred communication channels. When you provide this information, we will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement.

E. Encouraging you to make a financial contribution to the College and/or the University, and processing any such contributions:

The College's income consists of gifts and benefactions, income derived from prudent investment of any endowment and student fees. We value any financial contribution from our members and, accordingly, retain personal data (provided by you or by the University of Cambridge, or created by us), including:

- (i) The purposes and amounts of any donations or other support previously provided to the University or the College by you;
- (ii) The method(s) of payments used and related payment references;
- (iii) Your bank details (for processing direct debit or other financial transactions); and
- (iv) Your tax status and Gift Aid declaration.

Some of this financial information needs to be retained for statutory purposes for a number of years (eg Gift Aid, anti-fraud and accounting matters). When you provide this information, we will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement.

F. Assessing the likelihood that you will, now or in the future, make a financial contribution (gift) to the College:

The College undertakes research to determine your capacity to provide financial support. This results in us creating personal data including:

- (i) Your estimated income or asset worth (where this is not provided by you);
- (ii) 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*; and
- (iii) *Gifts you have made to other charitable organisations.*

Our research includes incorporating information from public sources that we consider to be reliable (eg your public social media profile(s), Queen's Honours List, Companies House, high profile news reports or articles). In using these sources, we have considered the potential intrusion of 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.

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. We do not sell your personal data under any circumstances.

G. Promoting third party services we believe will be of interest to you:

We retain personal data (provided by you), including:

- (i) Any preferences to be excluded from such services.

If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us.

This Data Protection Statement was last revised and adopted by the Council on 22 January 2018.