

## **Alumni Privacy Notice**

### **Purpose of this Notice**

This Notice explains how the University through its Alumni and [Communications, Marketing, Recruitment and Admissions](#) team, Departments and Schools will collect and use your personal data for alumni and development activities.

Please see below more information on the alumni activities covered by this Notice.

Throughout this Notice, "University" "we", "our" and "us" refers to Glyndwr University. "you" and "your" refers to University alumni, together with other individuals involved in alumni and development activity.

We are the data controller for personal data that we process about you.

This Notice complies with requirements under both Data Protection Act 2018 and General Data Protection Regulations 2016.

### **Changes to this Notice**

Prior to the implementation of GDPR, we are likely to make changes to this Notice. We shall inform you of any changes to this Notice.

You can obtain the current version of this Notice from <https://www.glyndwr.ac.uk/en/studentsupport/alumni/join>

### **Anything you are not clear about**

If there is anything you are unclear about, please contact our Data Protection Officer, who shall be happy to answer any queries you may have concerning this Notice or the way in which we process your personal data [dpo@glyndwr.ac.uk](mailto:dpo@glyndwr.ac.uk)

The Data Protection Officer's contact details are provided at the end of this Notice.

### **The University's commitment to alumni**

Where you are a student of the University you automatically become a member of the University and normally become a member of the University alumni community. The University promises to provide alumni services to University alumni and this promise is now part of the

student contract. The University regards these services as an important and integral part of the University's long term commitment to its students.

Please visit <http://www.glyndwr.ac.uk/en/studentsupport/alumni> for more information.

### **Where does the University get your personal data from?**

We obtain personal data regarding you from the following sources:

#### The University

- via a transfer from the University's student central and local databases (if you were a student) to the alumni database upon graduation

#### Data you provided when you:

- registered for Glyndŵr Alumni Online
- provided information through one of our websites for example via Moodle, newsletter competitions, volunteering discussions or donations
- completed and returned surveys or response forms such as contact preference forms, Gift Aid forms (by mail, email or via a University website)
- discussed it with University representatives (for example, with our Registry team)
- registered to attend an alumni related event

#### Third party sources

- from third party sources such as organisations that assist us with pursuing our purposes described below, media articles, company and, charity filings or social networking posts or other public sources for example the world wide web.

As with most websites certain actions you take will be recorded anonymously as cookies by the University's websites. Please see the Alumni website for further information on <https://www.glyndwr.ac.uk/en/disclaimer/>

## **The purposes for which we process your personal data**

We will use your data to help us maintain an engaged alumni community. Please see the Alumni website for further information on <https://www.glyndwr.ac.uk/en/disclaimer/>

We may also process your personal data for the following purposes:

### Administration

- to verify an account and provide a personalised experience for you when you register for the Glyndŵr Alumni Online website
- to process a gift you have given (and any Gift Aid claims)
- event registration
- to keep a record of communications between you and us

### Reunions

On occasion members of the alumni community may host reunions. To help the organiser establish who to invite the University provides some information.

The University provides organisers with details of alumni from a selected year group and course, as requested by the organiser. Details provided include first name and surname (as it appears on the University's alumni database), degree, course and year of graduation. Details usually indicates who the University is in contact with and who is deceased.

If you prefer for us not to conduct the above activities please email [alumni@glyndwr.ac.uk](mailto:alumni@glyndwr.ac.uk)

### Visiting Campus – Track and Trace and Protect

In order to best respond to our legal responsibilities under Public Health, it is necessary for the University to collect personal details about you as a visitor to our campus. You are providing this information for a specific reason and we will be processing this information in order to protect your vital interests (Article 6(1)(d)) and for the performance of a public task as it allows the University to comply with our legal responsibilities around public health (Article 6(1)(e)). The collection of this information is necessary to ensure your safety and well-being at visiting the campus, in accordance with Welsh Government guidance, to manage and enable us to effectively keep you safe. The information on the form will be retained for no longer than three weeks and will be kept secure and destroyed using our confidential waste process.

Where required, your contact details and special category information (health) to be shared with organisations to manage and mitigate the spread and impact of the current outbreak of coronavirus (COVID-19) risks to public health (e.g. Track and Trace and Protect). Article 9 (2) (c) processing "special categories" of data is necessary in order to protect the vital interests of the data subject or of another natural person – by sharing contact details of person (s) with symptoms of ill health (e.g. Covid-19 symptoms) which maybe the data subject or another natural person that they may have come into contact with on University premises and may

have underlying health conditions. Article 9(2)(g) – substantial public interest and DPA 2018 Schedule 1 Part 2 para 6 (Statutory and government Purposes) Article 9 (2) (i) public health purposes and DPA 2018 – Schedule 1 Part 1 para 3 Public Health.

### Profiling and planning

We use your data (such as your postcode, subject of study, age, gender and level of engagement with the University) to help us plan our activities, and determine if we should contact you with certain communications, or information about particular activities. It helps us identify how our alumni are involved with the University, and which alumni activities are most popular. This research helps ensure our communications (including fundraising or volunteering requests) are relevant and of interest to you.

If you prefer for us not to conduct the above activity please email [alumni@glyndwr.ac.uk](mailto:alumni@glyndwr.ac.uk)

### **Anonymised data**

Your data may when, anonymised and no longer constituting personal data, be used to support alumni activities.

### **Keeping your data up to date**

We will update the data we hold on you from time to time. For example, if you provide us with new contact details or change your details on websites managed by the University such as [Wrexham Glyndŵr Alumni](#) or social media sites such as facebook or LinkedIn. We will respond to your request for your data to be updated.

If you would like your data to be updated please either email [alumni@glyndwr.ac.uk](mailto:alumni@glyndwr.ac.uk)

### **Who can see your data?**

Your data is held securely within the University. Access is strictly controlled and staff receive training on data protection.

In addition to third parties helping us keep your data up to date, in order to boost functionality and efficiency, we may employ IT experts from outside of the University to aid with the development of our systems. They may have access to information which is necessary to complete the specific task for which they are appointed. These experts will provide their services in accordance with the strict instructions of the University. In particular they must respect confidentiality and to the extent they do need to temporarily hold any data, that data must be held securely, strictly used only for the agreed purpose, kept for only as long as necessary and then destroyed.

We will not sell or share your data to third parties for their commercial purposes.

### **Higher Education Statistics Agency**

All UK universities are obliged to give contact details of recent graduates to HESA (The Higher Education Statistics Agency) in order to conduct a survey of graduate destinations.

- Graduates who finished their studies from August 2017 onward will be contacted 15 months after graduation to complete the “Graduate Outcomes” survey. See <https://www.hesa.ac.uk/about/regulation/data-protection/notices>).

These surveys help to inform government policy. They are also used in calculations for university league tables and by the universities themselves to assess the longer-term impact of the student experience. The data is provided to HESA strictly and solely for this purpose. All recent graduates to whom this applies will be given the option to opt out of the survey when they are first contacted.

### **Communications**

We will from time to time communicate with you by email to pursue the purposes mentioned above. In particular we regularly communicate with people for the following purposes:

- share news about the University (including its research and services) and our alumni (including promotion of discounts and services for alumni)
- invite you to events and reunions
- invite you to volunteer for the University. This includes providing advice and guidance to students and University representatives and giving support to students during their time at University and in their career.

If you prefer not to have your personal data used for any or all of the above purposes, please email [alumni@glyndwr.ac.uk](mailto:alumni@glyndwr.ac.uk)

If you are unsuccessful in unsubscribing from our communications and/or remain concerned, please contact our Data Protection Officer (see later contact details).

### **Retention**

We see being a member of the University and part of the alumni community as a lifelong relationship. Generally, the University will look to retain University alumni personal data until the individual asks us to remove it from our records. We will routinely remind you of your right to have us remove your personal data.

If you decide that you no longer wish to receive communication from the University please be aware that we still need to retain a minimal amount of personal data so that we can keep a record that you have asked us not to contact you.

If you are not a member of the University alumni community, any personal data held 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.

### **Your rights as a data subject**

Under GDPR you have the right to:

- withdraw consent where that is the legal basis of our processing
- access your personal data that we process
- rectify inaccuracies in personal data that we hold about you
- be forgotten, that is your details to be removed from systems that we use to process your personal data
- restrict the processing in certain ways
- obtain a copy of your data in a commonly used electronic form; and
- object to certain processing of your personal data by us

Please see <https://ico.org.uk> for further information on the above rights. You may also contact the Data Protection Officer for further information.

You have a right to complain to the Information Commissioner's Office about the way in which we process your personal data. Please see <https://ico.org.uk>.

### **Legal basis for processing your data under GDPR**

GDPR is a new law and it has not yet been applied to circumstances similar in context to our relationship alumni. The extent of lawful grounds for processing data has yet to be fully understood, however, the University will process your information based on your consent. As legal views mature the University may change its views on its legal basis for processing.

The University has made a contractual commitment to students, as lifetime members of the University, to provide services and activities for alumni. Therefore, the University will also be processing data often on the basis that it is necessary to enable it to meet its contractual commitments to alumni.

The University believes that by supporting University alumni and other development activities it is conducting something in the public interest. In particular it is supporting the University's charitable object of education and the benefits to society that flow from that.

Sometimes the University will be processing your data because you have clearly made it publicly available.

Finally, the University believes that its activities are necessary for the purposes of the legitimate interest of the University and other third parties. These interests are not overridden by the interests and fundamental rights or the freedoms of the data subjects concerned. Legitimate interests of the University and third parties focus around supporting educational activities and ongoing developmental activities for University alumni and others.

It is recognised that some of the above grounds will overlap and that the University could rely on multiple grounds justifying its lawful processing.

### **Concerns and contact details**

If you have any concerns with regard to the way your personal data is being processed or have a query with regard to this Notice, please contact our Data Protection Officer, at [dpo@glyndwr.ac.uk](mailto:dpo@glyndwr.ac.uk)

Our general postal address is [Wrexham](#) Glyndŵr University of Mold Road Wrexham LL11 2AW, UK.

Our data controller registration number provided by the Information Commissioner's Office is **Z5199192**

<b>Reviewed</b> August 2020	<b>Author:</b> Leonna Messiter	<b>Additions:</b> Relate to the collection of personal data and when required, sharing of personal data to a third party (includes special category – relating to health) for Track, Trace and Protect purposes.
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