

Linacre College Privacy Notice – Alumni, Donors and Supporters

1. Introduction

Throughout its history, Linacre College members have been grateful to alumni and other supporters to help realise its mission of providing a welcoming social, pastoral, and academic community for our students from over 130 countries.

Linacre's Development and Alumni Relations team exists to establish and develop lifelong relationships with and amongst our alumni, donors, and supporters (our 'Supporters'). We're here to help you stay connected with each other, and with Linacre.

We are committed to maintaining your confidence and trust with respect to your privacy and to being transparent about what data we are collecting about you, where that data comes from, how we use it, and the choices you can make.

If at any point you have questions about our privacy notice, or how we are using your data, please get in touch with us using the contact details below.

2. About this privacy notice

The purpose of this privacy notice is to explain why we hold and use personal data about our Supporters, and how we use it for Supporter relations and fundraising purposes. 'Personal data' is personal information relating to you from which you can be identified that we collect or which you provide.

Linacre's privacy notices relating to its processing of personal data in relation to other individuals (such as current students) and/or its other activities will be provided to you separately.

3. Information we collect

The personal data we collect and hold about you depends on the frequency and nature of your interactions and engagement with us. Information may be gathered across the lifetime of our relationship with you and from many different forms of interaction.

We collect information: directly from you during your ongoing relationship with us or with the University of Oxford; from other Supporters; from publicly available sources; and/or from third parties providing us with services or acting on our behalf. We may hold and process the following types of personal data:

Biographical information, which may include:

- name, title, contact details, date of birth, gender, marital status, spouse, partner and family details
- for alumni: student ID, programme of study, department, college, matriculation or start date, graduation date, degree conferred
- awards received whilst studying at Oxford; other education history and professional qualifications
- involvement in sports teams, clubs and societies whilst at Oxford and subsequently
- employment details, career history, professional activities
- interests, activities and accolades, incl. honours, life achievements
- profile pictures which come from publicly accessible sources
- links to your public social media presence e.g. LinkedIn, Twitter, website or blog

Details of our ongoing relationship and your engagement with us, which may include:

- records of communications you have received and your interactions with our Development and Alumni Relations team
- your communication preferences
- data obtained through cookies and similar technologies such as pixels, tags, web beacons, and other identifiers (you will find a link to the relevant cookie policy on each of our websites)

- your attendance (and that of your guests) on visits to, or at events, at Linacre
- photographs, audio and video recordings, taken at visits or events
- your connections to other Supporters, students, staff, friends, groups or networks, patrons groups, trusts, foundations and corporate donors associated with, or within, the Linacre community
- membership of college social media groups e.g. Facebook, LinkedIn
- a record of offers of voluntary support you have made, e.g. offers of expertise, advice, mentoring, internships, coaching, accommodation/support for students visiting your area, and work undertaken
- current and past donations and pledges, documentation relating to the same, along with records of the projects you have supported
- financial information required to process your payments (e.g. for events) and/or gifts (N.B. card details are always destroyed after completion of transactions)
- if you have given it, an indication of your intent to leave a legacy, including copies of Wills or sections of Wills
- any requests you have made for anonymity in relation to your giving

Information relating to your willingness or financial capacity to support our charitable objectives, which may include:

- Our understanding of your likely philanthropic interests, and a note of particular projects we think may be of interest to you.
- Information about your giving to other organisations, and other support that you provide (e.g. volunteering roles, trusteeships), where this information is given to us by you or publicly reported, and where it helps us to understand your interests and capacity to provide support
- Other information which may give an indication of the scale of any potential philanthropic gift you may be able to give, such as information about earnings and assets, including property, or publicly reported estimates of wealth
- Information required for donor due diligence purposes

Sensitive personal data, which may collect includes:

- **Health information, including any medical conditions** - we may use health information provided by you so we can make reasonable adjustments to improve the service we are able to offer you. With your permission, we may also hold health data to ensure our engagement with you is based on a suitable understanding of, and care and respect for, your particular circumstances.
- Personal data **regarding criminal convictions, offences and allegations of criminal activity** will only be processed if required by donor due diligence procedures.

4. How we use your data

Your personal data is used by us for the following purposes:

- To manage our ongoing relationship with you which may include:
 - offering and managing a varied programme of events tailored to your interests, including networking events, reunions, Gaudy dinners, sports events, concerts, seminars and lectures;
 - ensuring your requirements at events are met e.g. seating or access at an event, dietary requirements, provision of disabled parking, or allocation of accommodation
 - keeping you up to date with news from Linacre
 - providing you with information about alumni benefits and services, including access to the University of Oxford Careers Service
 - letting you know of volunteering opportunities at Linacre e.g. linking current students with alumni for careers advice and internships, or speaking opportunities
 - creating classifications and groupings (through manual or automated analyses) in order to best direct engagement activities
- To keep a record of your interactions and contributions to college and University life
- To complete transactions e.g. the purchase of event tickets

- To review and assess the efficiency, effectiveness and success of our engagement and fundraising efforts, including collecting feedback and managing complaints
- To ask you for your support for our fundraising programmes
- To provide acknowledgement, recognition and stewardship of a gift and inform you of the impact of a gift
- Where we have reason to think a potential donor may possess an interest and financial capacity to donate, we may research and collate additional information from sources in the public domain, typically concerning a potential donor's interests in so far as they may coincide with our work, their philanthropic activity, financial capacity and networks in order to substantiate this. We may undertake this research ourselves or use the services of a third-party partner. This new information may be added to the record of a donor or potential donor.
- We may also carry out due diligence on potential donors using publicly available information in order to comply with our policy on the acceptance of gifts, and to fulfil our legal responsibilities.
- We may use your personal data for the purposes of operational reporting, to produce management information, and for other relevant purposes relating to the governance of the collegiate University.
- With your permission, we may publish your name in an online directory, in donor listings, as part of a guest list, or we may work with you to create press releases or case studies to be included in our publications or on our websites.

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. The legal basis for processing your data

We rely on the following legal bases for processing your personal data:

- For our **legitimate interests** or those of a third party including interests in being able to provide information and services to our Supporters, administer our contact database, analyse our contact database, get to know our Supporters preferences, send marketing to promote our activities and fundraising efforts, plan marketing and other communications, plan and run events, and maintain records relating to our activities and fundraising. We will always seek to pursue these legitimate interests in a way that does not unduly infringe on your other legal rights and freedoms and, in particular, your right of privacy;
- Where we need to **perform the contract** we have entered into with you, or in order to take any pre-contract steps at your request;
- Where we are required to collect, process or hold your personal data to comply with a **legal obligation**;
- Where you have provided your specific, informed and unambiguous **consent**; or
- Where we need to protect your **vital interests** or those of someone else (such as in a medical emergency).

6. When and how we share your data

We may, from time to time, need to share your personal data outside the College, as set out below. We will only do this in appropriate circumstances, by secure means, and with the relevant data sharing agreements in place. We do not, and will not, sell your data.

Whenever your information is shared, we will always seek to share the minimum amount of personal data necessary to fulfil the purpose, and will share only anonymised or pseudonymised data where that is sufficient.

Third party service providers will only process your personal data on our instructions, for specified purposes and observing appropriate security measures to protect your personal data in line with our

policies. We do not allow third party service providers to use your personal data for their own purposes nor to keep your data after they finished providing their services.

Your personal data may also be shared with the following:

- Colleges and departments that make up the collegiate University where it is necessary in order to carry out any of the purposes listed in this privacy notice, e.g. where the University is working with one or more colleges to organise shared events to which you are invited.
- College or University Sports Clubs and Societies of which you are (or were) a member.
- Selected organisations and individuals who volunteer to support Linacre. We may share relevant data with them, in limited circumstances, e.g. Linacre Societies and Networks, when they are helping to organise a dinner or host an event to which you are invited.
- The following organisations which enable tax-efficient giving to Linacre, from outside of the UK. Data may be shared by us with these organisations where it relates specifically to donations you have made, or have pledged to donate via these organisations.
 - **Americans for Oxford, Inc. (AFO)** accepts gifts in support of the collegiate University of Oxford, and therefore of Linacre College. AFO has been determined by the United States Internal Revenue Service to be a tax-exempt public charity. The personal data you provide when making a gift to AFO are collected and processed by Oxford University's North American Office using the shared Development and Alumni Relations System (DARS).
 - **Swiss Friends of Oxford (SFOU)** Swiss residents can give tax efficiently to the collegiate University of Oxford, and therefore to Linacre College. SFOU is set up as an association (Verein) under Swiss law and has a tax ruling from the canton of Zug recognising its tax-exempt status.
 - **German Friends of Oxford University** Residents of Germany can also make tax-efficient donations to the collegiate University of Oxford, and therefore to Linacre College, via the German Friends of Oxford University without incurring any fees.

The third party data controllers external to us with whom we deal as described above will handle your personal data in accordance with their own chosen procedures and you should check the relevant privacy notices of these organisations to understand how they may use your personal data. Since these controller organisations are acting outside of our control, we have no responsibility for their data processing practices.

7. How we protect your data

Linacre College takes precautions to safeguard your personal data against loss, theft and misuse, unauthorized access, disclosure and destruction through the use of appropriate administrative, physical and technical security measures.

Transfers of your data outside of the European Economic Area (EEA) - although most of the information we collect, store and process stays within the UK, some information may be transferred to countries outside of the European Economic Area (EEA), e.g. if a service provider's servers are located in a country outside of the EEA.

However, in order to safeguard your personal data, we only conduct such a transfer under a contract or another appropriate mechanism which is authorised under data protection law. This is to make sure that your personal data is safeguarded in accordance with the same legal standards that apply to us in the United Kingdom.

8. How long we keep your data

Linacre College will retain the personal data of Supporters for as long as necessary for use in line with the purposes set out in this privacy notice. E.g. if you have pledged a legacy gift, and informed us of it, it will be necessary to retain that information until your gift is received. When determining how long we should retain certain personal data we take into consideration our legal obligations and tax or accounting rules. When we no longer need to retain personal data, we ensure it is securely disposed of. We may keep anonymised statistical data indefinitely, but you cannot be identified from such data.

9. Applicable law

We collect and process your personal data in accordance with applicable law. This includes, without limitation, the EU General Data Protection Regulation (2016/679) and the UK Data Protection Act 2018 together with other applicable UK and EU laws that regulate the collection, processing and privacy of your personal data.

9. Your legal rights and choices in connection with your personal data

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

- **Request access to your personal data** (commonly known as a “subject access request”). This enables you to receive a copy of your data and to check that we are lawfully processing it.
- **Request correction of your data.** This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- **Request erasure of your data.** This enables you to ask us to delete or remove your data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).
- **Object to processing of your data.** In certain circumstances, you will be entitled to object to processing on this ground, e.g. you have the right to object where we are processing your data for direct marketing purposes (you also have the right to opt out of receiving promotional communications at any time by using the ‘unsubscribe’ link in emails).
- **Request the restriction of processing of your data.** This enables you to ask us to suspend the processing of your data, e.g. if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your data to another party.**

Depending on the circumstances and the nature of your request it may not be possible for us to do what you have asked, e.g. where there is a statutory or contractual requirement for us to process your personal data and it would not be possible to fulfil our legal obligations if we were to stop.

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your personal data, please contact the Data Protection Officer, Linacre College, St Cross Road, Oxford OX1 3JA or at dpo@linacre.ox.ac.uk. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of data protection law.

If you remain dissatisfied, you have the right to lodge a complaint with the Information Commissioner’s Office at <https://ico.org.uk/concerns/>

10. Contact us

If you have any questions about this privacy notice or about your personal data, or if you want to provide updates to your data, make any changes to your communication preferences or exercise any of your rights as outlined above, please contact us at the following address: development@linacre.ox.ac.uk

11. Changes to this Privacy Notice

This privacy notice was last updated on [] 2020.

We reserve the right to update this privacy notice at any time. Any changes to this privacy notice will be posted to this page.