

# St Catherine's College Privacy Notice – Alumni, Donors, Parents and Supporters

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St Catherine's is more than just a College – it is a community. We rely upon our alumni, donors, parents and supporters in making this community a special one to be a part of. We respect your privacy and are committed to protecting your personal data.

## 1. About this privacy notice

The purpose of this privacy notice is to explain how St Catherine's College ("we", "our", "us") hold and use personal data about alumni, donors, parents and supporters ("you"), and how we use it for alumni, parent and supporter relations, and fundraising purposes.

It is important that you read this privacy notice together with our other privacy and data protection policies and notices, including any other privacy notices we may provide on specific occasions when we are using your data. These can be found at [www.stcatz.ox.ac.uk/about-us/policies](http://www.stcatz.ox.ac.uk/about-us/policies). This privacy notice supplements those other policies and notices and is not intended to override them.

We are the controller and responsible for your personal data. We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions regarding this notice, including any requests to exercise your legal rights, please contact the DPO by email at [DPO@stcatz.ox.ac.uk](mailto:DPO@stcatz.ox.ac.uk)

Our principles are simple – we will be transparent about what data we are collecting about you, where that data comes from, how we use the information we hold about you, and the choices you can make. We do not, and will not, sell your data.

Our overarching purpose in collecting and processing your data is to provide you with the best possible experience of being an alumnus/alumna, donor, parent or supporter of the collegiate University. It also enables us to ensure that any approaches we make to ask for your support of our alumni relations or fundraising goals are respectful, professional, and relevant to you. The colleges and the University work closely together to ensure we engage with you in a coordinated manner. They have aligned their privacy and data protection policies and notices to provide clarity for alumni, donors, parents and supporters. The University's privacy notices and policies can be found at <https://compliance.admin.ox.ac.uk/how-we-use-your-data>

## 2. What we do

St Catherine's College's Development Office exists to establish and develop lifelong relationships with and amongst our alumni, donors, parents and supporters. We're here to help you stay connected with each other, with St Catherine's College, and with the University of Oxford. Our communications with you will include news, research developments, events, reunions, volunteering opportunities, fundraising priorities and progress updates that are important to you.

Ever since our original formation as a non-collegiate student body, St Catherine's College has remained true to its founding principles of ensuring that students are undeterred from receiving an excellent Oxford education due to financial concerns. We fundraise to ensure that, thanks to the incredible generosity of our donors, St Catherine's College remains true to that founding principle.

### 3. Data we collect

We, St Catherine's College, collect data from you in three ways: directly from you during your ongoing relationship with us or with the University of Oxford; from publicly available sources; and/or from third parties providing us with services or acting on our behalf.

The amount of data we collect and hold 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 may hold and process the following types of personal data about you:

#### Biographical information, which may include:

- Name, title, contact details, date of birth, gender, marital status, spouse, partner and family details.
- For current or past students: student ID, programme of study, department, college, matriculation or start date, graduation date, degree conferred.
- Awards received whilst studying at Oxford (prizes, scholarships, accolades, bursaries); 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, including honours, life achievements.
- Profile pictures which come from publicly accessible sources (where copyright allows).
- 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 your personal interactions with us (e.g. correspondence, notes of meetings or conversations).
- Your communication preferences; records of communications you have received from us, incl. copies of letters, emails or appeal literature sent, and of fundraising activities in which you have been included (e.g. annual fund mailings, telephone fundraising campaigns).
- Your attendance (and that of your guests) on visits to, or at events across the collegiate University, including details of any payments made, and photographs, audio and video recordings in which you may be included.
- Your connections to other alumni, students, staff, friends, groups or networks, donors and supporters within the collegiate University community.
- 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.
- A record of volunteer work you have undertaken.

#### Information about your giving, which may include:

- Current and past donations and pledges, documentation relating to these gifts and records of the projects you have supported.
- Financial information required to process your gifts.
- 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.

- Thank you letters, donor reports provided relating to gifts you have made, correspondence and notes of meetings.
- Plans for activities and future interactions.
- Records of membership of any societies or groups related to your giving.
- Your relationship to friends and patrons groups associated with, or providing support to, the collegiate University.
- Your relationship to relevant trusts, foundations and corporates, e.g. membership on board of trustees.

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. This understanding may be provided by you or from information in the public domain.
- 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.
- Any estimate we may make regarding the potential scale of your support on the basis of the above information and your previous giving.
- Personal recommendations, where made by other supporters, that you may be willing and able to provide support.

Sensitive personal data, which may include:

- **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 (e.g. seating or access at an event, dietary requirements, provision of disabled parking, or allocation of accommodation). 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.
- **Race or ethnicity, religious beliefs, sexual orientation, political opinions** – we do not seek to obtain these categories of sensitive data. However, they may sometimes be inferred from other data we hold, for example, your relationships, society memberships, job titles, donations to specific causes or interests.

## 4. How we use your data

We will only use your personal data when the law allows us to. As explained in Section 8, we will most commonly use your personal data in the following circumstances:

- Where necessary to perform the contract we are about to enter into or have entered into with you.
- Where necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where necessary to comply with a legal obligation.
- Where you have consented.

More specifically, we will use your personal data for the following purposes in support of alumni, parent and supporter relations, and fundraising:

### For alumni, parents and supporter engagement

- To manage our ongoing relationship with you and to provide a record of your interactions and contributions to college and University life.
- To offer and manage a varied programme of events tailored to your interests, including networking events, subject reunions, Gaudy dinners, sports events, concerts, seminars and lectures.
- To ensure you are aware of the wider programme of events, lectures and seminars taking place across the collegiate University which we believe may be relevant to you and that you may have an interest in attending.
- To keep you up to date with news from the college, department, or other areas in which you have shown an interest, e.g. by making a donation or attending an event.
- To provide you with information about alumni benefits and services, including access to the University of Oxford Careers Service.
- To let you know of volunteering opportunities across the collegiate University, including linking current students with alumni for careers advice and internships, or speaking opportunities.
- To provide the most relevant content and best possible user experience when you are interacting with our digital communications and platforms.
- To identify and profile potential volunteers, alumni ambassadors and event attendees.
- To accept and process commercial revenue, e.g. for merchandise or event tickets.
- To undertake surveys and market research.
- To create classifications and groupings (through manual or automated analyses) in order to best direct engagement activities.
- To analyse the success of our engagement activities, collect feedback, and manage complaints.

### For all fundraising and donor stewardship

- To help ensure that our fundraising efforts are conducted as efficiently as possible, and that our approaches to potential donors are respectful, professional, and made, as far as possible, based on evidence and an understanding of what may interest you.
- To ask you for your support for our fundraising programmes, always mindful of fundraising best practice.
- To accept and process philanthropic revenue.
- To provide acknowledgement, recognition and stewardship of your gift.
- To inform you of the impact of your gift.
- To create classifications and groupings (through manual or automated analyses) in order to best direct fundraising activities.
- To support peer-to-peer fundraising campaigns.
- To inform fundraising, marketing and donor stewardship strategies.

### For fundraising for major gifts

- In addition to analysing data shared with us, we may use publicly available information and recommendations from staff and supporters to identify individuals who we believe may have the interest and financial capacity to make a major 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.
- Where this activity is being undertaken for a new contact with whom we have no previous relationship, we will provide the individual with a link to this privacy notice as part of our initial engagement.
- Information may be collated into a briefing or profile in order to assist the planning of an approach to a potential donor to discuss that individual's interest in our work and in supporting it.
- 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.

#### For operational reporting, management reporting, and governance

- 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. We will use only the data required and, unless necessary, we will use anonymised or pseudonymised data.

#### In our external communications

- 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.

## 5. When and how we share your data

We may, from time to time, need to share your personal data within the collegiate University of Oxford or with third-parties working on our behalf. 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.

Third parties will only process your personal data on our instructions and where they have agreed to treat your data confidentially and to keep it secure. We only permit them to process your personal data for specified purposes. We do not allow our third-party service providers to use your personal data for their own purposes nor to keep your data after the processing is complete. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies.

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

Your data may be shared in the following ways:

### Within the collegiate University of Oxford

We may share your data with colleges and departments that make up the collegiate University. We will do this only where it is necessary in order to carry out any of the purposes listed in this privacy notice. For example, where the University is coordinating with one or more colleges to organise shared events to which you are invited; to manage and coordinate relationship management activities with you; or to ensure your contact information and communication preferences are up-to-date.

We may also share relevant data, in appropriate circumstances, with college or University Sports Clubs and Societies where you are (or were) a member of that club or society.

### With partner organisations that accept gifts in support of St Catherine's College

The following organisations are among those that enable tax-efficient giving to St Catherine's College and the collegiate University of Oxford. Data may be shared by us with these and other such organisations where necessary in relation specifically to a donation you have made or pledged to make.

- **Americans for Oxford, Inc. (AFO)** accepts gifts in support of the collegiate University of Oxford. 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. 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 via the German Friends of Oxford University without incurring any fees.

### With third-party organisations engaged by St Catherine's College to provide services:

These include but are not limited to:

- Mailing houses, printers, event organisers or venues.
- Organisations providing tools such as relationship- or event-management systems; databases and reporting/analysis tools; alumni networking or crowdfunding platforms; email or survey tools; payment services (e.g. direct debit, online donation processing).
- Organisations assisting with activities such as market research, marketing and communications, organisational effectiveness, strategy and planning, auditing, business intelligence and analysis, customer experience.

Sharing your data with partner and third-party organisations may involve transferring it outside the UK.

## 6. How we protect your data

St Catherine's College takes precautions to safeguard your personal information against loss, theft and misuse, unauthorised access, disclosure and destruction through the use of appropriate administrative, physical and technical security measures.

**Where you have provided us with your credit or debit card information**, over the phone, or on a printed giving form, that data is stored securely and destroyed after your payment has been processed. Bank details used for processing Direct Debits are stored under the Direct Debit Guarantee Scheme. Online donations are processed via our third-party payment service providers and your credit or debit card information is not collected or stored by us.

**Whenever we transfer your personal data outside the UK**, we will ensure that a similar degree of protection is afforded to it by implementing at least one of the following safeguards:

- Ensuring that the country to which the data is transferred has been deemed to provide an adequate level of protection for personal data.
- Using specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you would like further information regarding the specific mechanism used by us when transferring your personal data out of the UK.

## 7. How long we use your personal data

**St Catherine's College** considers its relationship with alumni, donors, parents and supporters to be life-long and we will retain much of your data indefinitely unless you request otherwise. When determining how long we should retain your personal data we take into consideration our legal obligations and tax or accounting rules. If you have pledged a legacy gift, it will be necessary to retain your data until your gift is received, so that we can identify the gift against that pledge. When we no longer need to retain personal information, we ensure it is securely disposed of. We may keep anonymised statistical data indefinitely, but you cannot be identified from such data.

## 8. The legal basis for processing your data

We will only use your personal data where the law allows us to do so. Most commonly we will rely on one or more of the following legal bases for processing your personal data:

- It is necessary for the purposes of **legitimate interests** pursued by us or by a third party within the scope of this privacy notice, and those interests are not overridden by interests or fundamental rights and freedoms which require protection of the data to be processed. Where we use legitimate interest as the basis for our processing we have carefully considered each of the ways we process your data to ensure that we carry out our activities with a focus on the interests of our alumni, donors and supporters, and in the most efficient and effective way. Please contact us if you would like further information about our balancing of relevant interests in your case.
- It is necessary for **entering or performing a contract** with you. Information processed for this purpose includes, but is not limited to, the information you provide when you register for an event, or to enable us to process a donation.
- It is necessary for complying with our legal obligations, such as for: reclamation of Gift Aid on your donations; statutory returns to the Office for Students (OfS), the Charity Commission or ICO; participation in the HESA Graduate Outcomes Survey; responses to the Charity Commission or ICO in relation to audits or official investigations; responses to FOI Requests,

under the Freedom of Information Act 2000.

- You have **consented** to the processing for one or more specific purposes.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground(s) we are relying on to process your personal data, or if you have any concerns regarding our use of your data. Please also contact us if you wish to withdraw consent to our use of your personal data.

## Change of purpose

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 data for an unrelated purpose, we will seek your consent to use it for that new purpose. 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.

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

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the rights 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 personal data.** This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- **Request erasure of your personal 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), where we may have processed your data unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data’s accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to another party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.



- **Withdraw consent to the processing of your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you want to exercise any of the rights described above, or have any concerns regarding our processing of your personal data, please contact our DPO by email at [DPO@stcatz.ox.ac.uk](mailto:DPO@stcatz.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. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

If you remain dissatisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). You have the right to make a complaint at any time to the ICO. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

## 10. Contact us

If you have any questions about this privacy notice or our processing of your personal data, or if you wish to exercise any of your legal rights in connection with our processing of your personal data, please contact us at [DPO@stcatz.ox.ac.uk](mailto:DPO@stcatz.ox.ac.uk)

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 11. Changes to this Privacy Notice

We keep this privacy notice under regular review and will make any changes to it available on our website ([www.stcatz.ox.ac.uk](http://www.stcatz.ox.ac.uk)). It was last updated on 22 August 2022.