

Privacy Notice (Alumni)

This notice specifically relates to personal data processed by the Marketing and Communications team and departments of the University College engaging with alumni. This notice should be read in conjunction with the University College's Data Protection Policy.

All personal data is held and processed in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (the GDPR).

In brief this privacy notice explains:

- The data we hold about you, why we use your data to provide the best experience possible as an alumnus and to keep a permanent record of your time at AECC University College
- Your rights regarding the data we hold about you
- When your data is shared
- That we may send you content that is interesting or relevant about the work of the University College or how you can help students, but we will stop contacting you if you ask us to.

What data do we collect and for what purpose do we use it?

"All personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject." (Article 5 (1) (a) of the GDPR.)

We collect information you provide, like your name, email address, and postal address. We also collect information about you from your student record. This happens shortly after you graduate and we ask you to update the information we hold about you then, and at least annually from then on

The data the Marketing and Communications team may process could include:

- Your title, name (including former name), gender and date of birth
- Your year of study and degree details
- Your contact information including address, telephone number, email and social media details
- Your business details including positions, organisation, professional memberships and qualifications
- Events you have been invited to and whether or not you responded or attended
- A record of interactions with you
- Any other information you have provided us with

Other than the information contained within your student record, the majority of information listed above is only available to us if you have chosen to share it with us.

How we use the data we collect about you

As a member of our alumni, we will use your data to keep in touch with you.

We use your contact information to send you information about the University College, invitations to events or postgraduate courses you may be interested in.

We will only process your personal data to send you this information if we have carried out a legitimate interest assessment, or in other cases gained specific consent from you to do this.

Under the GDPR, we have to meet one of the conditions set out in Article 6 for processing your data. We use the information we collect only in compliance with this privacy notice.

In some cases, we may be obliged to process your data for statutory and contractual purposes, such as the Graduate Outcomes Survey.

Communications to you may be sent by post, telephone or electronic means (usually email), depending on the contact details we hold and the preferences expressed by you about the types of communications you wish to receive. If you provide us with contact details for a particular method of communication we will assume you have given us your consent for us to update your record and communicate with you using this information, unless you have told us otherwise.

Why we process your data

Processing justified by legitimate interests

We process your personal data in connection with our own internal reporting and analysis because we believe it is necessary for our legitimate organisational interest as specified in the GDPR in Article 6. By using your data in this way we are creating an alumni network that advances the aims of the University College and alumni, increase opportunities for alumni to develop in their careers, in subject knowledge and skills and as contributing members of society.

When we process your information we conduct a legitimate interest assessment to ensure that this processing isn't overridden by your rights or interests.

We also process data in carrying out a task in the public interest and in the exercise of our official authority. We always handle your personal data securely and minimise its use and your interests are not overridden by using your personal information for these purposes. In addition, there is no statutory or contractual requirement for you to provide us with any personal data.

What happens if you do not provide data

You are not required to provide personal data to us yourself – there is no statutory or contractual requirement for you to provide us with any personal information. However, should you decide not to provide additional data or update your previous student information we may be less able to provide the services you request at a later date.

Automatic decision making using your data

Sometimes we obtain publicly available data about you from third party websites and to ensure our data is as up to date as possible and this may include information about your career. We may process this data to enable us to identify possible opportunities for our students, or target mailings correctly. We may sometimes engage third parties to do this by way of profiling using only publically available information about you. To opt out of profiling, please contact us.

Updating your data

We will update the data we hold on you from time to time. For example, if you provide us with updated details or change your details, and we are obliged to keep our records of your contact details up to date so as to facilitate data collections for the UK government and will contact you from time to time for this purpose

Further processing

When you give us your personal information in connection with attending an event, please note that we may also use this information for internal analysis to determine how successful our events have been or how to better target them in future.

Who do we share your information with?

We do not share your information with other parties unless there is a legal or statutory requirement to do so. We will never sell, rent or trade your personal data. We may disclose your data to service providers who render services to us or you on our behalf, for example mailing houses (all of which are contractually obligated to act only on our instructions and in

accordance with applicable laws, including GDPR). We may disclose your information if required by law or to enforce our legal rights.
Our alumni records are held on a server in the UK.

How do we keep your information safe?

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

The data we hold about you is stored in secure, password protected systems, and can only be accessed by trained University College staff.

How long do you keep my information?

We will retain your data indefinitely in support of your lifelong relationship with the University College, or until you request us to do otherwise. We remove or delete some information when it is replaced with updated information.

Where you exercise your right to erasure, we will continue to maintain a core set of personal data (including core student record) to ensure we do not contact you inadvertently in the future. We may also need to retain some financial records about you for statutory purposes if you have donated money to the University College (anti-fraud and accounting matters).

Your rights

You have the right to access and be informed what personal data the University College holds about you and what it is used for (please refer to the University College's Subject Access Request form). You can also restrict processing of your data. We may amend this privacy notice from time to time, any significant changes to this notice or to the way we treat your data will be communicated via the AECC University College website or by contacting you directly through the most appropriate means.

You have the right to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/concerns>

We will publish any changes we make to this privacy notice on our website and notify you by other communication channels where appropriate.

Contact details

Should you wish to contact anyone regarding your personal data or if you have any concerns about the use or processing of your data, please contact: dpo@aecc.ac.uk

Version:	1
Ratified by:	SMG
Originator/Author:	Chief Operating Officer
Reference source:	HE Exemplars
Date approved:	13/10/2020
Effective from:	13/10/2020
Review date:	31/10/2023
Target:	Staff and students
Policy location:	SIP