

Privacy Notice – Alumni, Donors and Supporters

INTRODUCTION

Welcome to University College's privacy notice.

University College respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how University College collects and processes your personal data.

It is important that you read this privacy notice together with any other privacy notices we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data.

Data protection law requires University College, as data controller for your personal data:

- To process your data in a lawful, fair and transparent way;
- To only collect your personal data for explicit and legitimate purposes;
- To only collect personal data that is relevant, and limited to the purpose(s) we have told you about;
- To ensure that your personal data is accurate and up to date;
- To ensure that your personal data is only kept as long as necessary for the purpose(s) we have told you about;
- To ensure that appropriate security measures are used to protect your personal data.

1. IMPORTANT INFORMATION AND WHO WE ARE

CONTROLLER

University College is the controller and responsible for your personal data (referred to as University College, "we", "us" or "our" in this privacy notice).

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 about this privacy notice, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below.

CONTACT DETAILS

Our full details are: The Master and Fellows of the College of the Great Hall of the University Commonly Called University College in the University of Oxford.

Name of DPO: Outsourced services provided by Moore ClearComm

Email address: DataProtection@univ.ox.ac.uk

Postal address: University College, High Street, Oxford, OX1 4BH

You have the right to make a complaint at any time. You will need to complain to us first before you can approach the Information Commissioner's Office (ICO), the UK supervisory authority for data protection (www.ico.org.uk). Please contact us in the first instance if you wish to complain.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated in August 2025 and historic versions can be obtained by contacting us. We may need to update this notice from time to time. If the change is material, we will notify you of the change by contacting you at the details you have provided to us in your last correspondence.

It is important that the personal data we hold about you is accurate and current. We may ask you to confirm updates to your personal data from time to time but please keep us informed if your personal data changes during your relationship with us in the meantime. Please inform the College of any changes in your data at the following email address: DataProtection@univ.ox.ac.uk.

2. THE PERSONAL DATA WE MAY COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender and photographs, including CCTV images.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Professional Data** includes academic qualifications and achievements, references, profession, job title, employer and professional history of the same.
- **Welfare Data** includes grievance and disciplinary information, pastoral care records, information relating to criminal convictions and allegations of criminal activity, medical records and similar information, including dietary requirements, and religious information.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of transactions you have entered with us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

- **Profile Data** includes your username and password to any University College online service, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services, including materials from our libraries and archives.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Professional Data to calculate the percentage of students who go into a sector or industry. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We may also collect information about criminal convictions and offences. Further legal controls apply to personal data relating to criminal convictions and allegations of criminal activity. All such information is collected in accordance with this privacy notice. We have in place appropriate policy documents and/or other safeguards which we are required by law to maintain when processing such data.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract that we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to enrol you if you are a student or allow you access to our facilities such as the archive or library). We will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - make a donation to University College;
 - request access to our library or archive;
 - keep in touch with our Development Office;
 - make a payment to us for events or services; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details. We also use CCTV on the College premises for the purposes of safeguarding people and property.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - (a) analytics providers including Google Analytics by Google based outside the EU; and
 - (b) other search information providers that may be inside or outside the EU.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

- Identity, Professional, Contact, Technical, Usage and Profile Data from the University of Oxford as submitted by way of applications to University College, administration of the Bodleian Libraries and any other system operated by the University of Oxford which University College has access to.
- Professional Data from your previous educational establishments and/or employers if they provide references to the College.
- Identity and Contact Data from members of University College, family members, friends, visitors to University College and other contacts who may provide us with information about you.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

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

We may also use your personal data, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message (or in relation to certain special categories of (sensitive) personal data). You have the right to withdraw consent to marketing at any time by [Contacting us](#).

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out all the ways we may use your personal data:

- To register you as an alumnus
- To manage our relationship with you
- To enable you to partake in alumni and College events
- To manage payments, fees and charges
- To facilitate our fundraising programmes and enable you to make donations
- To ensure health and safety if required
- To use data analytics to improve our website, services, marketing, and experiences
- To provide references
- To manage our relationship with you which will include notifying you about changes to our terms, policies and procedures

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 we are relying on to process your personal data where more than one ground has been set out in the table below.

SUPPORTER INSIGHT REVIEW

We may make use of profiling to ascertain who may be able to support us with a larger gift and to provide a better experience for our alumni/donors. Profiling can help target our resources more effectively through gaining an insight into the background of our alumni/donors and helping us to build relationships that are appropriate to their interests and capacity to give. We use it to tailor our communication and to invite potential supporters to get involved with us in new ways. We may combine the existing information provided by alumni/donors with information from publicly

available sources. These may include charity websites and annual reviews, corporate websites, public social media accounts, the electoral register and Companies House. We only use reputable sources, where someone would expect their information may be read by the public. We use a processor to undertake this research on our behalf. This approach allows us to be more efficient and cost-effective with our resources, and also reduces the risk of someone receiving information that they might find irrelevant, intrusive or even distressing.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose

DISCLOSURES OF YOUR PERSONAL DATA

We do not sell your personal data to third parties. We will only share your personal data with third parties where we are allowed or required to do so by law.

We require all third parties and data processors to respect the security of your personal data and to treat it in accordance with the law. We do not allow our data processors to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. Data processors who process your personal data on our behalf are subject to contracts under which their processing activities are managed. Where your personal data is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

INTERNATIONAL TRANSFERS

Some of our external third parties are based outside the UK so their processing of your personal data may involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the [UK Government](#).
- Where we use certain service providers, we may use specific contracts such as an International Data Transfer Agreement (IDTA) or EU clauses supplemented by the UK Addendum and which will give personal data the same protection it has in the UK.
- Where we use providers based in the US, we may transfer data to them if they are part of the Data Privacy Framework and which has been deemed adequate by the UK Government. Alternatively, if they are not part of the Data Privacy Framework, we will ensure that there is an appropriate alternative safeguard in place. Please [Contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

5. DATA SECURITY

We have in place, appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors, processors and third parties who need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request by contacting us.

By law we have to keep some basic information (including Contact, Identity, Financial and Transaction Data) for pre-determined periods such as for tax purposes.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

7. YOUR LEGAL RIGHTS

You have the following rights under data protection laws in relation to your personal data:

- The right to have access to your personal data
- The right to request correction of your personal data
- The right to request erasure of your personal data
- The right to object to processing of your personal data
- The right to request restriction of processing your personal data
- The right to request transfer of your personal data (data portability)
- The right to withdraw consent
- The right to object to any direct marketing
- The right to object to any automated decision-making

Information about these legal rights can be found in the Glossary. If you wish to exercise any of the rights set out above, please [Contact us](#). Some of your 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.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances and we will notify you if this is the case.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

8. MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising:

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which events, services and activities may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or if you provided us with your details when you attended one of our events or accessed one of our facilities and, in each case, you have consented to receiving that marketing.

THIRD-PARTY MARKETING

We will get your express consent before we share your personal data with any organisation outside University College for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by [Contacting us](#) at any time.

9. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

10. THIRD-PARTY LINKS AND SOCIAL MEDIA

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We and organisations connected with us (such as the JCR – the junior common room - and the MCR – the middle common room - and other college associations) have a social media presence for the purpose of engaging with our students, alumni and visitors.

If you enable such connections or choose to communicate your personal data to us via third-party websites, third-party email providers or social media, please remember that we do not control these third-party systems and are not responsible for their privacy statements. When you leave our website or interact with us on social media, we encourage you to read the privacy notice of every website or forum that you visit or use.

GLOSSARY

LAWFUL BASIS

Legitimate Interests

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [Contacting us](#)

Performance of Contract

We process your personal data where it is necessary for the performance of a contract or agreement to which you are a party or to take steps at your request before entering into such a contract.

Legal or regulatory obligation

We process your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate personal data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal 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 personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information 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 personal 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: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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 you or to a third 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 at any time where we are relying on consent to process 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

Object to any direct marketing (for example, email marketing or phone calls) by us, and to require us to stop such marketing.

Object to automated decision-making about you which produces legal effects or otherwise significantly affects you.