

## **Brasenose College Alumni, Donors, and Friends Privacy Notice (v1.5)**

### **A summary of what this notice explains**

Brasenose College is committed to protecting the privacy and security of personal data.

This notice explains what personal data Brasenose College holds about alumni, donors and supporters (“you”), how we use it internally, how we share it, how long we keep it and what your legal rights are in relation to it.

For the parts of your personal data that you supply to us to us, this notice also explains the basis on which you are required or requested to provide the information. For the parts of your personal data that we generate about you, or that we receive from others, it explains the source of the data.

There are some instances where we process your personal data based on your consent. This notice sets out the categories and purposes of data where your consent is needed.

**Brasenose College has also published separate notices, which are applicable to other groups and activities. Those notices may also apply to you, depending on your circumstances, and it is important that you read this privacy notice together with other applicable privacy notices:**

- 1. current students**
- 2. current staff, office holders and senior members**
- 3. archives (which explains what data we hold in our archive)**
- 4. security, maintenance and health and safety (including how we use CCTV)**
- 5. website and cookies (including how we monitor use of our website)**

You can access these and past versions of our privacy notices at:

<https://www.bnc.ox.ac.uk/privacypolicies>

### **What is your personal data and how does the law regulate our use of it?**

“Personal data” is information relating to you as a living, identifiable individual. We refer to this as “your data”.

Data protection law requires Brasenose College (“us” or “we”), as data controller for your data:

- To process your data in a lawful, fair and transparent way;

- To only collect your data for explicit and legitimate purposes;
- To only collect data that is relevant, and limited to the purpose(s) we have told you about;
- To ensure that your data is accurate and up to date;
- To ensure that your 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 data.

### **Brasenose College's Contact Details**

If you need to contact us about your data, please contact:

The Data Protection Officer  
Brasenose College,  
Radcliffe Square  
OX1 4AJ

[data.protection@bnc.ox.ac.uk](mailto:data.protection@bnc.ox.ac.uk).

### **What personal data we hold about you and how we use it**

We may hold and use a range of data about you at different stages of our relationship with you. We might receive this data from you; we might create it ourselves, or we might receive it from someone else (for example, the University or student societies that you were a member of).

Categories of data that we collect, store and use include (but are not limited to):

- Contact details that you provide to us, including names, addresses and telephone numbers.
- Details of prizes, scholarship and/or bursaries you support.
- Donation histories, including contacts made, details of amounts given and pledged, projects supported and Gift Aid forms.
- Financial information including your contact information and details of invoicing and outstanding payments (including banking or other payment information) for facilities and services provided by the College at your request.
- Dietary and accessibility requirements
- Details of criminal convictions or charges to the extent these are required for compliance with our legal obligations.
- Photographs, audio and video recording of College events that you attend.

- 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 circumstances. For more information please see our vulnerable persons policy: <https://www.bnc.ox.ac.uk/vulnerablepersons>

We have a downloadable, detailed table (ROPA – Records of Processing Activities) setting out the processing activities that we undertake, the source of the data, the reasons why we process it, how long we keep it and the lawful basis we rely on for both your personal and special category data. It can be found at <https://www.bnc.ox.ac.uk/privacypolicies>

### **The lawful basis on which we process your data**

The law requires that we provide you with information about the lawful basis on which we process your personal data, and for what purpose(s).

Most commonly, we will process your data on the following lawful grounds:

- Where it is necessary to perform the contract we have entered into with you;
- Where necessary to comply with a legal obligation;
- Where it is necessary for the performance of a task in the public interest;
- 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.

We may also use your personal information, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests. In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent.

### *How we apply further protection in the case of "Special Categories" of personal data*

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information.

The Special Categories of personal data consist of data revealing:

- racial or ethnic origin;

- political opinions;
- religious or philosophical beliefs;
- trade union membership.

They also consist of the processing of:

- genetic data;
- biometric data for the purpose of uniquely identifying someone;
- data concerning health;
- data concerning someone's sex life or sexual orientation.

We may process special categories of personal information in the following circumstances:

- With your explicit written consent; or
- Where it is necessary in the substantial public interest, in particular:
  - for the exercise of a function conferred on the College or anyone else by an enactment or rule of law; or
  - for equal opportunities monitoring;
- Where the processing is necessary for archiving purposes in the public interest, or for scientific or historical research purposes, or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law.

We have in place an appropriate data handling policy and other safeguards that are required by law to maintain when processing such data.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

#### *Criminal convictions and allegations of criminal activity*

Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. We may process such data on the same grounds as those identified for “special categories” referred to above.

Further processing activity carried out by the College, which relates to criminal offences or allegations involving donors and supporters including prospective donors and supporters (for example, in relation to money laundering or bribery offences) is also carried out for the purposes of:

1. complying with, or assisting other persons to comply with, a regulatory requirement which involves Brasenose College taking steps to establish whether another person has:
  - a. committed an unlawful act, or:
  - b. been involved in dishonesty, malpractice or other seriously improper conduct; and
2. in the circumstances, the College cannot reasonably be expected to obtain your consent to the processing, and the processing is necessary for reasons of substantial public interest.

#### *Details of our processing activities, including our lawful basis for processing*

Details of the lawful bases we rely on for the processing of the categories of data that we hold in relation to current staff, office holders and senior members are set out in our Record of Processing Activity (ROPA) (<https://www.bnc.ox.ac.uk/privacypolicies>). Details of retention periods are also available here.

#### **Profiling**

Brasenose College may analyse the personal information we collect about you, including your known interests, activities and/or hobbies, in order to build a profile which helps us to decide what communications are likely to be of interest to you. In addition to information that you have provided to the College over time, we may be given information by your family, friends, colleagues and acquaintances. We may also seek out information, using public databases, in order to fill-in gaps in our knowledge and thereby deepen our relationship with you.

We may seek out publicly available information about you, such as changes in employment, directorships, achievements, honours and other news. Information collected may include the likely value of your residence (based on your postcode), and past records of support and/or donations to charity where this is recorded on publicly available websites, via public social media, or in filed charity accounts. Information gathered is then combined with that already held, in order to assess your ability to contribute to College projects and initiatives, or to provide a legacy donation.

While we do have a legitimate interest in carrying out such analysis, you have the right to request that we do not process your personal data in this way.

We do not outsource profiling activity. If we decide to outsource such activity in future, we will inform you of who we are outsourcing the activity to and provide you with not less than 1 months' notice of this.

## Data that you provide to us and the possible consequences of you not providing it

Most data that you give to us is provided on a wholly voluntary basis – you have a choice whether to do so. Examples include:

- Disability and health condition information, which you may choose to provide to us in order that we can take this information into account when considering whether to make a reasonable adjustment under the Equality Act 2010, for example in relation to accessibility.
- Gift Aid information, which you may choose to provide while making philanthropic donations in order that the College and/or the University is able to recover Gift Aid amounts in relation to your donations.

The consequences for any failure to provide such data will depend on the particular circumstances. For example, if you decide not to provide information about your disability, this might mean that we cannot make a reasonable adjustment to assist you.

## Other sources of your data

Apart from the data that you provide to us, we may also process data about you from a range of sources. These include:

- Data that we generate about you, such as when communicating with you, receiving your donations, and/or inviting you to or arranging your attendance at events;
- The University of Oxford, which operates a number of systems that Colleges have access to, including the Development and Alumni Relations System.
- Third parties who process donations that you make to the College, such as the University shop, and Blackbaud Merchant Services and Just Giving (and similar payment and donation portals);
- Local and international media sources, when you are mentioned in published articles, lists or other commentary;
- Fellow alumni of the College, family members, friends, visitors to the College and other contacts who may provide us with information about you if and when they contact us, or vice versa.

Our Record of Processing Activity (ROPA) indicates the sources of each of the various categories of data that we process. These can be found at <https://www.bnc.ox.ac.uk/privacypolicies>

## How we share your data

We do not, and will not, sell your data to third parties. We will only share it with third parties external to the collegiate University if we are allowed or required to do so by law.

Examples of bodies to whom we are required by law to disclose certain data include, but are not limited to:

| Organisation                 | Why?  |
|------------------------------|---|
| HM Revenues & Customs (HMRC) | Information released to HM Revenue & Customs (HMRC) in order to collect Gift Aid contributions.   |
| Charity Commission           | In response to official investigations regarding our charitable status and activities, and/or in relation to statutory returns or audits. |

Examples of bodies to whom we may voluntarily disclose data, in appropriate circumstances, include but are not limited to:

| Organisation   | Why?   |
|--|--|
| Other Colleges and/or PPHs within the University of Oxford | Contact information, education and interest data, and whether a person is a donor is shared within the collegiate University via the Development and Alumni Relations System (DARS). Additional data may also be shared to facilitate joint events |
| Third party service providers                              | To facilities activities of the College. Any transfer will be subject to an appropriate, formal agreement between the College and the processor.   |

Where information is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our Supplier Information Security policies, and are only permitted to process your personal data for specific purposes in accordance with our instructions. We do not allow our third party providers to use your personal data for their own purposes.

More information on the categories of recipients of your data is set out in a table called Brasenose Data Sharing found here <https://www.bnc.ox.ac.uk/privacypolicies>.

### **Sharing your data outside the UK / European Economic Area (EEA)**

An EU GDPR adequacy decision on UK GDPR means that personal data (except any data transferred specifically for UK immigration control) can flow between the UK & European Economic Area (EEA) without any additional measures. The law provides various safeguards where data is transferred outside of the UK and EEA.

When you are resident outside either the UK or an EEA country where there is no “adequacy decision” by the European Commission, and an alternative safeguard is not available, we may still transfer data to you which is necessary for performance of your legitimate interest with us.

We may transfer your data outside the UK or European Economic Area (EEA), but only for the purposes referred to in this notice and provided either:

- There is a decision of the European Commission that the level of protection of personal data in the recipient country is adequate; or

- There is either a decision of the UK ICO that the level of protection of personal data in the recipient country is adequate or appropriate safeguards can be put in place to ensure that your data is treated in accordance with UK data protection law, for example with use of standard contractual clauses; or

- There is an applicable derogation in law which permits the transfer in the absence of an adequacy decision or an appropriate safeguard.

**AND/OR** we intend to transfer the following information about you to the following countries:

| <b>Country</b> | <b>Reason for transfer</b> | <b>Data to be transferred</b>                      |
|----------------|----------------------------|--|
| Switzerland    | Donation process           | Name;donation;amount; contact details; restriction |
| US             | Donation process           | Name;donation;amount; contact details; restriction |
|                |                            |  |

In the case of the US there are adequacy decisions by both the European Commission (EU-US Data Privacy Framework) & UK (the UK-US Data Bridge Regulations), which means both bodies have decided that an adequate level of protection for personal data has been met.

### **Automated decision-making**

We do not envisage that any decisions will be taken about you based solely on automated means, however we will notify you in writing if this position changes.

### **How long we keep your data**

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

The detailed record of processing activities (ROPA) explains how long we will keep your data. This can be found at <https://www.bnc.ox.ac.uk/privacypolicies>

Retention periods may increase as a result of legislative changes, e.g. an increase in limitation periods for legal claims would mean that the College is required to retain certain categories of personal data for longer. Any such changes will be reflected in updated versions of our Record of Processing Activity.

If there are legal proceedings, a regulatory or criminal investigation, suspected criminal activity, or relevant requests under data protection or freedom of information legislation, it may be necessary for us to suspend the deletion of data until the proceedings, investigation or request have been fully disposed of.

Please note that we may keep anonymised statistical data indefinitely, but you cannot be identified from such data.

### **Your legal rights over your data**

Subject to certain conditions and exception set out in UK data protection law, you have:

- The **right to request access** to a copy of your data, as well as to be informed of various information about how your data is being used;
- The **right to have any inaccuracies in your data corrected**, which may include the right to have any incomplete data completed;
- The **right to have your personal data erased** in certain circumstances;
- The **right to have the processing of your data suspended**, for example if you want us to establish the accuracy of the data we are processing.
- The right to receive a **copy of data you have provided to us**, and have that transmitted to another data controller (for example, another University or College).
- The **right to object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing to you.
- The **right to object to the processing of your information** if we are relying on a “legitimate interest” for the processing or where the processing is necessary for the performance of a task carried out in the public interest. The lawful basis for any particular processing activity we carry out is set out in our detailed table of processing activities (ROPA) that can be found at this link: <https://www.bnc.ox.ac.uk/privacypolicies>.
- The **right to object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.

- Where the lawful basis for processing your data is **consent**, you have the **right to withdraw your consent at any time**. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent. You may withdraw your consent by contacting the College Data Protection Officer:

The Data Protection Officer  
Brasenose College,  
Radcliffe Square  
OX1 4AJ  
[data.protection@bnc.ox.ac.uk](mailto:data.protection@bnc.ox.ac.uk).

If you wish to exercise any of your rights in relation to your data as processed by Brasenose College please contact our Data Protection Officer at the address above. 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.

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk/>). You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office at <https://ico.org.uk/concerns/> if you believe that your data has been processed unlawfully.

### **Future changes to this privacy notice**

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes or to make the College or University's operations and procedures more efficient. If the change is material, we will give you not less than two months' notice of the change so that you can exercise your rights, if appropriate, before the change comes into effect. We will notify you of the change by email or in writing.

You can access past versions of our privacy notices here:

<https://www.bnc.ox.ac.uk/privacypolicies>

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