

Privacy Notice: Alumnae, donors and supporters

This privacy notice applies to St Hilda's College alumnae, donors and supporters.

All Privacy Notices and Records of Processing Activities (ROPA) are published on the College website to show how the College keeps and processes personal data. (<https://www.st-hildas.ox.ac.uk/about-us/governance?tab=privacy-notices>)

1. A summary of what this notice explains

St Hilda's College is committed to protecting the privacy and security of personal data.

This notice explains what personal data St Hilda's College holds about alumnae, 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, 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 on the basis of your consent. This notice sets out the categories and purposes of data where your consent is needed.

2. 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".

"Processing" your data includes various operations that may be carried out on your data, including collecting, recording, organising, using, disclosing, storing and deleting it.

Data protection law requires St Hilda's 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

3. St Hilda's College's Contact Details

If you need to contact us about your data, please contact the Data Protection Officer, St Hilda's College, Cowley Place, Oxford OX4 1DY. Tel: 01865 276803. Email: dpo@st-hildas.ox.ac.uk.

4. 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 of which you were a member).

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, scholarships 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 for facilities and services provided by the College at your request. We also engage third party providers to process credit card payments to St Hilda's College. Links to their privacy notices are provided on our website for donations at <https://www.sthildas.ox.ac.uk/content/how-make-gift>
- 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

Further categories of data that we hold in relation to alumnae, donors and supporters are set out in our Record of Processing Activity (ROPA), available on the College [website](#).

5. 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 take steps (at your request) prior to entering a contract with you
- where it is necessary to perform the contract we have entered into with you
- where it is 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 St Hilda's 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 appropriate policy documents and/or other safeguards which we 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 St Hilda's College which relates to criminal offences or allegations (for example, in relation to money laundering or bribery offences) involving donors and supporters, including prospective donors and supporters, is also carried out for the purposes of:

1. complying with, or assisting other persons to comply with, a regulatory requirement which involves St Hilda's 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, St Hilda's 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 alumnae, donors and supporters, including retention periods and details of parties to whom we transfer data, and on what basis, are set out in our Record of Processing Activity (ROPA), and available on the College [website](#).

Profiling

St Hilda's 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 St Hilda's College over time, we may be given information by your family, friends, colleagues and acquaintances. We may also seek out information, using public and/or private 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. We may also consult commercial providers who collate publicly available information including about your employment, directorships, achievements, honours and other news about you which is indicative of your behaviour as a

potential donor. 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 or in filed charity accounts). Information gathered is then combined with that already held, in order to assess your ability to contribute to St Hilda's College's 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 outsourced some profiling activity to the UK branch of WealthEngine in 2016. We retain the data provided at that time, and WealthEngine deleted all data following the profiling process.

6. 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 of 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 run by St Hilda's College
- the University of Oxford, which shares relevant information held on its Development and Alumnae Relations System with St Hilda's College
- third parties who process donations that you make to St Hilda's College or payments for event attendance, such as Eventbrite
- local and international media sources, when you are mentioned in published articles, lists or other commentary
- fellow alumnae of St Hilda's College, family members, friends, visitors to St Hilda's College, former tutors, 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 indicates the sources of each of the various categories of data that we process.

7. 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:

- **Who:** HM Revenue & Customs (HMRC)
 - **Why:** Information released to HM Revenue & Customs (HMRC) in order to collect Gift Aid contributions
- **Who:** Charity Commission
 - **Why:** 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:

- **Who:** Other colleges and/or PPHs within the University of Oxford
 - **Why:** Contact information, education and interest data, and whether a person is a donor may be shared within the collegiate University, particularly where a person is a member of more than one college. Additional data may also be shared to facilitate joint events
- **Who:** Third party service providers
 - **Why:** To facilitate activities of St Hilda's College, for example disclosing contact details to mailing houses. Any transfer will be subject to an appropriate, formal agreement between St Hilda's 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 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 extensive information on the categories of recipients of your data is set out in our privacy notices and records of processing activities, available on the College [website](#).

Sharing your data outside the European Union

The law provides various further safeguards where data is transferred outside of the EU.

When you are resident outside the EU in a 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 contract with us.

We may transfer your data outside the European Union, 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*
- appropriate safeguards are in place to ensure that your data is treated in accordance with UK data protection law, for example through the 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

In the case of the US, there is an adequacy decision by the European Commission, which means the Commission has decided that it has an adequate level of protection for personal data for the time

being. Data (including but not limited to contact and donation details) may be securely transferred to the American Friends of St Hilda's, which is a US registered charity [501(c)(3)] overseen by Hemenway & Barnes LLP, for the purposes of fundraising and maintaining contact with alumnae in the US.

8. 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.

9. 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.

Details of expected retention periods for the different categories of your personal information that we hold are set out in our Record of Processing Activity.

Retention periods may increase as a result of legislative changes, e.g. an increase in limitation periods for legal claims would mean that St Hilda's 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.

10. Your legal rights over your data

Subject to certain conditions and exceptions 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.
- 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).
- 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 Data Protection Officer, St Hilda's College, Cowley Place, Oxford OX4 1DY; 01865 276803; dpo@st-hildas.ox.ac.uk.

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.

11. 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 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, post, or on the St Hilda's College website.

Version control:

V.1	May 2018	Privacy Notices produced in line with GDPR guidance for different College audiences.
V.2	May 2024	Privacy Notice updated with new contact details, and for more consistent, accessible formatting. Website reference updated for Record of Processing Activities (ROPA).