

YOUR PERSONAL DATA: INFORMATION FOR ALUMNI AND SUPPORTERS

INTRODUCTION

Heriot-Watt University was founded with the help of philanthropy. Charitable giving and volunteering continue to make an enormous impact at our University. We have a duty to keep an accurate record of Heriot-Watt University's alumni and philanthropic donors to the University. We could not fulfil this function without collecting, holding and using your personal data. We also keep a record of the University's governing body and committee members, recipients of honorary degrees, prospective donors to the University, registrants for University events, honorary academics and appointees as well as other external supporters and stakeholders involved with the University.

We analyse the data that we hold to understand the interests and preferences of our alumni and supporters about communications, services, events and opportunities to support our work. For a small number of current and potential supporters we use information gathered from public sources alongside the information you provide to identify who might support particular University initiatives as a volunteer or donor. We value our relationship with you and use your personal data to ensure we contact you in the most appropriate way, respect your wishes about communication, improve our services and work efficiently and effectively.

This guide explains what we do with your personal information and why. This is a living document and will be updated as needed from time to time.

WHO IS THE DATA CONTROLLER?

Heriot-Watt University is the Data Controller for personal data we hold about you. If you studied with the Edinburgh Business School (EBS) for a Heriot-Watt University (HWU) award, the University and EBS are joint data controllers. Where we use the term 'our University', this includes all members of the Heriot-Watt University Group. We hold your personal data securely and restrict access to personal information to people who need to use it in the course of their duties. When collecting and processing information about you, we must comply with the UK Data Protection Act, 2018, the European Union General Data Protection Act, 2010, that apply in the countries in which the University operates.

WHAT PERSONAL INFORMATION WE COLLECT AND USE

We collect and hold personal information in all formats for the purposes set out in this guide.

ALUMNI

All University alumni become members of the Watt Club, the University Alumni association, on graduation. We receive initial data from the University's student records system. We maintain your data and keep it up to date using any updates that you may give us, including your contact preferences e.g. via email, post.).

- Personal details including name, gender, date of birth and matriculation number.
- Education records including subject, year of graduation and qualification gained.
- Any scholarships and awards you have received as a student
- Details of your hobbies, interests, student club and society memberships if you choose to share them with us

ALUMNI AND OTHER CURRENT AND POTENTIAL SUPPORTERS

- Contact information: email, phone and postal addresses that you give us and details of how you wish us to contact you
- Relevant employment details if you provide them to us
- Financial information when it is needed to process donations
- Records of current and historical donations made to the University
- Details of outgoing and incoming correspondence with you
- Whether you open the emails we send and whether you click links in those emails
- Survey responses

- Your participation in University events and activities
- Volunteering data (if you have offered to speak at an event for example
- History of your involvement with the University if you have served on our governing body, received an honorary award or appointment
- Our assessment of your potential interest in supporting particular University development initiatives as a donor or volunteer
- Information you share with us on our social media accounts

We also use the following data to identify a small number of alumni, current and potential supporters who are in public facing roles, have a history of board and committee membership, volunteering or philanthropic giving or the potential capacity to support causes that are relevant to the University's mission.

- Published online and print media
- Companies House
- Corporate websites

- Charity registers
- Electoral register
- Government land registries

REPRESENTATIVES OF TRUSTS AND CORPORATE BODIES

- Contact details obtained from public sources including corporate websites, charity registers and Companies House
- Details of our interactions with you to discuss our development opportunities and to assess our eligibility for funding

SPECIAL CATEGORIES OF DATA

We may also process sensitive information, also known as special categories of data under the following conditions

- With your explicit consent: details of your dietary and access requirements that you have given us as part of event registrations.
- Where we are required by law to undertake due diligence when offered high value donations to ensure that our funding is lawfully obtained, and when considering nominations for honorary awards and volunteer positions

WHY WE COLLECT AND USE YOUR PERSONAL DATA

FOR MANAGING WATT CLUB MEMBERSHIP, ELECTIONS AND BRANCH MEETINGS

What's our legal basis?

The <u>University Charter and Statutes</u> gives us legal authority to process your personal data where this is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the University and EBS as Data Controllers. The Charter and Statutes and their underpinning <u>Ordinances</u>, which describe the University's powers in more detail, mandate and set out the constitution of the Watt Club

We collect and use your information to:

- Keep a comprehensive membership list and electoral roll for The Watt Club
- Administer elections to enable Watt Club members to nominate and elect representatives to serve on the University Court
- Invite Watt Club members to branch meetings and activities
- Enable the University to engage with our alumni members

FOR ADMINISTRATIVE AND FINANCIAL MANAGEMENT PURPOSES:

To keep records and administer donations to the University.

What's our legal basis?

- The <u>University Charter and Statutes</u> gives us legal authority to process your personal data where this is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the University and EBS as Data Controllers.
- We are required by law to keep records of donations and grants for tax and audit purposes

We collect and use your information to:

- Administer any donations made to the University.
- Submit <u>Gift Aid</u> claims to Her Majesty's Revenue and Customs (HMRC) for UK donations made under the scheme.
- Record any philanthropic scholarships or funding you received as a student in order to report to donors where this has been agreed. Only relevant information (name and (in some cases) academic performance) is released to the sponsor.

FOR ALUMNI ENGAGEMENT, MARKETING AND FUNDRAISING PURPOSES: to

- Keep you up to date with University news and developments.
- Provide opportunities to connect to other Watt Club Members through our online platform and to invite you to attend events.
- Tell you about opportunities to contribute to the University either financially or as a volunteer

What's our legal basis?

- We will only contact you if you have provided us with your prior consent for electronic communication including email, telephone calls and SMS.
- For postal marketing and postal fundraising communication, we are relying on our legitimate interests to contact you as a graduate or donor or prospective donor.

We will always respect your privacy and your wishes in how we contact you. We will never seek to obtain from elsewhere any personal contact details, including home postal or email addresses, landline or mobile phone numbers, that you have not chosen to share with us.

If you have connected with us on LinkedIn and updated your details there e.g. if you change jobs, we will contact you via LinkedIn to ask if we may add your updated details to our database.

We will use your data to:

- Send you publications (e.g. alumni magazines and news about the University)
- Conduct surveys to help us improve our service, including research on whether particular donations or funding appeals may be of interest to you
- Provide services, including access to the University Careers Service for recent graduates
- Send you proposals, appeals and requests for donations where appropriate.
- Send you details of volunteering opportunities
- Invite you to Alumni and other University events
- Promote other opportunities and services available to you (e.g. the opportunity to join our online platform <u>Watt Club Connect</u>).

FOR BIOGRAPHICAL RESEARCH TO PRIORITISE OUR DEVELOPMENT ACTIVITIES

What's our legal basis? We rely on our legitimate interests to undertake biographical research about current and potential supporters to contribute to the University's strategic development.

Using our own data, we will undertake research and analysis about our alumni and supporters and your interactions with us to identify your areas of interest and send you communications that are relevant to you.

For a small number of alumni and other current and potential supporters who have a public profile we will research biographical details of individuals from external published sources. We will only retain this data for as long as needed to identify your specific interests and potential capacity to support particular fundraising or volunteering initiatives, prior to making contact with you.

By doing this, we can focus conversations we have with you about fundraising and volunteering in the most effective way, and ensure that we provide you with an experience which is appropriate for you.

FOR STATUTORY PURPOSES

- Conducting due diligence, including reviewing publicly available personal data relating to an individual's criminal convictions and offences, before we nominate for or award individuals with honorary degrees.
- Conducting due diligence, including reviewing publicly available personal data relating to a donor's criminal convictions and offences before seeking or accepting major donations.
- To provide contact details to the UK Higher Education Statistics Agency (HESA) in order for the University to participate in statutory surveys such as <u>Graduate Outcomes</u>.

FOR ARCHIVING AND RESEARCH

What's our legal basis?

Where this is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

While always protecting your rights to privacy we will retain some records permanently in the University Archive to.

- Keep a permanent archival record of your time studying with us
- Preserve minutes and other records of Watt Club Council, branches and activities
- Retain copies of promotional material and other records of University community life that may include images and other data about alumni and supporters

We will also

- Support academic research under strict confidentiality;
- Produce management and statistical information to monitor and improve our performance and our services to you and inform strategic planning

WHO YOUR INFORMATION MAY BE SHARED WITH AND WHY

We may publish or share your personal data only where we have your consent or where one of the following conditions are met.

We may appoint people and organisations to work for us and contract with them to act as data processors on our behalf for any of the above purposes. Examples include processing direct debit donations (currently <u>Donor Debit</u>), our online networking platform (<u>Watt Club</u> <u>Connect</u>), our database and email marketing provider (<u>Blackbaud</u>), employment of development consultancy services to undertake due diligence and biographical research.

We will also disclose limited personal data to the relevant authorities where this is necessary for the Statutory Purposes set out above.

INTERNATIONAL DATA TRANSFERS

As a global organisation we need to process your personal information in a country outside the UK or <u>European Economic Area</u> when this is necessary to provide you with services, meet a legal obligation, fulfil a contract with you, or we have your consent. For example if you register for an event that is taking place in one of our Watt Club Regional Areas we may wish to share relevant information with the event organiser in order for you to attend. When doing so we:

- Make sure that appropriate safeguards are in place to protect your information and your rights under privacy law.
- Apply the same high standards of privacy and security wherever we process your data.

HOW LONG WE KEEP YOUR PERSONAL DATA

We keep a limited permanent record of your attendance, what you studied and your award so that we can verify this as needed and for archival purposes. If you stay in touch with us as a member of the Watt Club, our alumni association, we will keep your contact details and other information that you share with us up to date. More information about how long we keep your personal data and why is listed in our retention schedules which can be viewed <u>here.</u>

YOUR RIGHTS

You have the right to:

- Find out what personal data we process about you and obtain a copy of the data, free of charge within one month of your request. We may make a charge for additional copies of the same information.
- Ask us to correct inaccurate or incomplete data.

If you think we are acting unfairly or unlawfully you can:

- Object to the way we are using your data.
- Complain to the UK Information Commissioner's Office.

Under certain conditions you also have the right to ask us to:

- Restrict the use of your data e.g. if you have raised issues about the accuracy or use of your personal data, until we have investigated and responded to your concerns.
- Erase your information or tell us to stop using it to make decisions about you.
- Comply with your wishes where you have previously agreed to us processing your data for a particular purpose and have withdrawn your consent to further processing.
- Provide you with a portable electronic copy of data you've given us.

DATA PROTECTION OFFICER AND CONTACT DETAILS

If you have any questions about what we do with your personal information or your rights under privacy laws, you can contact us in the following ways:

Data Protection Officer,	Student Compliance Manager,
Heriot-Watt University,	Edinburgh Business School,
Edinburgh EH14 4AS, UK	Heriot-Watt University,
Phone:+ 44 (0)131 451 3218/3219/3274	Edinburgh, EH14 4AS, UK
Email: <u>HIG@hw.ac.uk</u>	Phone +44 (0)131 451 4764
https://www.hw.ac.uk/about/policies/data-	Email: <u>ss1@ebs.hw.ac.uk</u>
protection.htm	https://www.ebsglobal.net/

FIND OUT MORE ABOUT YOUR RIGHTS UNDER PRIVACY LAW

In our <u>Data Protection Policy</u> and our webpages: <u>https://www.hw.ac.uk/about/policies/data-protection.htm</u> <u>https://www.hw.ac.uk/services/heritage-information-governance/protecting-information.htm</u> On the website of the UK <u>Information Commissioner's Office</u>