

LEEDS BECKETT UNIVERSITY ALUMNI RELATIONS PRIVACY NOTICE

Introduction

The Alumni Team at Leeds Beckett University is here to support our alumni, friends and partners, keeping you informed as to what is happening at the university and beyond: engaging with you on relevant activities, which we hope, will be of interest to you. This includes sharing university, alumni and supporter news and activities, events, reunions, fundraising campaigns, networking, career and volunteering opportunities.

We value our relationship with you, and we use your personal data to ensure we communicate with you in the most appropriate way, to improve our services and to ensure we work efficiently and effectively. In order to do this, we have university systems that contain personal data collected by the university during the course of our relationship with our students, alumni, friends and partners.

Our alumni, friends and partners are extremely important to us, and this Privacy Notice explains how Leeds Beckett University collects, stores, manages and protects alumni, friends and partners personal data. It outlines the types of personal data that we hold and how we use it to provide services to our alumni, friends and partners. We aim to be clear when we collect your personal data, and not do anything you wouldn't reasonably expect when processing it.

Questions

If you have any questions or concerns about participation in Alumni activities and how your personal data will be collected and managed, please contact the Alumni Team at alumni@leedsbeckett.ac.uk

If you have any other questions or concerns about LBU's processing of information for alumni activity purposes and the content of this privacy notice, please contact:

Information Compliance Team Email: infocompliance@leedsbeckett.ac.uk or:

LBU Data Protection Officer (DPO) Email: dpo@leedsbeckett.ac.uk

Telephone: 0113 812 7542

Address: Leeds Beckett University, 107 Old Broadcasting House, City Campus, Leeds LS2 9EN

About this notice

In this Notice "LBU", "the university", "we", "our" and "us" refers to the Leeds Beckett University. References to "you" and "your" refers to the alumni, friends and partners of the University.

The Data Protection Act 2018 shall be referred to as "DPA".

The General Data Protection Regulations 2016 will be referred to as "GDPR".

The Privacy and Electronic Communications (EC Directive) Regulations 2003 will be referred to as "PECR" (this also applies when we market by email and phone).

"Personal data" is any information that identifies you.

"Special category personal data" is any information that identifies racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

A "Data subject", is you – if we hold personal data about you.

As a result of your participation in our alumni activity, LBU will hold your "personal data", i.e. information in a form that identifies you as individual [often referred to as "data" in this Notice]. LBU is the data controller of the information it collects and processes, as described in this Notice. This

means that it has the core legal responsibility to safeguard the information and ensure it is processed lawfully. This requirement is set out in the GDPR and in UK law under the DPA. Legal requirements under PECR will also apply where we market by email and phone.

LBU as a data controller must:

- Take steps to ensure that the data it processes is accurate and up to date;
- Give you clear information about its processing of your data, in one or more privacy notices like this one and the participant information sheet (referred to together in this section as a “Privacy Notice”);
- Only process your data for specific purposes described to you in a Privacy Notice, and only share your data with third parties as provided for in a Privacy Notice; and
- Keep your data secure.

Your rights as a data subject and how to exercise them

Under the data protection laws, you have a number of rights and freedoms in relation to our processing of your data. In summary these are:

- Right to request access to your data as processed by LBU and information about that processing
- Right to rectify any inaccuracies in your data
- Right to request erasure of your data from our systems and files
- Right to place restrictions on our processing of your data
- Right to object to our processing of your data

If you would like to exercise any of your rights as outlined above, you can contact the Information Compliance Team or DPO as above or visit the [Data Protection](#) page on our website

We will always aim to respond clearly and fully to any concerns you have about our processing and requests to exercise the rights set out above. However, as a data subject, if you have concerns about our data processing or consider that we have failed to comply with the data protection legislation, then you have the right to raise a complaint with the data protection regulator, the Information Commissioner’s Office (ICO):

Online reporting: <https://ico.org.uk/concerns/>

Email: casework@ico.org.uk

Tel: 0303 123 1113

Post: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Your privacy rights under PECR and how to exercise them

PECR covers several areas but for this notice covers marketing by electronic means, including marketing calls, emails, texts and faxes. You have a right to complain to the ICO (details as above) about electronic marketing or other privacy issues regarding electronic communications.

How and why we will collect your personal data

Our core mission is to advance education, knowledge and learning through teaching and research. Our students (past, present and future) and our communities, have an expectation that we will work in partnership with them to enable them to succeed academically, but also to champion social, cultural and economic growth and secure our future sustainability. We do this through a variety of teaching, student, research, community and capital projects, which our alumni engagement and fundraising activities are designed to support. As such, we have a legitimate interest in engaging with our alumni, donors and potential supporters to enable us to achieve these goals.

The processing of your personal data is therefore necessary in order to allow us to achieve these goals.

However, we always ensure that we balance these objectives against your rights and freedoms as an individual, by reviewing our activities regularly for compliance with our ethical and legal obligations.

If you are a student, or have studied at the university, your personal data is transferred from your student record to the university's alumni database when you graduate.

We will update this personal data from time to time. For example, if you provide us with new contact details or change your details on our website or social media sites such as LinkedIn.

We may also update your contact details by using third party sources/services such as Royal Mail NCOA (National Change of Address), when you complete one of our update forms, volunteer your time, attend an event, make a donation, sign up to Beckett Connect, or engage with us in any other way. Where we use third parties to update your contact details, we ensure we have contracts in place to keep your data safe.

The personal data that we will update may include education details; biographical information; contact details; engagement activity; family details; professional activities; business and career details; personal information; and contact preferences.

We may also contact you from time to time to ask you to reconnect with our university.

We also facilitate communications between individual alumni, but in doing so we do not release personal contact details without prior permission.

How we look after your data

LBU will hold the data we collect about you in hard copy in a secure location and on an LBU password protected secure network where held electronically.

Your personal information will be accessed and used only by appropriate, authorised individuals and when this is necessary for the purposes of alumni activity.

Sharing your data

Unless we have a legal obligation to do so, we will not disclose your data to individuals, organisations or other entities outside the university other than those, which are completing tasks and providing services to you on our behalf. Where we share data with third parties and data processors, we have contracts in place to ensure that they understand their responsibilities to keep your data safe. For instance we can organise for you to have a clip showing you crossing the stage at graduation which is a service provided by a third party company called Stage Clip and we have a contract and data sharing agreement in place for the provision of this service.

All UK universities are obliged to give contact details for a sample of recent graduates to the Higher Education Statistics Agency (HESA), and/or an organisation acting on its behalf, your personal data, including contact details, for the purposes of carrying out surveys on the activities and perspectives of graduates.

Further information can be found in the [HESA Privacy Notice](#) which explains that the lawful basis of processing your personal data for this purpose is the performance of a task carried out in the public interest.

Retention of your data

The Alumni team securely holds data on all graduates of LBU and its predecessor institutions to enable and support your lifetime relationship with us and we will retain your data indefinitely unless you request otherwise.

If you ask us to delete your data, we will maintain a skeleton record comprising your name, subject of study, year of graduation, student number and date of birth, to ensure that we do not inadvertently contact you in the future.

If you have donated to the university, we may also need to retain some financial record for statutory purposes, for example, Gift Aid.

Legal basis for processing your data

The law states that we can only process your personal data if the processing meets one of the conditions of processing in Article 6 of GDPR. If we are processing your special category personal data for our activities, we must meet one of the conditions in Article 9 of GDPR. Special Category data includes personal data which relates to your ethnicity, sex life or sexual orientation, health or disability, biometric or genetic data, religious or philosophical beliefs, political opinions or trade union membership. Under the data protection legislation, we need to explain the legal basis for holding your data, i.e. which of these conditions apply.

In general, where we are collecting and processing your personal data for the purposes of alumni activity the following conditions apply:

- **Article 6**

- a) Processing is necessary for the purposes of legitimate interests.
- b) In respect of Higher Education Statistics Agency surveys on the activities and perspectives of graduates, processing is necessary for the performance of a task carried out in the public interest.

- **Article 9**

- a) Explicit consent - The individual has given explicit consent. However, Union or Member State law may limit the circumstances in which consent is available.
- c) Public information - The processing relates to personal data which is manifestly made public by the data subject.

In the case of our legitimate interests to process your personal data, we are required to ensure that our interests are balanced against yours.

There is a legitimate interest in using your information for a number of purposes such as statutory and regulatory compliance, for administration purposes, for internal record keeping, to help us plan our activities and to ensure our communications are relevant and of interest to you.

Therefore, we may use legitimate interest for the following activities:

- maintaining a record of your relationship with the university;
- sending information communications (non-marketing) electronically;
- using publicly available information;
- profiling;
- wealth screening;
- conducting due diligence checks;
- data cleaning (ensuring your contact information is up to date);
- consultations (feedback, census, surveys and questionnaires).

Consent to Alumni Activity

While we will rely on the legitimate interest for processing your data in the first instance, we may also ask for you to consent to other types of communication or to get involved in additional areas.

We will ask for your consent to process your personal data for the following:

- to provide you with information about our work or our activities by email;
- to ask you for your permission to use the story of your experience with the university;
- to ask you to help us raise money or donate money;
- to reclaim Gift Aid from HM Revenue and Customs;
- to facilitate payments made by credit card, direct debit or standing order;
- for wealth screening and research profiling;
- invite you to PG open days;
- for postgraduate studies;
- to invite you to participate in university research;
- to share offers and benefits.

We also facilitate communications between individual alumni, but in doing so we do not release personal contact details without prior permission.

Consent under GDPR needs to be a positive action, so if you have given us your email address in response to a request for alumni details, and/or you have responded to a particular campaign and said you would be interested in similar information, then we may also consider this to be consent. You have the right to withdraw your consent any time.

Updated 1st September 2020