

CORPUS CHRISTI COLLEGE
University of Cambridge

Data Privacy Notice – Alumni, Donors and Supporters

Purpose	The overarching purpose of collecting and processing your data is to keep in touch with you as alumni, donor and/or supporter of the College in order to keep you apprised of activities and to consider ways in which you can help the College through financial and other forms of support. It also enables us to ensure that any approaches we make to ask for your support of our alumni relations or fundraising goals are respectful, professional and relevant to you. The Colleges and the University work closely together to ensure we engage with you in a coordinated manner.		
Responsible Person	Genny Silvanus, College Data Protection Lead & Rachel Lawson, Director of Development and Alumni Relations		
Responsible Committee	Executive Body		
Current Version	1.2	Date	1 February 2024
Approved by	Head of Governance	On	2 February 2024
Next review due	1 February 2025		
Review schedule	Annually, or as needed, by the authors. Minor revisions to be approved by Head of Governance. Executive Body to approve and review every 3 years, and in the case of any substantive change.		
Revision history	A history of revisions to this policy is included at the end of the document.		

Since its foundation in 1352, Corpus Christi College, Cambridge has relied upon friends and benefactors to help realise its key charitable mission as set out in its Statutes: "to maintain and support a college within the University of Cambridge for the advancement of education, research, learning and religion". The College is committed to respecting your privacy and to maintaining your confidence and trust in the way we handle your data. Our principles are simple: we will be transparent about what data we are collecting about you, where that data comes from, how we use the information we hold about you, and what you can do in relation to the data held about you.

The overarching purpose of collecting and processing your data is to keep in touch with you as alumni, donor and/or supporter of the College in order to keep you apprised of activities and to consider ways in which you can help the College through financial and other forms of support. It also enables us to ensure that any approaches we make to ask for your support of our alumni relations or fundraising goals are respectful, professional and relevant to you. The Colleges and the University work closely together to ensure we engage with you in a coordinated manner.

The controller for your personal data is Corpus Christi College, Cambridge, CB2 1RH. The Data Protection Officer for the College is the Office of Intercollegiate Services Ltd [12B King's Parade, Cambridge; 01223 768745; college.dpo@ois.cam.ac.uk]: OIS Ltd should be contacted if you have any concerns about how the College is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement.

If at any point you have questions about our privacy notice, or how we are using your data, please get in touch with us using the contact details below:

Dr Genny Silvanus
College Data Protection Lead
Corpus Christi College
Cambridge
CB2 1RH
dpo@corpus.cam.ac.uk

The legal basis for processing your personal data is that it is necessary for the purposes of our legitimate interests as set out in section 4, 'How your data is used by the College' below.

When substantive changes are made to this statement, the College will publish the updated version on its website and notify you as appropriate.

1. About this Privacy Notice

The purpose of this privacy notice is to explain how Corpus Christi College, Cambridge ("we", "our", "us") hold and use personal data about alumni, donors, and supporters ("you"), and how we use it for alumni and supporter relations, and fundraising purposes. Corpus Christi College, Cambridge's privacy notices relating to other activities and relationships can be found [here](#). The University's privacy policy can be found [here](#).

2. What we do

- 2.1 Corpus Christi College, Cambridge's Development and Alumni Relations team exists to establish and develop lifelong relationships with, and amongst, our alumni, donors, and supporters. We are here to help you stay connected with each other, with the College and with the University. Our communications with you will include news, research developments, events, exhibitions, collections and resources, reunions, volunteering opportunities, fundraising priorities and progress updates that we believe to be of interest to you.
- 2.2 It is only through the remarkable generosity of our donors that the College can continue to carry out its mission of supporting the highest levels of research and teaching.

3. Information we collect

- 3.1 We collect information from you in three ways: directly from you during your ongoing relationship with us and/or with the University of Cambridge; from publicly available sources and, very occasionally, from third parties providing us with services or acting on our behalf. If you are a new contact, we ask you at the outset how you would like to receive news and other communications from us.
- 3.2 **If you are already receiving communications from us, you can change your preferences at any time, including asking us to stop sending you news and other communications completely, by e-mail, post or telephone.**
- 3.3 The data we collect depends on the frequency and nature of your interactions and engagement with us. Information may be gathered across the lifetime of our relationship with you and from many different forms of interaction.
- 3.4 We may hold information relating to you from several sources. A significant proportion of the information we hold on alumni and supporters is that which you provide to us (for example by filling in forms on the College website, booking for functions/events or by corresponding with us by post, telephone, email or otherwise).
- 3.5 Biographical information, which may include:
- name (and previous names), title, contact details (current and previous so that we can keep in touch with you), date of birth, sex, photograph, marital status, spouse, partner and family details;
 - for current or past students: student number, CRS ID, course of study, department, College, matriculation or start date, graduation date, degree conferred;
 - examination results and awards received whilst studying at Cambridge (prizes, scholarships, accolades, bursaries);
 - other education history and professional qualifications;
 - involvement in sports teams, clubs and societies whilst at Cambridge and subsequently;
 - employment details (including salary/salary band), career history, professional activities;

- interests, activities and accolades, including honours, life achievements (when you provide this information, we like to (unless you notify us otherwise) celebrate your achievements);
- profile pictures which come from publicly accessible sources (where copyright allows); and/or
- links to your public social media presence (for example, LinkedIn, Twitter, website or blog).

3.6 Details of our ongoing relationship and your engagement with us, which may include:

- records of your personal interactions with us (for example, correspondence, notes of meetings or conversations);
- your communication preferences;
- records of communications you have received from us, including copies of letters, e-mails or appeal literature sent, and of fundraising activities in which you have been included (for example, annual fund mailings, telephone fundraising campaigns);
- data obtained through cookies and similar technologies such as pixels, tags, web beacons, and other identifiers (these help us understand how you interact with our e-mail communications, websites and other online services we provide – for example, crowdfunding, alumni networking sites; you will find a link to the relevant cookie policy on each of our websites);
- your attendance (and that of your guests) on visits to, or at events across the collegiate University, including details of any payments made, and photographs, audio and video recordings in which you may be included;
- details of benefits and services provided to you, for example, use of College and/or University libraries, Cambridge University Careers Service;
- your connections to other alumni, students, staff, friends, groups or networks, donors and supporters within the collegiate University community;
- membership of College or University social media groups (for example, Facebook, LinkedIn);
- a record of offers of voluntary support you have made, (for example, offers of expertise, advice, mentoring, internships, coaching, accommodation/support for students visiting your area); and/or
- a record of volunteer work you have undertaken.

3.7 Information about your giving, which may include:

- current and past donations and pledges, documentation relating to these gifts and records of the projects you have supported;
- financial information required to process your gifts;
- if you have given it, an indication of your intent to leave a legacy, sometimes including copies of Wills or sections of Wills;
- any requests you have made for anonymity in relation to your giving;
- thank-you letters, donor reports provided relating to gifts you have made, correspondence and
- notes of meetings;

- plans for activities and future interactions;
- records of membership of any societies or groups related to your giving;
- your relationship to friends and patron groups associated with, or providing support to, the collegiate University; and/or
- your relationship to relevant trusts, foundations and corporates (e.g. membership on board of trustees).

3.8 Information relating to your willingness or financial capacity to support our charitable objectives, which may include:

- our understanding of your philanthropic interests, and a note of projects we think may be of interest to you (this understanding may be provided by you or from information in the public domain);
- information about your giving to other organisations, and other support that you provide (e.g. volunteering roles, trusteeships), where this information is given to us by you or publicly reported, and where it helps us to understand your interests and capacity to provide support;
- other information which may give an indication of the scale of any potential philanthropic gift you may be able to give, such as information about earnings and assets, including property, or publicly reported estimates of wealth;
- any estimate we may make regarding the potential scale of your support on the basis of the above information and your previous giving; and/or
- personal recommendations, where made by other supporters, that you may be willing and able to provide support.

3.9 Sensitive personal data, which may include:

- **Health information, including any medical conditions** – we may use health information provided by you so that we can make reasonable adjustments to improve the service that we are able to offer you (e.g. seating or access at an event, dietary requirements, provision of disabled parking, and/or allocation of accommodation). 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 particular circumstances.
- **Criminal convictions, offences, and allegations of criminal activity** – we may use publicly available information concerning criminal convictions and offences or allegations of criminal activity, including money laundering or bribery offences, to carry out due diligence on donors or prospective donors in line with our guidelines on the acceptance of gifts.
- **Race or ethnicity, religious beliefs, sexual orientation, political opinions** – we do not ask for this sensitive data, but they may sometimes be inferred from other data that we hold: for example, your relationships, society memberships, job titles, and/or donations to specific causes or interests.

4. How we use your data

4.1 We collect and process your personal data for the purposes set out below, including:

- Internal reporting and record keeping;
 - Maintaining a record of your academic time at the College and the University of Cambridge;
 - Retaining a formal record of your academic, career or other life achievements;
 - Inviting you to College events that the College believes will be of interest;
 - Providing you with information about the development of the College;
 - Encouraging you to support the College financially and in other ways;
 - Maintaining the College Archive;
 - Providing references on request;
 - The issuing of donor acknowledgments and lists, other ways of stewardship and thanking donors.
- 4.2 Your personal data is used by us for the following purposes in support of alumni and supporter relations, and fundraising.
- 4.3 For alumni and supporter engagement:
- to manage our ongoing relationship with you and to provide a record of your interactions and contributions to College and University life;
 - to offer and manage a varied programme of events tailored to your interests, including networking events, subject reunions, dinners, sports events, concerts, seminars and lectures;
 - to ensure you are aware of the wider programme of events, lectures and seminars taking place across the collegiate University that we believe may be relevant and/or interesting to you;
 - to create seating plans and guest lists (which may be distributed to those attending the event);
 - to keep you up to date with news from your College, department, or other areas in which you have shown an interest (for example by making a donation, attending an event, or becoming a member/friend);
 - to provide you with information about alumni benefits and services, including access to the University of Cambridge Careers Service;
 - to inform you of volunteering opportunities across the collegiate University, including linking current students with alumni for careers advice and internships, or speaking opportunities;
 - to provide the most relevant content and best possible user experience when you are interacting with our digital communications and platforms;
 - to identify and profile potential volunteers, alumni ambassadors and event attendees;
 - to accept and process revenue (for example, for merchandise or event tickets);
 - to undertake surveys and market research;
 - to create classifications and groupings (through manual or automated analyses) in order to facilitate engagement activities; and/or
 - to analyse the success of our engagement activities, collect feedback and manage any complaints.

4.4 For all fundraising and donor stewardship:

- to help ensure that our fundraising efforts are conducted as efficiently as possible, and that our approaches to potential donors are respectful, professional, and made, as far as possible, based on evidence and an understanding of what may interest you;
- to ask you to support our fundraising programmes, consistent with our fundraising promise: <https://www.fundraisingregulator.org.uk/code-of-fundraising-practice/the-fundraising-promise/>;
- to accept and process philanthropic revenue;
- to provide acknowledgement, recognition, and stewardship of your gift;
- to inform you of the impact of your gift;
- to create classifications and groupings (through manual or automated analyses) in order to best direct fundraising activities;
- to support peer-to-peer fundraising campaigns; and/or
- to inform fundraising, marketing and donor stewardship strategies.

4.5 For fundraising for major gifts

- In addition to analysing data shared with us, we may use publicly available information and recommendations from staff and supporters to identify individuals who we believe may have the interest and financial capacity to make a major gift.
- Where we have reason to think a potential donor may possess an interest and financial capacity to donate, we may research and collate additional information from sources in the public domain, typically concerning a potential donor's interests in so far as they may coincide with our work, their philanthropic activity, financial capacity, and networks in order to substantiate this. We may undertake this research ourselves or use the services of a third-party partner. Where we do so, any sharing of your personal data is protected through an agreement with the third party that they may not repurpose it. This new information may be added to the record of a donor or potential donor.
- Where this activity is being undertaken for a new contact with whom we have no previous relationship, we will provide the individual with a link to this privacy notice as part of our initial engagement.
- Information may be collated into a briefing or profile in order to assist the planning of an approach to a potential donor to discuss that individual's interest in our work and in supporting it.
- We may also carry out due diligence on potential donors using publicly available information in order to comply with our policy on the acceptance of gifts, and to fulfil our legal responsibilities.

4.6 For operational reporting, management reporting, and governance

- We may use your personal data for the purposes of operational reporting, to produce management information, and for other relevant purposes relating to the governance of the collegiate University. We will use only the data required and, unless necessary to do otherwise, we will use anonymised or pseudonymised data.

4.7 In our external communications

- With your permission, we may publish your name in an online directory, in donor listings, as part of a guest list, or we may work with you to create press releases or case studies to be included in our publications or on our websites.
- 4.8 If you do not wish your data to be used in any of the ways listed above, or if you have any questions, please contact us at the above-mentioned address.

5. When and how we share your data

- 5.1 We may, from time to time, need to share your personal data within the collegiate University of Cambridge or with third parties working on our behalf. We will only do this in appropriate circumstances, by secure means, and with the relevant data sharing agreements in place. We do not, and will not, sell your data.
- 5.2 Third parties will only process your personal data on our instructions and where they have agreed to treat your data confidentially and to keep it secure. We only permit them to process your personal data for specified purposes. We do not allow our third-party service providers to use your personal data for their own purposes nor to keep your data after the processing is complete. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies.
- 5.3 Whenever your information is shared, we will always seek to share the minimum amount of information necessary to fulfil the purpose, which may mean using only anonymised or pseudonymised data.
- 5.4 Your data may be shared in the ways described below.
- 5.5 Within the collegiate University of Cambridge:
- We believe that most alumni understand in detail the complex and many interactions of the College with the University of Cambridge. The personal data of College members is shared with the University routinely throughout any course of study. This collaborative working continues thereafter.
 - We will do this only where it is necessary in order to carry out any of the purposes listed in this privacy notice. For example, where the University is coordinating with one or more Colleges to organise shared events to which you are invited; to manage and coordinate relationship management activities with you; or to ensure your contact information and communication preferences are up to date.
 - We may also share relevant data, in appropriate circumstances, with College or University Sports Clubs and Societies where you are (or were) a member of that club or society.
 - The University and its partners (including the College) have a data sharing agreement to govern the sharing of personal data of alumni and other supporters. This is necessary because they are distinct legal entities. The agreement outlines that, depending on constraints set by you, and which you may change at any time, the University and College may share any of the above categories of personal data with the University, and can be viewed in full at <https://www.ois.cam.ac.uk/policies-and-protocols>. Any transmission of

data to or from the University is managed through agreed processes which comply with UK data protection legislation.

- The University has its own data protection statement and procedures, which are available at <https://www.alumni.cam.ac.uk/data-protection>.

5.6 With organisations or individuals affiliated to Corpus Christi College, Cambridge:

- We often have requests from individuals (for example, alumni/Fellows) to reconnect with members of College with whom they have lost touch. We like to facilitate this communication, but in doing so we do not release personal contact details without prior permission.
- We also benefit from a network of organisations and individuals who volunteer their support to the College. We may share relevant data with them, in appropriate circumstances, by secure means, and with the relevant data sharing agreements in place. These may include:
 - Volunteers offering their expertise by serving on boards or otherwise advising on or assisting with alumni or development matters;
 - Recognised College or University alumni societies and networks, for example when they are helping to organise a dinner or host an event to which you are invited.
- When organisations or individuals volunteer their support, we may, at their request and with their permission, share their personal contact details, to facilitate the agreed activity which they are coordinating.

5.7 With partner organisations that accept gifts in support of Corpus Christi College, Cambridge:

The following organisations enable tax-efficient giving to Corpus Christi College, Cambridge, and the collegiate University of Cambridge, from outside of the UK. Your data may be shared by us with these organisations where it relates specifically to donations you have made or have pledged to donate via these organisations.

- **Cambridge in America (CAm)** accepts gifts in support of the collegiate University of Cambridge. CAm has been determined by the United States Internal Revenue Service to be a tax-exempt public charity. The personal data you provide when making a gift to CAm are collected and processed by CAm using the Cambridge University Amicus System. Recognised College or University alumni societies and networks, for example when they are helping to organise a dinner or host an event to which you are invited.
- **Cambridge in America (UK) Ltd (CAm UK)** accepts gifts in support of the collegiate University of Cambridge. CAm UK is a registered charity in the UK. The personal data you provide when making a gift to CAm UK are collected and processed by CAm UK using the Cambridge University Amicus system.

5.8 With third-party organisations engaged by Corpus Christi College, Cambridge to provide services:

These include but are not limited to:

- mailing houses, printers, event organisers or venues (including selected companies who provide College-branded or College-endorsed products and services);

- organisations providing tools such as relationship- or event-management systems; databases and reporting/analysis tools; alumni networking or crowdfunding platforms; email or survey tools; payment services (e.g. direct debit, online donation processing);
- organisations assisting with activities such as market research, marketing and communications, organisational effectiveness, strategy and planning, auditing, business intelligence and analysis, customer experience.

6. How we protect your data

6.1 The College takes precautions to safeguard your personal information against loss, theft and misuse, unauthorised access, disclosure, and destruction through the use of appropriate administrative, physical and technical security measures.

6.2 **Where you have provided us with your credit or debit card information**, over the telephone, or on a printed giving form, that data is stored securely and destroyed after your payment has been processed. Bank details used for processing Direct Debits are stored under the [Direct Debit Guarantee scheme](#). Online donations are processed via our third-party payment service providers and your credit or debit card information is not collected or stored by us.

6.3 **Transfers of your data outside of the European Economic Area (EEA)** - although most of the information we collect, store and process is stored on servers located within the UK, some information may be transferred to other countries outside of the EEA. This may occur if, for example, one of our third-party partners' servers are located in a country outside of the EEA.

6.4 Transfers outside of the EEA will only take place if one of the following applies:

- the country receiving the data is considered by the EU to provide an adequate level of data protection;
- the organisation receiving the data is covered by an arrangement recognised by the EU as providing an adequate standard of data protection (e.g. transfers to companies that are certified under the EU US Privacy Shield);
- the transfer is governed by approved contractual clauses;
- the transfer has your consent;
- the transfer is necessary for the performance of a contract with you or to take steps requested by you prior to entering into that contract;
- the transfer is necessary for the performance of a contract with another person, which is in your interests;
- the transfer is necessary in order to protect your vital interests or of those of other persons where you or other persons are incapable of giving consent;
- the transfer is necessary for the exercise of legal claims; and/or
- the transfer is necessary for important reasons of public interest.

7. How long we keep your data

7.1 The College considers its relationship with alumni, donors and supporters to be life-long, and we will retain much of your data indefinitely unless you request otherwise (you have

the right to request at any time that we delete personal data that we hold). When determining how long we should retain your personal data we take into consideration our legal obligations and tax or accounting rules. If you have pledged a legacy gift, it will be necessary to retain your data until your gift is received, so that we can identify the gift against that pledge. When we no longer need to retain personal information, we ensure it is securely disposed of. We may keep anonymised statistical data indefinitely.

8. The legal basis for processing your data

8.1 We will only use your personal data where the law allows us to do so. Most commonly we rely on the following legal bases for processing your personal data:

- Where we have a **legitimate interest** to do so for purposes listed within this privacy notice. It is a requirement by law to identify the category of association we have with you that justifies the data we hold, and we consider you to be a life-long member of the College and therefore interested in continuing your relationship with us. Where we use legitimate interest as the basis for our processing, we have carefully considered each of the ways we process your data to ensure that we carry out our activities with a focus on the interests of our alumni, donors and supporters, and in the most efficient and effective way.
- Where we need to **perform any contract** that we have entered into with you. Information processed for this purpose includes, but is not limited to, the information you provide when you register for an event, or to enable us to process a donation.
- Where we are required to comply with our legal obligations, such as for: reclamation of Gift Aid on your donations; statutory returns to the Office for Students (OfS), the Charity Commission or ICO; participation in the HESA Graduate Outcomes Survey; responses to the Charity Commission or ICO in relation to audits or official investigations; responses to FOI Requests, under the Freedom of Information Act 2000.
- Where your **consent** is required, for example where sensitive personal data is recorded. You can withdraw your consent at any time, and we will stop any processing of your personal data requiring your consent. See: “Your legal rights and choices in connection with your personal data” below.

8.2 We will only process your personal data for the purposes for which we collected it, and where we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose. Please note that we may process your data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

9. The legal basis for processing your data

9.1 Under certain circumstances, by law you have the right to:

- **Request access to your personal data** (commonly known as a “subject access request”). This enables you to receive a copy of your data and to check that we are lawfully processing it.
 - **Request correction of your data.** This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
 - **Request erasure of your data.** This enables you to ask us to delete or remove your 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 data where you have exercised your right to object to processing (see below).
 - **Object to processing of your data** where we are processing it meet our public interest tasks or legitimate interests (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. You also have the right to object where we are processing your data for direct marketing purposes.
 - **Request the restriction of processing of your data.** This enables you to ask us to suspend the processing of your data, for example if you want us to establish its accuracy or the reason for processing it.
 - **Request the transfer of your data to another party.**
- 9.2 Depending on the circumstances and the nature of your request it may not be possible for us to do what you have asked, for example, where there is a statutory or contractual requirement for us to process your data and it would not be possible to fulfil our legal obligations if we were to stop. However, where you have consented to the processing, you can withdraw your consent at any time by emailing the [Alumni and Development Office](#). In this event, we will stop the processing as soon as we can. If you choose to withdraw consent it will not invalidate past processing.
- 9.3 If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, please contact the [College Data Protection Lead](#). We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.
- 9.4 You have the right to lodge a complaint about the College’s management of your personal data with the Information Commissioner’s Office at <https://ico.org.uk/concerns/>.

10. Contact us

If you have any questions about this privacy notice or about your personal data, or exercise any of your rights as outlined above, please contact us at the following address:

Dr Genny Silvanus
College Data Protection Lead
Corpus Christi College
Cambridge
CB2 1RH

dpo@corpus.cam.ac.uk

If you want to provide updates to your data or make any changes to your communication preferences, please contact:

Alumni and Development Office
Corpus Christi College
Cambridge
CB2 1RH

development@corpus.cam.ac.uk

11. Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time. Any changes to this privacy notice will be posted to this page.

Revision history

Version	Responsible Person	Summary of changes	Review date	Approved by	Approval date
1.0	Genny Silvanus, College Data Protection Lead & Rachel Lawson, Director of Development and Alumni Relations	Initial Notice	07 October 2022	Executive Body	27 October 2022
1.1	Genny Silvanus, College Data Protection Lead & Rachel Lawson, Director of Development and Alumni Relations	None	19 October 2023	Head of Governance	19 December 2023
1.2	Genny Silvanus, College Data Protection Lead & Rachel Lawson, Director of Development and Alumni Relations	Addition of bullet point under 5.6 detailing requested voluntary sharing of contact details of volunteers	1 February 2024	Head of Governance	2 Februar 2024