

Data Protection Policy **Development Office** **Alumni, Friends, and Resident Students**

The controller for your personal data is King's College, King's Parade, Cambridge, CB2 1ST. The Data Protection Officer for the College is the Office of Intercollegiate Services Ltd (ISL), 64 Bridge Street, Cambridge CB2 1UR; 01223 768745; college.dpo@ois.cam.ac.uk. ISL 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. The person within the College otherwise responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data, is the Freedom of Information Officer, foi@kings.cam.ac.uk.

This statement explains how King's College ("we" and "our") collects and uses data we collect about alumni, current students and other supporters ("you" and "your"). In broad terms, we use your data to manage the ongoing relationship between the College and you as part of our lifelong community of scholars, including keeping in touch with you and maintaining your engagement with and contribution to College life and the King's community.

We will retain your data indefinitely or until you request us to do otherwise. When changes are made to this statement, we will publish the updated version to our website and notify you by other communications channels as we deem appropriate or necessary.

The legal basis for processing your personal data is that it is necessary for the purposes of our legitimate interests, where we have concluded that our interests do not impact inappropriately on your fundamental rights and freedoms, except where in this statement we have indicated otherwise. You may ask us to explain our rationale at any time.

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1. How your data is used by the College

Your data is used by us for a number of interdependent purposes, including alumni relations, communications and fundraising. These include:

- publications (e.g. *King's Parade* magazine and *King's Herald* online newsletter),
- surveys, to help us direct and refine our activities, appeals and requests for donations, including an evaluation of when and whether particular appeals may be appropriate or of interest to you,
- the promotion and execution of social and academic College events safely and for the benefit of all who are present,
- ensuring donations are accepted and used appropriately, and
- the promotion of other services and benefits open to our members.

Communications to you may be sent by post, telephone or electronic means, depending on the contact details we hold and the preferences expressed by you about the types of communications you wish to receive.

If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at members@kings.cam.ac.uk.

2. What data is held by the College

We believe that most alumni understand the fundamental necessity of interaction between the College and the University of Cambridge. Personal data of our members is shared with the University routinely throughout any course of study, and it is our strong preference to continue such collaborative working thereafter.

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 www.cam.ac.uk. Any transmission of data to or from the University is managed through agreed processes which comply with UK data protection legislation.

For clarity, the College has a separate database from the University, but has access to the University's database: additionally, we maintain other electronic and paper records.

The University has its own data protection statement and procedures – see <https://www.alumni.cam.ac.uk/data-protection>

Most records contain:

- basic details of your school, College and University education,
- unique personal identifiers (e.g. student ID number, date of birth), and
- your contact details.

Where provided by you, or provided by the University or obtained from reputable sources, we also may record:

- your attendance at College or University events,
- other contact with us or the University since graduation,
- your key relationships with other alumni or supporters of the College and/or the University and other colleges within Cambridge,
- your career highlights and other life achievements,
- financial information relating to you and any of your key relationships (including but not necessarily limited to income, philanthropy and other giving),
- information in the public domain that is relevant to the College's legal obligations and reputation,
- donations made by you to either the College or the University,
- information about your areas of personal interest (e.g. clubs, hobbies, voluntary work),
- personal data provided by you for a specific purpose or purposes (for example, disability, catering preferences or lifestyle status for event management), and
- your communication preferences.

Where data is included from sources external to the University and the College, we only use data from our partners (as outlined below) or other reputable sources. We may use automated or manual analyses to link data together to help us assess your potential for supporting us and/or the University.

2.1 Student Records

While not alumni until leaving residence or graduation, many students are involved with the work of the Development Office during their time at King's. Examples are:

- beneficiaries of a stewarded scholarship/studentship/etc
- students as donors to the College
- attendance at alumni events
- working for the Development Office (telephone campaign, data entry, summer placement)
- entering the Entrepreneurship Competition

As such, basic records for all resident students are held by the Development Office, typically from matriculation or entry to the College, and based on information provided by the University CAMSIS database, and by the Tutorial Office. This helps us:

- ensure we don't neglect students who matriculate, but don't graduate (we still consider these students to be alumni), and visiting students who neither matriculate nor graduate,
- better manage subject-based events, in order to approach specific individuals or groups of students on behalf of Fellows,
- better identify KCSU, KCGS, KCBC and club/society officers that we may work with and support student events or communications to alumni.

Student records held by the Development Office will typically include:

- Names, date of birth, University ID for CAMSIS
- Contact details (College box number and @cam email address)
- Subject of study, and degrees awarded
- Membership of clubs, societies, and roles performed there or KCSU/KCGS
- Notes of any of the activities mentioned above

Unless provided voluntarily by the individual student, the Development Office does not hold:

- Data on health, sexual preference, race, religion or political preference
- Data on academic performance, student finances, or disciplinary issues
- Data on hardship awards, including College and University sources of funding

3. When the College shares your data with others

Depending on constraints set by you, and which you may change at any time, we may share any of the above categories of data with the University of Cambridge.

Additionally, we share data on a considered and confidential basis, where appropriate, with

- Cambridge in America (the University's affiliate alumni office in the US);
- third party agencies who provide us with data in the public domain about alumni and supporters, examples of which are:
 - UKChanges, for verification of contact details, National Change of Address

- database, deceased status, Telephone Preference Service lookup
- contractors providing services to you on our behalf or services to us (our “data processors”), examples of which are:
 - HMRC, for Gift Aid claim and audit
 - Peters, Elworthy & Moore, College Auditors
 - Barclays Bank plc, for financial transactions including credit card payments for donations and events
 - The Charities Aid Foundation (CAF), for the receipt of online donations and direct debit processing
 - Buffalo Fundraising Consultants Ltd, for fundraising consultancy and the delivery of the annual Telephone Campaign and Giving Day
 - Mailchimp, for the processing and dispatch of bulk email communications, including *King's Herald*
 - Blackbaud Inc, the vendor of our contact management database, for technical support purposes only
 - TicketTailor, when we organise events (including those you pay for)
 - firstMailing Co Ltd, of Huntingdon, for the enclosure and delivery of the *King's Parade* magazine
 - SurveyMonkey Inc., for the collection of survey data and opinion to guide our alumni relations and fundraising programmes

We do not sell your personal data to third parties under any circumstances, nor permit third parties to sell-on the data we have shared with them.

We also facilitate communication between individual alumni (of the College or the University), but in doing so we do not release personal contact details without prior permission.

Any transfers of your data overseas or to international organisations, as set out above, are protected either by an adequacy decision by the European Commission or by the EU-US Data Privacy Framework (with UK Extension).

4. Your rights

You have the right: to ask us for access to, rectification or erasure of your data; to restrict processing (pending correction or deletion); to withdraw from communications or direct marketing we may send to you; and to ask for the transfer of your data electronically to a third party (data portability). Some of these 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.

If you were a student at King's please see the [Data Protection Statement](#) about student records which lists the information which the College processes in the course of its legitimate interests as a place of education. Education is one of the College's core functions, student records are a longstanding part of its historic records, and section 89 of the EU GDPR (which is part of UK data protection legislation) is likely to be invoked as an exemption in support of declining certain requests 'to be forgotten'.

Where you opt out of all future communications or exercise your right to erasure, we will continue to maintain a core set of personal data (name, subject(s), matriculation and graduation details, unique University identification number and date of birth) to ensure we do not contact you inadvertently in future, while still maintaining our record of your academic achievements. We may also need to retain some financial records about you for statutory purposes (e.g. Gift Aid, anti-fraud and accounting matters).

You retain the right at all times to lodge a complaint about our management of your personal data with the Information Commissioner's Office at <https://ico.org.uk/concerns/>

5. Questions and further statutory information

Except in some of the cases above where we share data with other data controllers, the controller for your personal data is King's College.

Development-specific enquiries about our data policies, procedures, and your personal data and communication preferences can be directed to members@kings.cam.ac.uk.

Please contact us through the addresses given above if you have any concerns or questions about the above information. Where you have specific requests relating to how we manage your data, we will endeavour to resolve these, but please note that there may be circumstances where we cannot comply with your specific request.

If you have any concerns about your personal data held by the University, please contact the University separately.

Document Details		
Responsible Officer	First Bursar (via the College Data Protection Lead)	
Original Date	May 2018	
Next Review Date	April 2028	
Version Control		
Version No.	Approval Date	Change Description
1	2018/05/01	Original approval by Council
1.1	[2018/06/12]	Updated list of third-party contractors with whom we share data.
1.2	2018/10/11	Updated list of third-party contractors.
1.3	[2021/03/05]	Updated list of third-party contractors and added student records processed by Development.
1.4	[2021/05/06]	Updated list of third-party contractors.
2	2022/05/03	Added screening of potential donations and updated list of third-party contractors.
3	2025/04/29	Enhanced events section under 'use' and added risk mitigation to 'data held' section. Updated the method of compliance when sharing data outside the UK. Clarified 'opt out' rights. Clarified that some sharing is with other data <i>controllers</i> . Transfer of existing policy to pro-forma with minor wording and layout amendments.
3.1		Update DPO address and company name.