

Peterhouse Data Protection Statement – Petreans and other supporters

How we use your personal information

This statement explains how Peterhouse (“the College”, “we” and “our”) handles and uses data we collect about Petreans and other supporters (“you” and “your”). In broad terms, we use your data to manage the ongoing relationship between you and the College as part of our lifelong community of scholars, including keeping in touch with you, keeping up to date on your achievements, and engaging with you on how you can continue to be part of the life of the College and otherwise support it.

We will retain your data indefinitely. However, at your request we can archive it and prevent access to it for 100 years. When changes are made to this statement, we will publish the updated version to our website and notify you by other communications channels as appropriate or necessary.

The controller for your personal information is Peterhouse, Trumpington Street, Cambridge, CB2 1RD. The Data Protection Officer for the College is the Intercollegiate Services Limited [64 Bridge Street, Cambridge; 01223 768745; college.dpo@ois.cam.ac.uk]. Should you have any questions or concerns about how we manage your personal information or if you require advice on how to exercise your rights as outlined in this statement you should contact the College Data Protection Lead in the first instance (dpl@pet.cam.ac.uk). The Fellow in the College otherwise responsible for data protection and for monitoring compliance with relevant legislation in relation to the protection of personal data is the Senior Information Risk Officer [siro@pet.cam.ac.uk]. If you continue to have concerns then you should contact the ISL.

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 elsewhere in this statement we have indicated otherwise. You may ask us to explain our rationale at any time.

How your data is used by the College

We collect and process your personal data for a number of purposes, including:

- A. maintaining a formal record of your academic, career or other life achievements for the benefit of our historical archives and in order to promote the reputation of the College, and help you to network with other College members effectively;
- B. inviting you to College and University events that we believe will be of interest to you, including alumni events, volunteering opportunities, and other ways you can contribute to the life of the College;
- C. providing you with information about developments at the College, including major initiatives and programmes relating to either the academic endeavour or the provision of services and facilities to members;
- D. inviting you to make a financial contribution to the College and/or the University, and processing any such contributions;
- E. assessing your interest in making a financial contribution (gift) to the College, now or in the future;
- F. carrying out due diligence on donors in line with our Gift Acceptance Policy and to meet money laundering regulations.

Further details are provided in the Annex below. If you have concerns or queries about any of these purposes, or about how we communicate with you, please contact the Development Office at develop@pet.cam.ac.uk.

Communications

As a member of the College, you will automatically receive news and other communications from us, but you are able to change your preferences (or ask us to stop sending you news and other communications completely) by contacting the Development Office (develop@pet.cam.ac.uk). You may request changes at any time.

How we share your personal data

We believe that most Petreans understand in detail the complex and many interactions of the College with 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 Petreans and other supporters. This is necessary because they are distinct legal entities. The agreement outlines that, depending on constraints set by you which you may change at any time, the University and College may share any of the above categories of personal data (excluding financial data); it and be viewed in full at <https://www.ois.cam.ac.uk/policies-and-protocols/data-sharing-protocols/>. 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>.

Additionally, where appropriate, we share data on a considered and confidential basis 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 Petreans and supporters, as outlined above,
- volunteer partners closely related to us (e.g. College trustees, alumni group representatives), and
- contractors providing services to you on our behalf or services to us (our "data processors"), as outlined above.

In the case where the College needs to obtain legal advice in order to carry out its normal business in relation to an issue involving a Petrean, the College may share relevant personal data with its lawyers, but will only do so to the extent that it considers necessary in the circumstances.

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 standard data protection clauses adopted by the European Commission (which are available from our Data Protection Officer).

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 object to communications or direct marketing; 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.

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).

If you have any questions about how your personal information is used, or wish to exercise any of your rights, please contact the CDPL dpl@pet.cam.ac.uk in the first instance. If you are not happy with the response from us, you may contact the statutory Data Protection Officer, college.dpo@ois.cam.ac.uk.

You retain the right at all times to lodge a complaint about our management of your personal information with the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, or via their website, <https://ico.org.uk/concerns/>.

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ANNEX

We collect and process your personal data, as specified below, for a number of purposes, including:

- A. retaining a formal record of your academic, career or other life achievements and progress in order to promote and improve the reputation of the College and help you to network with other College members effectively

We retain personal data (provided by you), including:

- i) your current name and any previous names you have had;
- ii) unique personal identifiers (e.g. student number, CRSID, date of birth, photograph);
- iii) your current and previous contact details;
- iv) matriculation and graduation details, including photographs, and records of your academic qualifications (including those prior to becoming a member of the College);
- v) other details of your academic progress or achievement (e.g. College or University awards or prizes);
- vi) details of your achievements since you completed your course(s) of study;
- vii) membership (including photographs) of College and external clubs and societies (including alumni groups);
- viii) your previous and current employment status (including retirement), including job title, sector, and work contact details, dates of employment

When you provide this information, we will assume (unless you notify us otherwise) that we can promote these achievements in our public literature, and can use this information for other purposes outlined in this statement. We may supplement information from other public sources that we consider to be reliable (e.g. your public social media profile(s), King or Queen's Honours List, Companies House, high profile news reports or articles) and may check their accuracy with you from time to time.

- B. engaging you in College and University events that we believe will be of interest to you, including alumni and open events, volunteering opportunities, and other ways you can contribute to the life of the College

We retain personal data (provided by you or by the University of Cambridge, or created by us), including:

- i) known relationships with other members (past or present) of the University of Cambridge or any of the Colleges;
- ii) your previous attendance at College or University events;
- iii) information about your areas of personal interest;
- iv) personal data relating to your attendance at events and your personal preferences (e.g. dietary or accommodation requirements or requests);
- v) records of any communications (verbal or written) we have had with you, including the purpose and outcome of those communications.

When you provide this information, we will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement. We may supplement information from other public sources that we consider to be reliable (e.g. University publications, high profile news reports or articles) and may check their accuracy with you from time to time.

- C. providing you with information about the development of the College, including major initiatives and programmes relating to either the academic endeavour or the provision of services and facilities to members and the wider public

We retain personal data (provided by you or by the University of Cambridge, or created by us), including:

- i) any communication preferences confirmed by you;
- ii) ways in which you have supported the College.

By providing us with email addresses and telephone numbers, we have taken this to be consent to use those channels to contact you for this and other purposes outlined in this statement, unless you have outlined to us your preferred communication channels. When you provide this information, we will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement.

D. inviting you to make a financial contribution to the College and/or the University, and processing any such contributions

The College's income consists of gifts and benefactions, income derived from prudent investment of any endowment and student fees. We value any financial contribution from our members and, accordingly, retain personal data (provided by you or by the University of Cambridge, or created by us), including:

- i) the purposes and amounts of any donations or other support you have given to the College;
- ii) the method(s) of payments used and related payment references;
- iii) your bank details (for processing direct debit or other financial transactions);
- iv) your tax status and Gift Aid declaration.

Some of this financial information needs to be retained for statutory purposes for a number of years (e.g. Gift Aid, anti-fraud and accounting matters). When you provide this information, we will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement.

E. assessing your interest in making a financial contribution (gift) to the College, now or in the future

This results in us creating personal data including:

- i) your potential interest in making a gift, including our internal classification of you as a major gift prospect which is determined by a combination of *your giving history, your attendance at College and University events, and your other interactions with the College since you graduated, including any positive or negative indications from you about your capacity or willingness to give to the College; gifts you have made to other charitable organisations*

Our research includes incorporating information from public sources that we consider to be reliable (e.g. your public social media profile(s), King's or Queen's Honours List, Companies House, high profile news reports or articles). In using these sources, we always consider the potential intrusion of your privacy. This research helps us to focus conversations we have with you about fundraising and volunteering in the most appropriate way and to exclude you from unwelcome or inappropriate approaches so as not to compromise your ongoing relationship with us.

We may use external contractors or consultants such as Prospecting for Gold to assist us in this research. We may also carry out wealth screening to fast track the research using our trusted third party partners. Where we do so, any sharing of your personal data is on the strict understanding that they may not repurpose it, or pass it on to other third parties. We do not sell your personal data under any circumstances.

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

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