



## **GOODENOUGH COLLEGE DATA MANAGEMENT POLICY: EXTERNAL PARTNERS**

Goodenough College is committed to protecting its partners' personal information and maintaining transparency about the information held, whether they are a College applicant, Member, Fellow, alumnus or other partner or stakeholder.

This policy, which complements the College's Data Protection Policy, applies specifically to information held about Alumni, donors, other supporters and organisations with links to the College. It has been developed to ensure that the College and all of its subsidiaries fully comply with data protection laws in the UK (General Data Protection Regulation) in the collection, handling and disposal of its partners' personal information. All personal data is held and processed in accordance with those data protection laws.

This policy describes how the College collects, manages and uses individuals' personal information on our database.

### **What personal data the College collects**

Developing a better understanding of our community through their personal data enables the College to curate relationships more effectively. Data held and processed by the College's Development and Alumni Relations Office may include, as relevant:

- biographical information, including name, title, gender, nationality, date of birth, partner/spouse/family and other relationships;
- contact details, including address, email addresses and phone numbers;
- educational history from before and after residence at Goodenough College;
- information about time at the College (e.g. clubs, societies, hobbies and scholarships);
- employment details, including employment history, professional activities and other biographical details provided directly or available via public sources;
- relationships with other alumni, supporters and friends;
- current interests, activities and affiliations;
- responses to fundraising appeals and proposals, other donation history, Gift Aid status;
- extracts from media stories (e.g. online articles and interviews) and information publicly shared on social media, including, but not limited to, services such as LinkedIn, Facebook and Twitter;
- records of communications and interactions with the College and its service providers;
- attendance at events and meetings with Goodenough staff;
- communication preferences.

The College does **not** collect or store:

- credit/debit card and/or bank details;

- information on political beliefs, sexual orientation, religious beliefs, trades union membership or legal history.

## How the College collects personal data

- **Information partners share personally.** Those who become Members of the College provide personal details. On their departure, the College retains this data indefinitely in support of the Members' lifelong relationship with the College, unless/until asked to do otherwise. All Alumni have access to the Goodenough online Alumni community website, Goodenough Global, enabling them to update, amend and control their personal information at any time. The College updates its records when informed of changes. The College also holds information on non-alumni friends of the College, donors and potential donors, again where these partners themselves have shared information with the College.
- **Information from our service providers.** The College may also use service providers to conduct research and gather information to ensure accuracy and efficiency in our annual fundraising activities, such as our Giving Day.
- **Information from The Goodenough on Mecklenburgh Square.** Our 4-star hotel, which provides discount rates for Goodenough Alumni, alerts the College when Alumni stay there so we can reconnect with them and welcome them back to Mecklenburgh Square.
- **Information shared by the London Goodenough Association of Canada (LGAC),** our registered non-profit organisation which exists to support the Canadian Goodenough Alumni community.

For the purpose of fundraising and to help the College better understand partners' interests, preferences and the type and level of donation they may be interested in giving, the College may use additional information, such as measures of affluence and interest in charitable causes, where available from external sources. This allows the College to make appropriate requests to supporters and prospective supporters.

There is no statutory or contractual requirement for partners to provide the College with any personal data. Any personal data stored in our database is held on the College's secure servers, with access restricted to authorised personnel only.

## How the College processes personal data

The College relies on legitimate interest, as cited in the General Data Protection Regulations (2018), Article 6(1)(f), for much of its processing of personal data. Legitimate interest enables the College to assume partners' interest in receiving communications, unless/until they indicate otherwise, as a result of partners' ongoing relationship with the Goodenough College community. This includes communication by post or telephone. For email communications, the College relies on implied consent as per the Privacy and Electronic Communications (EC Directive) Regulations 2003, arising from the provision of partners' email addresses on joining the College and the Goodenough community.

The College communicates with its partners only in the ways that they choose. It will not contact partners if they have indicated that they do not wish to be contacted. To ensure that College communications are relevant to partners and their interests, communications may be targeted to particular audiences. Such communications include:

- the circulation of publications (Goodenough News) and our enewsletter (The Goods);
- the conduct of surveys;
- the offer of services, such as the Goodenough Global website;

- fundraising proposals and appeals for donations;
- invitations to College and Alumni events;
- promotion of other opportunities and services available to you (i.e. offers available through the Alumni network groups).

The College's partners have the right formally to request copies of the data the College holds on them at any time. This request, known as a Subject Access Request, can be made verbally or in writing. It is recommended to make such requests in writing to provide a clear trail of correspondence. Please email [alumni@goodenough.ac.uk](mailto:alumni@goodenough.ac.uk) for further information.

## **What personal data the College shares**

The College may share partners' personal information:

- with other Goodenough subsidiary bodies, such as The Goodenough on Mecklenburgh Square and The Burn;
- with trusted service providers with whom the College collaborates for charitable purposes, such as technical service providers who send emails or process donations, and companies who conduct wealth screening. The College undertakes careful checks of these companies before collaborating with them, and clear contracts set out our expectations and requirements in handling personal data;
- to facilitate communication between individual Alumni (although the College never releases personal contact details without prior permission);
- with the London Goodenough Association of Canada (LGAC) regarding Alumni who have told us they are Canadian nationals or who are currently living in Canada. The LGAC uses this data to run an Alumni programme for Canadians and Canadian residents. It is a registered non-profit organisation that exists to support the Canadian Goodenough Alumni community. There is a data-sharing agreement in place to ensure LGAC complies with UK data protection standards. LGAC does not share this personal data with any other organisations;
- to process tax efficient international donations: there are tax efficient ways to donate for partners who are tax payers in the US, Canada and Hong Kong. The College needs to share donors' details with service providers to process these transactions effectively via secure international channels.

The College will never share, sell or swap partners' personal data with any other organisation for their own purposes.

The College may ask to publish donors' names in our literature; all donors are offered the option to remain anonymous.

## **How long the College holds personal data**

Goodenough College considers its relationship with its Alumni and donors to be life-long, and accordingly holds individuals' personal data indefinitely. Those partners who choose no longer to stay in touch should simply request that the College delete their data. In which case, the College will simply retain the individual's name and academic course details to ensure that no new record is inadvertently created in the future. The College may need to retain some financial records for statutory purposes (i.e. Gift Aid, anti-fraud and accounting matters). College partners have the right to opt out of their personal data being processed for marketing and fundraising purposes at any time. Please email [alumni@goodenough.ac.uk](mailto:alumni@goodenough.ac.uk) to state your preferences.

## **Changes to this data management policy**

The College may at any time update these terms and conditions, in continuing compliance with General Data Protection Regulations (2018). It will notify partners of any significant changes in the way it treats personal information by sending a notice to the primary email address provided by partners and/or by placing a prominent notice on the College website. By continuing to use the website, partners will be deemed to have accepted such changes.

## **Comments**

The College values partners' involvement, which enables the College to develop its community and nurture its friendships. If you have a comment or concern about the way the College treats your personal data, please contact our Data Protection Officer on [alumni@goodenough.ac.uk](mailto:alumni@goodenough.ac.uk).

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