

## **RVC Alumni Privacy Notice**

A privacy notice is a statement that discloses some or all of the ways we as a 'Data Controller': gather, use, disclose, and manage your personal data.

### **What is a 'Data Controller'?**

The Data Controller is the body – in this case the RVC – that determines the purposes for which and the manner in which any personal data are, or are to be, processed.

### **What is 'personal data'?**

Under UK Data Protection Law "Personal data" means any information relating to an identified or identifiable living individual. "Identifiable living individual" means a living individual who can be identified, directly or indirectly, in particular by reference to (a) an identifier such as a name, an identification number, location data or an online identifier, or (b) one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

### **What is a 'data subject'?**

A 'data subject' is a natural living person whose personal **data** is processed by a **controller** or processor. So when we hold and process personal data about our clients they are 'data subjects'.

### **What is 'Special Category Data'?**

The law provides a separate definition for "Special Category Data". This relates to information concerning a data subject's racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences. You can expect the RVC to put in place additional safeguards when processing any Special Category Data that we obtain from you and to ensure that we have a robust legal bases for doing so.

### **This Privacy Notice and the RVC's data protection obligations under UK Data Protection Law.**

One of our responsibilities is to tell you in more detail about the different ways in which we use your personal data. This Privacy Notice is designed to provide further information about these uses.

In addition to the information in this notice, you may be given further information about the uses of your personal data when you use specific services and facilities offered by the RVC.

The RVC will use your personal data to carry out the necessary tasks for the administration and management of your status as an Alumnus of the Royal Veterinary College. This will include your contact details, educational details, details of clubs and societies you engaged with during your time at the RVC, and history of your contact with the RVC. It may also include details of your employers, your salary level and your networks and interests as well as a record of your consent to be contacted by the RVC for a range of purposes which may include: events or clinical services relevant to the care and treatment of animals, requests to take part in research studies in support of veterinary medicine, or communications from the RVC's Animal Care Trust - the charity that supports our activities. In certain circumstances we may be obliged to share your information with third parties such as the police or courts.

In doing so the RVC is defined as a **Data Controller** in UK Data Protection Law and this means that we are legally responsible for the personal data we collect and hold about you.

## **Our legal bases for processing your personal data**

The legal basis for processing your personal data in the first instance is that of our *legitimate interests* as a provider of higher education with a focus on professional formation and continued career development. Where our *legitimate interests* form the legal basis to process your personal data we are required to ensure that our interests are balanced against any detriment you may face from our processing.

Where we are processing your data for purposes for which we have sought your consent (e.g. marketing, research) then the legal bases for processing that data is the *consent* that you have provided.

If we are processing your data in relation to the research activities of the RVC then the legal bases will be *consent*.

If we are obligated to share your personal data with the police or the courts then having confirmed that there is a legitimate bases for sharing we will do so on the bases of *legal obligation*.

Where we share information with third parties for the purposes of marketing and administering the Alumni Relations then legal bases will be *legitimate interests*. These third parties will be considered Data Processors and we will ensure that they are compliant with their obligations under UK Data Protection Law.

## **How do we obtain your personal data?**

### **When you give it to us directly**

You may give us your information in order to sign up to our online community RVC4Life, for one of our events, make a donation, request information from us or communicate with us.

We get a list from the RVC HR database of staff who self-identify themselves as a RVC Alum, so we can flag you as a current staff member and communicate with you more effectively and we add to our database staff who leave the RVC but wish to remain in touch with us.

We encourage Alumni to keep their record up to date - mainly with employment activity and contact details, so we can make sure you are invited to appropriate activities and enable us to target mailings to the right audience.

### **When it is provided to us indirectly**

**Upon Graduation:** As you graduate, we create an outline record for you from the RVC Student database (SITS) with name, course details, date of birth, Student Number, home address and your RVC email address. This is so we can start to involve you in RVC4Life our RVC alumni community and record touchpoints. When you leave RVC, we add on the rest of your personal contact details. For Alumni who graduated before circa 1984, we will try to collect similar data from paper records in the RVC registry Office if we can to enable us to get in touch with you if we do not have your details on our database already.

We on occasion, collect lists of members of RVC clubs and societies, and we append this information onto your Alumni record so we can run reunions and other events and let you know about related activities that are taking place, particularly relevant to you.

Every time you get in touch with us, we get in touch with you, or you take part in any RVC activity, we record this touchpoint on your record.

**When you give permission to other organisations to share or it is available publicly:** We combine information you provide to us with information available from external sources. This is known as data-appending and enables us to contact you in the event that you change your address, job or phone number, or didn't provide it to us. We also use this information to gain a better understanding of our supporters to improve our fundraising methods, products and services and make sure we contact you in the most relevant and appropriate way.

You may have provided permission for an organisation or company to share your data with third parties or to be placed in the public domain. Such companies and organisations might include the RCVS and other professional organisations, independent event organisers, or for example fundraising sites like Just Giving or Virgin Money Giving. These independent third parties will only do so when you have indicated your consent. You should check their Privacy Policy when you provide your information to understand fully how they will process your data. Public domain information may include information found in places such as the RCVS Directory, Companies House or published in articles/ newspapers, such as Vet Times and professional veterinary press.

The information we get from other organisations depends on your privacy settings and the responses you give them. This information comes from the following sources:

### **How we use your personal data.**

Your personal information is used as permitted or required by law and for a range of administrative, and, with your consent, marketing purposes in relation to the provision of services to you as Alumni of the RVC and our fundraising activities. Its uses include the following:

#### **Communication:**

- To provide you with the services, products or information you asked for
- To provide assistance if you enter your details onto one of our online forms, and you don't 'submit' the form, we may contact you to see if we can help with any problems you may be experiencing with the form or our websites
- We may pass your information to our service providers. We always make sure there are appropriate controls in place first; the service provider will never use your data for any additional non-RVC purpose. Some examples of service providers would be using an emailer service to send out personalised email newsletters, using a mailing house to send out Alumni magazines, or screening names and addresses via a data bureau to remove deceased people from our mailing list and keep addresses up-to-date.

#### **Fundraising:**

- To send you information about activities we believe are most relevant to you, including fundraising.
- To administer your donation or support your fundraising. Donations are administered by the RVC's registered charity the Royal Veterinary College Animal Care Trust (reg charity no 281571).
- If you make a donation to RVC, you are given the option of deciding whether your name can be used on donor lists and other stewardship materials if they are legible. If you consent to this, we may publish your current name and the fact that you are a RVC donor.

#### **Administration and Record keeping:**

- To keep a record of your relationship with us and with employers and other alumni
- To ensure we know how you prefer to be contacted – your consent data is stored to comply with DP rulings and Fundraising Regulator Codes of Practice.
- To understand how we can improve our services or information.

## Networks

- If you have joined a specific Alumni network or group, then we may share limited data with the organisers of that network, so they can manage events and communications. The organisers will have first signed an agreement to handle your data securely and only for this agreed purpose. We do not give out your data to organisers of groups that you have not opted into, but we may contact you on their behalf.

## Targeting communications

- We use very basic profiling techniques (but no automated decision making) to ensure communications are relevant and timely, and to provide an improved experience for our Alumni. Profiling also allows us to target our resources effectively, so we don't waste them, or your time. Understanding your background, ability and willingness to engage with or support particular RVC projects and initiatives helps us to make provide appropriate information and, if fundraising, appropriate requests.
- When building a profile we may analyse geographic, demographic and other information relating to you in order to better understand your interests and preferences in order to contact you with the most relevant communications. In doing this, we may use additional information from third party sources when it is available. Such information is compiled using publicly available data about you, for example addresses, listed Directorships, typical earnings or house prices in a given postcode/area and publicised donations to other causes

## Legal obligations and Graduate Destinations

- All UK universities are obliged to give contact details for a sample of recent graduates to HESA (The Higher Education Statistics Agency) in order to conduct a survey of graduate destinations.
- Graduates from Summer 2017 and earlier will be contacted both 6 months and potentially 3 years after graduation ("DLHE survey"). See <https://www.hesa.ac.uk/about/regulation/data-protection/notices/dlhe-c16018>
- Graduates from November 2017 onward will be contacted 15 months after graduation. (The "Graduate Outcomes" survey, which replaces the DLHE survey from 2017/18). See [https://www.hesa.ac.uk/files/HESA\\_Student\\_Collection\\_Notice\\_2017-18.pdf](https://www.hesa.ac.uk/files/HESA_Student_Collection_Notice_2017-18.pdf)
- These surveys help to inform government policy. They are also used in calculations for university league tables and by the universities themselves to assess the longer-term impact of the student experience. The data is provided to HESA strictly and solely for this purpose. All recent graduates to whom this applies will be given the option to opt out of the survey when they are first contacted.

## How long will we keep your personal data?

When we are processing on the basis of *legitimate interests* we will do so for as long as those *interests* remain *legitimate* this will be kept under review and we will cease to process such data when this legal basis ceases to function.

Where we are processing your data under the legal basis of consent (e.g. marketing, research) then we will keep it for as long as we continue to have your consent. We will update our records by seeking consent on a regular basis or through you telling us you no longer wish us to process your data (you may use unsubscribe options or email [development@rvc.ac.uk](mailto:development@rvc.ac.uk)).

## **How can I access my personal information and exercise my other rights in relation to personal data that the RVC holds about me.**

Under UK Data Protection Law you have the right, subject to certain exemptions. You have a right to ask for a copy of the information we hold about you and to have any inaccuracies in your information corrected. If you want to access your information, send a description of the information you want to see and proof of your identity to [development@rvc.ac.uk](mailto:development@rvc.ac.uk).

If you are an RVC Alumnus/Alumna and have created an account for our Alumni Online Community (RVC4Life), you can sign into your account to access and update most of your information.

You also have a range of further rights as follows: Right to be informed; Right of Rectification; Right or Erasure, Right to be Forgotten; Right to Restrict Processing; Right to Data Portability; Right to Object; Rights in relation to Automated Decision Making and Profiling. Details of your rights are set out in more detail in the RVC's Data Protection policy which can be found on our [website](#).

## **Who regulates the use of my personal information?**

The College maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with Data Protection Law. The RVC's registration number is Z6779018. Please see the [Information Commissioners Office](#) website for details.

## **Who do I contact with questions?**

If you have any questions or concerns about how your personal data is used, or you wish to exercise one of the rights outlines above please contact the College's Data Protection Officer: [data@rvc.ac.uk](mailto:data@rvc.ac.uk)

Further information, including our Data Protection Policy, can also be found on our website

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