

Coventry University

Citizen Social Science Alumni Privacy Notice

Who are we?

In this Privacy Notice, the terms "**we**", "**our**", and "**us**" refer to Coventry University Higher Education Corporation, Priory Street, Coventry, United Kingdom, CV1 5FB (ICO registration number Z6939585).

As a controller of your personal data we are responsible for looking after it, and we will use it fairly, lawfully, and in a transparent manner.

Purpose

We are committed to protecting your privacy. This notice will help you understand how we look after, use, store and share your personal data, and how we meet our obligations under the General Data Protection Regulation 2016 and the Data Protection Act 2018 (Data Protection Laws). It supplements any other notices or statements we may provide to you.

What personal data do we collect?

"Personal data" is any information from which you can be identified, e.g. name, date of birth, contact details, identification numbers, photographs, and expressions of opinion about you.

The type of personal data we collect about you and how we collect it can vary depending on your interactions with us.

Where applicable, we will collect:

- identity data - includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, university ID number;
- contact data - includes address (home, postal or other physical address), email address and telephone numbers;
- equality of opportunity or treatment data (including racial origin, religious beliefs, health, and sexual orientation);
- academic information including academic department and programme of study, years of study and graduation dates, classification of degree;
- images (including photographs and videos);
- career data;
- event data;
- case study data (i.e. data relation to Citizen Social Science Alumni experience); and
- research and profiling data (including financial, business, philanthropic and demographic information).

Special Category Data

We may process your 'special category data' such as:

- racial or ethnic origin;
- religion;
- political views;
- trade union membership;
- genetics and biometrics (where used for ID purposes);
- health and disabilities; and
- sex life and sexual orientation.

We will only process this data where you have given your explicit consent for us to do so; where you have manifestly made the personal data public; or when that processing is legally required.

Where do we get your personal data from?

We collect your personal data directly from you; during your visits to our website; if you attend our events; or through any other communication you have with us.

Except for your IP address data, when visiting our website we will only collect personal data when it is voluntarily submitted.

We also obtain some personal data from other third parties (please see below for further details).

<p>Information that you give us</p>	<p>You may share personal data about yourself and your circumstances by:</p> <ul style="list-style-type: none"> • enquiring about our activities; • registering for an event or volunteering; • making a donation; • engaging with our social media channels; • confirming your contact details when we contact you to find out information about our graduate outcomes; and • otherwise by giving us information about yourself in any communications with us either by telephone, e-mail, or post. <p>We need you to provide personal data in the situations listed above so we can support you or give you information that you need, and so we can comply with our legal obligations.</p> <p>If you do not provide this data, it may mean that we will be unable to perform the services that we usually provide and therefore, we may have to cancel a service you have requested, but we will notify you if this is the case at the time.</p>
<p>Information that we collect about you</p>	<ul style="list-style-type: none"> • details of your visits to our website including, but not limited to, Internet Protocol (IP) address used to connect your computer to the internet; MAC addresses; traffic data, location data; your login information; time-zone setting browser type and version; browser plug-in types and versions; operating system and platform; weblogs; cookies and other communication data; and the resources that you access. For more information please see our Cookies Notice.

	<ul style="list-style-type: none"> • data including your name and images captured on body-worn cameras or CCTV when you visit one of our campuses; • as part of the events organised at our campuses and their associated buildings, as necessary for our legitimate interests, third party photographers may be on site. If you do not wish to be included in any photographs or live streamed events (such as graduation ceremonies which are recorded and available online), please ensure that you clearly express your wishes to a member of our staff or directly to the third parties.
<p>Information that we receive from other sources</p>	<p>We may receive personal data about you from other third parties, for example:</p> <ul style="list-style-type: none"> • address and detail verification check providers (where it is considered acceptable by the Information Commissioner's Office to obtain information from such providers). • other Coventry University Group staff or students (including as part of our Case Reporting System); • we may also use third parties to collect personal data on our behalf to support our activities.

Please note that we may combine all personal data that we collect about you, i.e. data we receive from other sources, data you give to us and data we collect.

Why do we need your personal data and how do we use it?

- To provide you with information you have requested about our work and/or activities. This might include sending you e-newsletters, invitations to events and volunteering opportunities. We will use your name and the contact details that you provide to us.
- To monitor graduate outcomes and keep our Citizen Social Science Alumni records up to date in accordance with our public interest functions.
- To offer you Citizen Social Science Alumni and careers support, and promote further postgraduate study in accordance with our public interest functions and our legitimate interests.
- For administration purposes e.g. we may contact you about a donation you have made or event you have expressed an interest in or registered for.
- To ask you for permission to use the story of your experience with Coventry University Group to promote our work.
- To create an account for you if you register with us.
- To process entries into a prize draw or raffle that you have chosen to enter, and to communicate with winners.
- For internal record keeping, including the management of any feedback or complaints that we may receive.

- To use IP addresses to identify your approximate location, to block disruptive use, to record website traffic or to personalise the way our information is presented to you, in order to keep our website updated and relevant to you and for network security.
- To analyse and improve the services offered on our sites and to make them as user-friendly as possible, in order to keep our websites updated and relevant to you, to develop our work and inform our marketing strategy.
- To use anonymised personal data to benchmark our activity with other relevant organisations, including CASE.
- To transfer to HM Revenue and Customs in respect of any Gift Aid claims for statutory and regulatory compliance.
- To assess your personal data for the purposes of credit risk reduction or fraud prevention.
- To keep your records as up to date as possible. To help us do this we may use publicly available sources for example, the Post Office's National Change of Address database. Please see the 'Keeping your information up-to-date' section below for more details on how you can let us know if your contact details change.
- To market and promote Coventry University, its courses and events to Citizen Social Science Alumni.
- To engage with Citizen Social Science Alumni to encourage business partnerships and recruitment activities with Coventry University.
- To provide you with the services and information of CU Citizen Social Science Alumni. We will use information provided by you to help you advance your career through inside connections, leverage your professional network, get introduced to people, socially interact with other users and share photos with them, create and/or share and/or find business opportunities and stay in touch with the Membership Organization. You consent to the use of your profile and personal data being used for this purpose when signing up on the website. For details on CU Citizen Social Science Alumni Website Privacy Notice, see [here](#).
- To facilitate the process of legacy gifts and claiming gift aid on donations.
- To ensure equality of opportunity to all students in terms of access and participation.
- To safeguard students and staff by providing safe and secure environments and meeting health, wellbeing and duty of care requirements, in line with Health and Safety legislation, throughout the duration of their studies and/or employment.
- To facilitate the protection and wellbeing of individuals and enforcement of the general regulations concerning criminal activities and participation.
- When you visit a member of staff or, in some instances, when you attend an event on campus, we will process your data such as name and vehicle registration number in order to provide you with a parking permit. Where applicable we may also process disability information, in order to make reasonable adjustments for accessible parking.
- We will keep records of attendance (and that of your guests) on visits across our campus, including visitor logs, details of any payments made, photographs and video recordings in which you may be included (CCTV), in order to operate security.

- If you report a data breach we will set up an electronic case file containing the details of the breach and we will keep a record of our correspondence with you. We need information from you to contain and mitigate the risk. This enables us to comply with our legal obligations under the legislation we are subject to.
- If you submit a Freedom of Information Request or a Data Subject Access Request we will keep a record of that correspondence so as to deal with and/or respond to your request. We need information from you to respond to you and to locate the information you are looking for. This enables us to comply with our legal obligations under the legislation we are subject to. When we receive a request from you, we'll set up an electronic case file containing the details of your request. This normally includes your contact details and any other information you have given us. We'll also store, on this case file, a copy of the information that falls within the scope of your request in order to maintain adequate records of information we have made public and/or released to you.

In addition to the above, we may use your personal data for wealth screening, research and profiling. Our purpose is to gain a better understanding of how we should engage with you, and tailor our communications more effectively and appropriately. This also helps us make informed decisions about our fundraising strategy and ensure our internal resources and investments are used as effectively as possible. Our objective is to ensure any approaches we make to you are respectful, professional and are based on evidence that you might be interested in our work, providing you with the best experience we can. Please read below for more information:

Research – this could include research on financial, business, philanthropic and demographic information sourced from publicly available data, such as Companies House, the Charity Commission and the media. We may also look at professional networks such as LinkedIn, and process special category data if it has been made manifestly public by you, for example, through an interview or a publicly directed social media post. In addition, we may combine the data you provide with data we obtain from other sources (e.g. to verify we have correct addresses/postcodes).

Profiling – this could include analysis of financial, philanthropic and other personal data we hold on you to assess the likelihood that you might wish to engage with us, as well as broader data analysis. This analysis helps us to gain a better understanding of how to approach you, of your interests, and of broader demographic, geographic and engagement trends amongst our supporters. This process does not solely rely on automated processing and always contains manual assessment to ensure we are making correct assumptions from the analysis.

In order to comply with our legal obligations under the Charity Commission Regulations and the Fundraising Regulator's Code of Practice, we may also undertake due diligence research to assess the source of funds for donations and to ensure that we are robustly considering ethical and reputational risks to our organisations.

If you do not wish your personal data to be used in any of the ways listed above or have questions about this, you have the choice to change your privacy options and can notify us using the contact details at the top of this page. Please also see the '**Your rights**' section below which provides further information about your legal rights. If you are unsure and have further queries on how we might use your data, please get in touch and we'll be happy to answer your questions.

Legal Claims

Personal data, including special category data, may be processed for the purpose of establishing, exercising or defending a legal claim.

Basis for using your personal data

We need a legal basis for any processing of personal data. This means that our processing must be for one of a limited number of reasons set out in the data protection laws. The legal bases that we rely on are:

We mainly process your personal data as described in this Notice because it is necessary in our legitimate interests to deliver our Citizen Social Science Alumni services and future fundraising ambitions. Some processing of your personal data may be carried out to perform a contract with you or because it is required by law, such as the completion of the Graduate Outcomes Survey or obligations for processing Gift Aid on your donations.

We routinely carry out data protection impact assessments to ensure the way in which we use your personal data is fair and does not negatively impact you.

Further details of the legal bases that we rely on are:

The processing is necessary for the entry into or performance of a contract

When we process Citizen Social Science Alumni donations, payments for Citizen Social Science Alumni events or claim gift aid donations, we are performing a contract with you. For us to deal with any enquiry or request made by you prior to entering into a contract, and to fulfil our obligations under it, we will need to collect, process and share (as further detailed below) your personal data. Please note that we may not be able to provide the services under it if you: do not provide us with the personal data required; object to the type of processing we need to do; or exercise your right to have your personal data deleted.

Compliance with a legal obligation

Sometimes we process your personal data because we are legally obliged to do so, for example: in some of the circumstances listed above; in relation to the prevention of crime; or because we may be required to share your personal data with certain statutory bodies.

The processing is necessary for the performance of a task carried out in the public interest

We may need to process your personal data in order to carry out our public interest task as a university, such as monitoring graduate outcomes and keeping our records updated accordingly.

Legitimate interests

We may use your personal data (excluding special categories of personal data) as set out in this Privacy Notice for our legitimate interests including:

- raising the profile of Coventry University by giving the best possible opportunities to its graduates;
- maintaining relevant and up to date records;
- offering careers support and promoting further postgraduate study;
- protecting our reputation and goodwill;
- ensuring equality of access and participation and outcomes;
- utilising photographs and videos for marketing and promotional purposes; and
- claiming Gift Aid on donations.

We will always balance our legitimate interests in processing your personal data against your privacy rights.

Legitimate interest	We have a legitimate interest in processing your personal data as:
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	<ul style="list-style-type: none"> • you benefit from the provision of the services we provide; • we both benefit from the ability to enforce or apply rights under any contract between us; • this enables us to provide assistance to you following your graduation; • a strong relationship with our graduates is mutually beneficial.
Necessity	the processing is necessary for the purposes outlined in this Privacy Notice.
Impact of processing	such processing does not unreasonably intrude on your privacy.

Vital interest

We consider it reasonable to process personal data for the protection of any interests that are essential for someone’s life.

Consent

Generally, we do not rely on consent as a legal basis for processing your personal data other than for sending third party direct digital marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

Where we wish to use your image in promotional videos and photographs, we will first obtain your consent.

If we require your consent to process your personal data in any other circumstances, we will contact you separately to request this.

Processing of your personal data

"**Processing**" means doing anything with the personal data, such as collecting, recording, organising, structuring, storing, adapting or altering, retrieving, accessing, consulting, disclosing, disseminating, aligning or combining, restricting, erasing or destroying or using the data in any way.

We will process your personal data for the purposes set out above, or as we otherwise notify you.

The personal data you provide will be subject to security measures and procedures to minimise the risk of unauthorised access, loss, theft or disclosure.

Your personal data will not be used for the purposes of automated decision making.

How long do we keep your personal data for?

We will only keep your personal data for as long as we need to in order to fulfil the purposes for collecting it, including satisfying any legal, accounting, or reporting requirements.

We consider a number of factors in deciding how long to keep your data: the amount, its nature and sensitivity, the potential risk of harm from unauthorised use or disclosure; the purposes for

processing it, and whether we can achieve those purposes through other means; and the applicable legal requirements.

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 the pledge.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this data indefinitely without further notice to you.

Who do we share your personal data with?

Your personal data is stored on our database which is password protected and access is limited to Coventry University Group staff dealing with mailing lists. Your personal data will not be disclosed to any other individuals or entities except in the following circumstances:

- On occasion, we need to use trusted subcontracted parties such as IT support services in connection with our database.
- We may pass your personal data to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to send out mailings). When we use third party service providers, we only disclose personal data necessary to deliver that service and subject to a contract to ensure your personal data is kept secure. We will not share or sell your data to third parties to use for their own purposes unless we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime. Third parties process data that we share with them, where such processing is to be conducted under a formal agreement which includes provisions around the processing of personal data and which provides appropriate safeguards.
- We may pass your personal data to photographers to support the services we provide to you and, if required, in connection with such services to the general public.
- Where it is necessary for the performance of our contract with you, including where you have asked us to do so or where we need to take steps to enforce any contract that may be entered into between us.
- Where we are under a legal duty to do so in order to comply with any legal obligation.
- In order to protect the rights, property or safety of our business, our staff, customers, suppliers and others. This includes exchanging information with other companies and organisations for the purposes of fraud prevention and credit risk reduction.
- We may also pass your personal data on to third party employers or other legitimate reference seekers.
- If you are taking part in an event, we may share personal data with external organisations providing services for the event you are attending, in particular we may share your information (including dietary requirements) with catering service if you are attending an event where catering is offered. The personal data shared will only be used to provide the service required and will not be retained by these external organisations after the event is concluded.

Keeping your personal data secure

We are committed to the protection and security of your personal data. We will ensure that appropriate measures are taken against its unlawful or unauthorised processing, and against its accidental loss or damage. We are certified to Cyber Essentials.

Other countries your personal data will be sent to and why

Your personal data may be transferred across international borders. It may be transferred to countries that have different levels of data protection to the United Kingdom.

We may need to transfer your personal data outside of UK and/or to other countries outside of the [European Economic Area \(EEA\)](#), to other members of the Coventry University Group, partner organisations, or our suppliers and service providers. Whenever we do this, we ensure an equivalent level of data protection by using appropriate safeguards, i.e. it is only processed in accordance with UK data protection laws;

- we transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- we transfer your personal data to service providers who have agreed to contractual terms approved by the European Commission, which give personal data equivalent protection as in the UK and European Union; or
- we transfer your personal data to providers based in the US if they are subject to the EU-US Privacy Shield. This requires them to provide a level of data protection which is equivalent to laws of the European Union and UK.

Please contact us if you want further information on the specific mechanism we use when transferring your personal data out of UK and other countries outside of the EEA.

We keep our mechanisms for transferring personal data outside of the UK and/or the EEA under regular review to ensure that these are in line with UK data protection laws.

How we may contact you

Please note that we may contact you in connection with the purposes set out above, by post or by electronic means (including telephone, text messages, email, social media messaging, or any other suitable electronic method).

Your choices

You have a choice about whether or not you wish to receive information from us. If you have told us that you want to receive direct marketing communications from us about the vital work we do or our events and activities, and then change your mind, then please let us know at any time by contacting our team info.ctpsr@coventry.ac.uk

Where you decide to opt out, due to some communications already being in progress at the point you do so, please be aware that it can take up to 4 weeks for your preferences to be fully implemented.

Personal Data deletion

If you choose to opt out of receiving our communications, your personal data will be retained and marked to prevent you from receiving any communications. If you want your personal data to be deleted from the database entirely, in accordance with your rights (as set out in the '**Your Data Protection Rights**' section below) we will remove it – but in doing so, we will keep an anonymised record separately to ensure we retain auditable evidence that we have adhered to your request. Under the circumstances where there is a legal obligation to retain your data, we will not erase it unless such circumstances arise for the legitimate interest of the Citizen Social Science Alumni and are above the legitimate interests of Coventry University.

Keeping your personal data up-to-date

The accuracy of your personal data is important to us. You can update your information with us, including your address and contact details at any time. If you would like to change your preferences or update the details we hold about you, please do so **INSERT LINK TO FORM**, or contact our Team on info.ctpsr@coventry.ac.uk

Your Data Protection Rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data that we hold about you, and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data that we hold about you corrected, although we may need to verify the accuracy of the new personal data.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data if:

- there is no good reason for us continue processing it;
- you have successfully exercised your right to object to processing (see below);
- you believe we may have processed your personal data unlawfully; or
- we are required to erase your personal data to comply with the law.

Please note that we may not be able to comply with your request for specific legal reasons which, if applicable, will be notified to you.

Object to processing of your personal data when we are relying on public task or a legitimate interest (or those of a third party), and you feel that this processing impacts on your fundamental rights and freedoms. However, these may be overridden by the public interest or our legitimate interest grounds.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the accuracy of the data;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it (for example if you need it to establish, exercise or defend legal claims); or
- If you have objected to our use of your data, but we need to verify whether we have overriding public interest or legitimate interest grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated data that you initially provided consent for us to use, or where we used the data to perform a contract with you.

Withdraw consent at any time when we are relying on consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. You can ask us to stop sending you marketing messages at any time by following the "unsubscribe" (or similar) links on any marketing message sent to you, or by contacting us at any time.

When you opt out of receiving these marketing messages you will no longer hear from us in that regard.

Exercising your rights

If you wish to exercise any of your above rights, please send a written request to the Information Governance Unit, Coventry University, Portal House, 163 New Union Street, Coventry, CV1 2PL, or email dsar@coventry.ac.uk.

You will not have to pay a fee to exercise any of your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information, in order to speed up our response.

We try to respond to all legitimate requests within one month, although it may take us longer if your request is particularly complex, or if you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints and questions

If you would like to make a complaint, compliment or comment then please get in touch with our Team:

info.ctpsr@coventry.ac.uk

The Citizen Social Science Alumni team are available to help Monday to Friday, 9am – 5pm.

We have appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any concerns or complaints about it, please contact the Data Protection Officer at Coventry University, Priory Street, Coventry CV1 5FB or email dpo@coventry.ac.uk.

If you are not satisfied with the proposed resolution of your complaint, you have the right to contact the Information Commissioner's Office. Further information can be found on the Information Commissioner's website at www.ico.org.uk or via their helpline on 0303 123 1113.

We reserve the right to update this Privacy Notice at any time. Any updated versions will be made available on our website

Feedback

If you have feedback for us about this privacy notice, please let us know by emailing enquiry.igu@coventry.ac.uk.