



Graduate Privacy Notice

Introduction

1. Students who are leaving the College continue to be very important to us. This Privacy Notice explains how Spurgeon's College collects, stores, manages and protects the data of students who are leaving. It outlines the types of data that we hold and how we use them to provide services to you. It also outlines what steps you can take if you would like us to change how we use your data or if you would like us to stop using it altogether.
2. The College is the 'Data Controller' of your personal data and is subject to the General Data Protection Regulation 2016 (GDPR). We are registered with the Information Commissioner's Office (ICO).
3. Our responsibilities and the legal basis for processing your data
4. The College collects information about you over the course of your time with us. On completion of your course this information is used by us to continue our relationship with you, as alumni.
5. Spurgeon's College is committed to protecting your personal data. We aim to be clear how we use your personal information, and not do anything you would not reasonably expect. We are the data controller for all the personal data we hold and process, except where we use data in the capacity of a data processor on behalf of another data controller.
6. All information you provide to us will be used in accordance with the College's Data Protection Policy, (a copy of this policy is available from the Director of Operations). Your personal data will be stored securely in our database which is part of Spurgeon's IT infrastructure and held in accordance with the Data Protection Act 1998.
7. We will only use your personal information when the law allows us to do so by providing us with a legal basis or valid condition.
8. Most commonly, we will use your personal information under the following conditions:
 - For compliance with a legal obligation (e.g. sending graduate information to the Higher Education Statistics Agency or for equal opportunities monitoring)
 - To fulfil contractual obligations we may have with you (e.g. when you make a purchase from us)

- For the performance of our public task (e.g. where you contact us for a copy of your transcript)
 - Because we have a legitimate reason to do so (e.g. to enable us to administrate a donation or gift from you)
 - If we have your consent to contact you to:
 - provide you with news and events
 - providing relevant benefits and services
 - further the College's educational charitable mission (which includes fundraising and securing the support of volunteers)
9. We may also use your personal information if we need to protect your vital interests (or someone else's interests), for example if you are taken ill whilst visiting the College.

How do we collect personal information?

10. The vast majority of the information we hold is obtained directly from you. All student names, academic qualifications and contact details are held on the College's student records database and used to create a record for you as a graduate.
11. We obtain personal information from you when you graduate, enquire about our activities, register for an event, make a donation to the College or otherwise provide us with personal information.

What personal information do we collect?

12. Spurgeon's College collects information about you when you complete your enrolment form, and throughout your time at the College.
13. Spurgeon's College maintains a record of all former students and, as such, we hold education records in perpetuity. Information about graduates, including their final award, is published each year in a graduation programme and is therefore considered to be in the public domain.
14. The personal information we will collect and process will include name, date of birth, and contact details including email address and mobile number. The information we collect might also include career and employment history, areas of interest and potential interest, and details about propensity to volunteer and/or to support the College financially through charitable donations. If you make a donation to the College, or pledge a donation to the College, we will also record your donation and/or pledge details on your record, including Gift Aid status, where applicable (as required by HMRC).
15. The College does not store any credit/debit card details and is fully PCI-DSS compliant.
16. We will keep a record of contact with you and your attendance at College events or activities. We will also keep a note of any changes you tell us about, including when you change your address, or name. You can keep your

personal and employment details up to date by contacting enquiries@spurgeons.ac.uk.

17. We also collect information by tracking which pages you visit when you click on links to our website in our emails, and may use this information to personalise the way our websites and emails are presented to you (see our Website Privacy Policy).

How do we use your personal information?

18. We will only process your data for the specific purposes that we tell you and then only to the extent necessary for that specific purpose.
19. Your personal information will be used to provide any services you have requested and to keep in touch with you as a graduate of Spurgeon's College. We may communicate with you about the following:
 - College updates and news
 - Publications
 - Invitations to events
 - Ways to get involved
 - Fundraising
 - Services you have requested or that may be of interest
 - Administrative purposes
20. We will ask for your consent to contact you for specific purposes and will only contact you through the communication channels (telephone, email, post or social media) you have consented to. Unless you have requested otherwise, your data is used and processed for the full range of supporter activities and programmes and all relevant communications, fundraising and marketing activity.
21. Note that we may have to contact you for a reason where your consent is not required, for example in order for us to comply with the law, or to fulfil a contractual obligation. Examples include:
 - Sending graduate information to the Higher Education Statistics Agency
 - To fulfil contractual obligations we may have with you when you make a purchase from us.
 - To administer an enquiry from you, for example where you contact us for a copy of your transcript.
22. We may need to contact you up until the fifth anniversary of your graduation, when the 'currency' of your qualification expires. Up until this point your qualification credits may be transferable into qualification advancement.
23. Contact details provided directly by you will update any previous in relation to this channel unless you inform us otherwise. If you are registered with the Telephone Preference Service (TPS) and provide us with a telephone number which you have consented for us to use, we call you on this number. We will not use any channel of communication which you have not consented to.

24. Your data will not be disclosed to external organisations other than those acting as agents for the College. We always make sure there are appropriate controls in place so that your data will remain secure. We will never sell, trade or give away your data.
25. We may use third-party partners to support the activities described above. If you interact with the College through a third party (for example, supporting Spurgeon's via JustGiving) then we may obtain information about you from that third party. The receipt of data in this manner is subject to the third party's own privacy policy. A list of parties with whom we partner in this way is available on request. Data obtained in this way are treated no differently to any other once held by the College, and are bound by the terms of this Privacy Notice as soon as they are received.
26. Tools may be used to help us improve the effectiveness of the College's communications with you, including tracking whether the emails we send are opened and which links are clicked within a message. We monitor (using cookies) website visits and use tools such as Google Analytics to improve our website and services. Further information on cookies, and how to disable them if desired can be found in our Website Privacy Policy.
27. We may analyse the personal information we collect to create a profile of your interests and preferences so that we can contact you in the most appropriate way and with the most relevant information. We may also use your data to help plan our supporter engagement activity and fundraising. This may include wealth screening whereby publically available information (for example press cuttings, the Charity Commission Register), together with information from third party suppliers, could be used to assess capacity to provide philanthropic support to the College. Wealth screening enables us to understand the background of our alumni and other stakeholders, and to make appropriate requests to those who may have the means and the inclination to give more.
28. We do not use your personal information to carry out automated decision-making processes.

Who do we share your personal information with?

29. Unless we have a legal obligation to do so, we will not disclose your data to individuals, organisations or other entities outside the College other than those which are acting as agents for the College (for example, if we use a company to print and send out documents). We do not sell to or trade your data with any other organisations.
30. The College has a legal obligation to supply some of the information we hold about you, as a graduate, to the Higher Education Statistics Agency (HESA) – the official agency for the collection, analysis and dissemination of quantitative information about higher education in the United Kingdom. HESA will treat your data in line with its collection notices. HESA produces official statistics (such as university league tables) and its outputs are regulated by the UK Statistics Authority, which has a direct line of accountability to Parliament. For more information about how HESA use your data go to

31. We may need to disclose your information to a third party if required by law (for example to government bodies and law enforcement agencies) or if we have your permission to do so.

International data transfer

32. Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the European Economic Area (EEA). This may occur if, for example, one of our trusted partners' servers are located in a country outside the EEA. Where these countries do not have similar data protection laws to the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law.

How do we protect your personal information?

33. We are committed to holding your data securely and treating them with sensitivity. All data are held securely and in accordance with the Data Protection Act 1998. Your data are held on a database hosted on a secure server within the College's IT network.
34. We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.
35. Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions contained within a contract, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.
36. We have put in place procedures to deal with any suspected data breach. If you suspect a data breach has occurred at the College, the organisation has a duty to report this to the Information Commissioners Office (ICO) within 72 hours. Please report suspected data breaches to the Data Protection Officer as soon as you can.

How long do we keep your personal information?

37. Spurgeon's College considers its relationship with graduates and supporters to be lifelong, and we will hold your details until you tell us you no longer wish to hear from us. Generally, we will process your personal data only as long as is necessary for the purpose(s) for which it was collected (unless otherwise advised) and in accordance with the College's Records Retention Schedule (a copy of this schedule can be provided on request). Sometimes we are obliged by law to keep your data for a certain length of time e.g. HMRC requires that we keep a record of your name, address and Gift Aid declaration for six years from the date of your last donation. Data will be kept securely and destroyed

appropriately when no longer required. The College may also decide to archive some data.

Your rights and how to contact us

38. We will always try to ensure that the data we hold for you are up to date, reasonable and not excessive. In certain circumstances, by law you have the right to:
- Be informed as to how we use your data (via this Privacy Notice)
 - Access or request a copy of the data we hold about you
 - Update, amend or rectify the data we hold about you
 - Change your communication preferences at any time to restrict how we process your data, or opt out of some or all communication from us
 - Ask us to remove your data from our records
 - Withdraw consent, where it is used as a legal basis for processing
 - Object to or restrict the processing of your information for any of the purposes outlined above.
39. If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer.
40. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
41. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.
42. If you have any questions about this Privacy Notice, your data rights, or would like to receive a copy of the information we hold about you, please contact:

Rev Helen Stokley

Data Protection Officer

Spurgeon's College

South Norwood Hill

London

SE25 6DJ

dpo@spurgeons.ac.uk

+44 (0)20 86530850

43. If you feel that we have let you down in relation to your information rights then please contact us so that we can discuss this with you and rectify the situation.

44. You can also make complaints directly to the Information Commissioner's Office (ICO). The ICO is the independent authority upholding information rights for the UK. Their website is ico.org.uk and their telephone helpline number is 0303 123 1113.
45. From time to time, we may use your information for new purposes not currently described in this Privacy Notice. If our information practices change at some time in the future, we will always post the policy changes on this page.

Document control box			
Title	Graduate Privacy Notice		
Date approved	29 September 2018	Implementation date	September 2018
Updated	July 2019		
Version	3	Supersedes version	2
Approving body	Governors		
Quality Code consulted			
Member of staff responsible	Director of Operations		