

Privacy Notice for Fundraisers, Supporters & Alumni

We, the University College of Osteopathy (UCO), of 275 Borough High Street, London SE1 1JE, telephone number: +44 (0)20 7407 0222, are the Data Controller for personal data relating to you that we process. The UCO is registered with the Information Commissioner's Office (Registration Number: Z7454534) and www.uco.ac.uk is a website operated by the UCO.

This Privacy Notice informs you about how and why the UCO collects, processes, uses and shares your personal data, your rights regarding the personal data we hold about you and relates to prospective, current and past Fundraisers, Supporters & Alumni of the UCO.

We promise to respect any personal data you share with us, or that we get from other organisations and keep it safe. We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect.

Developing a better understanding of our Fundraisers, Supporters & Alumni through their personal data enables us to make better decisions about maintaining a good relationship with them and fundraise more efficiently.

Effective Date

This Privacy Notice is effective from: **9th Sept 2020**.

The current version of this Privacy Notice can be found at <https://www.uco.ac.uk/policies-and-procedures>.

What information we collect

As Fundraisers, Supporters & Alumni of the UCO, we may hold a range of personal information about you. Examples of categories of personal data which we may hold are:

- Your full name and title, contact details (address, email and contact number).
- Your date of birth (if applicable).
- Year of graduation (if applicable).
- Professional details (if applicable).
- The course(s) you completed and / or your dates of study at the UCO.
- Your bank or credit card details, when you make a donation.
- Your Gift Aid status (we do not collect information about your actual tax payments, only whether you are a taxpayer or not).
- The reason why you have decided to fundraise for or donate to us and your history of donations made to the UCO.
- Your occupational details and your experiences as a patient or service-user within the UCO clinic, with osteopathy or with any of our other healthcare services.

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- Any other information provided by yourself at our request.
- We do not usually collect “sensitive personal information” about you unless there is a clear reason for doing so, such as participation in an event where we need this information to ensure we provide appropriate facilities for you. We may collect health information if you tell us about your experiences of the UCO (for example, if you act as a case study for us), however, we will make it clear to you when collecting this information as to what we are collecting and why.

How we collect your information

We may collect a range of personal data about you from a number of sources. The majority of the personal data that we hold is information provided to us by you.

If you studied at the UCO, certain personal data collected during your time as a student is transferred from your student record to the alumni database when you leave, e.g. biographical, contact and education details.

If you are a supporter of the UCO, the personal data we hold is usually information provided by you as part of membership or donation forms, e-newsletter sign-ups, feedback surveys or any other correspondence we receive from you.

We may also collect and hold personal information derived from publically available sources (either directly or through internet search functions).

The purposes for which we process your personal data and the legal basis

We only process data for specified purposes and if it is justified in accordance with data-protection law.

The legal justification for the purposes for which we shall process your data is as follows:

- a) Legitimate Interests** (the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests).

Under this lawful basis we may use your personal information for the following purposes:

- To understand our Fundraisers, Supporters & Alumni and develop and maintain a strong network with them.
- To provide you with the services, products or information you have requested.
- To administer and process any donations (including processing gift aid) that we may receive from you.
- To profile your interests and preferences.

- b) Consent** (you have given clear consent for us to process your personal data for a specific purpose).

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Under this lawful basis we may use your personal information for the following purpose:

- Depending on our previous relationship with you, to send you marketing newsletters or updates about our activities and events, to send you information about our fundraising operations, including occasional targeted requests to consider giving financial support to the UCO, or to ask you to consider supporting us in other ways by your preferred method of communication.

We will not use your personal information for such marketing purposes if you have informed us that you do not wish to be contacted.

When you subscribe to our services or give consent to receiving news and information from us, you can cancel your subscription, withdraw your consent to being contacted or change your preferred method of contact at any time by contacting fundraising@uco.ac.uk.

Subscribing for email newsletters and other marketing communications is optional.

You do not need to subscribe to marketing from us when you donate or use any other of our services.

We have adopted an 'opt-in only' communication policy. This means that we will only send marketing communications, which include information about our latest activities and events, to those that have explicitly stated that they are happy for us to do so via their preferred channel(s) (email, SMS, phone or post).

If you would like to receive such communications but have not opted in please contact us on 020 7089 5317 or fundraising@uco.ac.uk.

Where we process your sensitive personal information, we will only do so with your explicit consent.

Payment Card Information

The UCO like many charitable and academic institutions is moving towards electronic payments. The University College of Osteopathy does not store any sensitive payment card data in our systems. The UCO will have an active PCI-DSS compliant system in place. This is the international standard for safe card payments.

Who it will be shared with

On occasion we may need to share your data internally and with third parties.

We may share your personal data internally with our staff who deal with Fundraiser, Supporter & Alumni activities, including those staff associated with those activities (such as IT).

We will not share personal data with external third party organisations for marketing purposes, but may occasionally outsource functions when we do not have the in-house capacity required, such as the use of a mailing house for mailings, and analytical services that enable us to target our communications with Fundraisers, Supporters & Alumni more effectively.

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In such cases your personal data will only be transferred on one of the following bases:

- Where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission);
- A European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- There exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

We may pass your information 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 process donations and send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

Please be reassured that we will not release your information to third parties beyond the UCO for them to use for their own direct marketing purposes, unless you have requested us to do so, or 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.

How long we shall keep it for

Subject to any other notices that we may provide to you, we shall retain all records of Gift Aid transactions for at least 6 years for auditing purposes.

Other data that we collect about you shall be retained by us indefinitely or until such time that you inform us that you no longer wish to be a fundraiser or supporter of the UCO.

When your information is no longer required, we will always dispose of it securely in accordance with our Records & Information Management Policy: <https://www.uco.ac.uk/policies-and-procedures>

Please also view our Information Security Policy here: <https://www.uco.ac.uk/policies-and-procedures>

Your rights

Under the GDPR¹ you have the following rights:

- To obtain access to, and copies of, the personal data that we hold about you.
- To require us not to send you marketing communications. If you ask us to delete your personal data, we will continue to maintain a core set of personal data comprising very brief information to ensure that we do not inadvertently contact you in future.

¹ <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

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- To require us to correct the personal data we hold about you if it is incorrect or where appropriate, given the purposes for which your personal data is processed, the right to have incomplete data completed.
- To require us to erase your personal data. This is a limited right which applies, among other circumstances, when the data is no longer required, or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest.
- To require us to restrict our data processing activities. This is a limited right which will apply in specific circumstances and for a limited period.
- Where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller.
- To object to the processing of your personal data when such processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exemptions or exceptions apply (please see our Freedom of Information Policy for further details: <https://www.uco.ac.uk/about-uco/who-we-are/freedom-information>).

If you have given your consent and you wish to withdraw it, please contact fundraising@uco.ac.uk.

Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

If you wish to access the personal data we hold about you, please submit a Subject Access Request to us. Please refer to our Subject Access Request Procedure which helps you to do this: <https://www.uco.ac.uk/policies-and-procedures>

Changing your information

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details. You can do this by emailing fundraising@uco.ac.uk with the relevant information.

We understand that your personal information and privacy are important to you. We make every effort to ensure that the information you share with us is recorded accurately, retained securely and used only according to your wishes. We protect your personal information and adhere to all current data protection legislation with respect to protecting privacy. We do not give out, sell or trade our mailing list data with third parties. The information you provide will

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be used primarily to protect your status as a fundraiser or supporter and to keep you informed about the activities of the UCO. If at any time you no longer wish to receive communications from us, simply contact us by using the online contacts form or by email at fundraising@uco.ac.uk.

Contact the Data Protection & Freedom of Information Officer (DPFIO)

If you have any queries about this privacy notice or how we process your personal data, you can contact our Data Protection & Freedom of Information Officer by: Email: dpfio@uco.ac.uk / Telephone: +44 (0) 20 7089 5355 / Post: Data Protection & Freedom of Information Officer, University College of Osteopathy, 275 Borough High Street, London, SE1 1JE

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner and you can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: www.ico.org.uk.

Fundraising Preference Service

The UCO is committed to empowering our supporters to manage their information. The Fundraising Preference Service (FPS) enables donors to take control of their charitable giving and conversations; and we want to help you use the service effectively.

The UCO supports the Fundraising Regulator and its efforts to develop the Fundraising Preference Service as a means of rebuilding trust between charities and the public. The Charity is committed to upholding fundraising best practice and being as transparent as possible with our donors.

Document Amendment Record						
Version number	Dates produced and approved (include committee)	Revision Summary	Reason for production/ revision	Author	Location(s)	Proposed next review date and approval required
V1.0	May 2018 SMT	New Document	To comply with new EU data protection legislation (GDPR).	DPFIO	All master versions will be held in: J:\0 Quality Team - Core Documentation Website	May 2020
V2.0	Sep 2020 SMT	Amended wording.	Administrative: To reflect broadening of health care provision.	DPFIO	All master versions will be held in: J:\0 Quality Team - Core Documentation Website	Sep 2023 Or in line with legislative changes.