

# Privacy Statement

## Privacy Statement for *Trinity Alumni Online* (Alumni Interactive Web Services)

### 1. Introduction

1.1 *Trinity Alumni Online* is operated independently of the University of Dublin (hereafter referred to as "Trinity College Dublin") website at [www.tcd.ie](http://www.tcd.ie) and this Privacy Statement only governs activity on the *Trinity Alumni Online* site [insert hyperlink (the "Site")]. References to "we" or "us" in this Privacy Statement refer to Trinity Development & Alumni, Trinity Foundation (hereafter referred to as "**TCD Alumni**") and references to "you" or "members" refer to those who register for or use any of the features available on *Trinity Alumni Online*.

1.2 We at TCD Alumni respect your right to privacy and comply with our obligations under the Data Protection Acts, 1988 and 2003 and any other applicable data protection laws in force from time to time including, with effect from 25 May 2018, the General Data Protection Regulation ("**Data Protection Laws**"). The purpose of this Website Privacy Statement is to:

- (a) outline what personal data we collect from you as a user of Trinity Alumni Online;
- (b) outline how we process any such personal data you provide to us while visiting this website or participating in *Trinity Alumni Online*; and
- (c) to notify you of your own responsibilities with regard to your disclosure and use of personal data while communicating within *Trinity Alumni Online* and when otherwise using the platform.

1.3 Any external links to other websites are clearly identifiable as such, and we are not responsible for the content or the privacy policies of these other websites.

If you do not accept the terms of this Website Privacy Statement you should not use this website or any *Trinity Alumni Online* services which are available on the site. The granting of access to and use of the Trinity Alumni Online platform is subject to the [Terms and Conditions](#). This Privacy Statement is in addition to our [Terms and Conditions](#) and non-compliance by Members with this Privacy Statement shall be treated as a breach of the Terms and Conditions.

### 2. Materials Posted by you in *Trinity Alumni Online*

2.1 Members control the content and availability of information and material they post in *Trinity Alumni Online*. It is up to you as a Member to take all appropriate care to ensure that you are happy with the privacy settings and other individual preferences you choose while participating in *Trinity Alumni Online*. Note that others may search for and contact you through the platform.

2.2 You are not permitted to post personal information about third parties in *Trinity Alumni Online* without their prior consent. This includes any names, personal contact data,

photographs or other identifying characteristics.

2.3 As a general rule, any Materials that you transmit to, or post on, *Trinity Alumni Online* is, and will be treated as, non-confidential and non-proprietary information. Accordingly, you should not use *Trinity Alumni Online* as a depository of any confidential or sensitive information.

### 3. Types of Information Collected by TCD Alumni

3.1 We retain two types of information:

#### (a) "Personal Data"

This is data that identifies you or can be used to identify or contact you and may include your name, student number, degree details, contact details and relevant alumni relations information. The personal data required to apply for a Trinity Alumni Online account is set out below. You can change your settings at any time or supplement your profile with further information if you wish.

**Alumni:** Unless you have opted out of registering with the platform, the platform will contain a pre-populated individual profile for you. The dashboard tab that contains all alumni who have not opted out of the platform is visible to alumni only. This profile will contain your following personal data (if available on our alumni database from TCD Academic Registry and the Trinity Foundation including information obtained by Trinity Foundation from your LinkedIn profile):

- Education info (course name, year graduated, qualification);
- Professional information (company name, title, sector, dates in position);
- Address (note only city and country is used for search purposes and your full address will never be shared with other alumni/students),
- Email (used for 'blind email' communication) to allow other members of the platform to contact you,
- Memberships of clubs, societies and other alumni groups including any alumni regional branch or alumni interest group.

In the event that you do not receive an individual invitation to the Site, the following information is required in order to register with Trinity Alumni Online: first name, surname, date of birth (for verification purposes), email address, student number (if known) and graduation year.

Fields marked on the registration page with an asterisk \* are mandatory in order to register.

You will be requested to create a user name and password and a security question for account verification purposes for resetting password.

If the system is unable to verify your application automatically, your application will be marked for review by our staff and we will use all other information you have provided on the registration page to match any of the following data we have on file such as date of birth,

maiden name, middle name, student number and course name to confirm your eligibility for admission to *Trinity Alumni Online*. Once confirmed you will receive confirmation of your admission to the Site.

**Students:** Your SITS student system user ID and password will be used for account verification purposes. The following information is also required in order to register with Trinity Alumni Online: name, surname, Trinity email address (@tcd.ie) and student number. Fields marked on the registration page with an asterisk \* are mandatory in order to register. Please note that admission by students to *Trinity Alumni Online* shall be limited as described in paragraph 20 of the [Terms and Conditions](#). On graduation, students with a Membership Account will be invited to set up a 'direct access' username and password in order to preserve your account history.

**Staff/Prospective Students/Parents:** Admission to the *Trinity Alumni Online* platform is based on manual registration through the registration page. Fields marked on the registration page with an asterisk \* are mandatory in order to register such as name, surname, date of birth and email address. Your application will be reviewed by an administrator of the platform and if accepted confirmed to you by email.

For student, staff and alumni profiles, we provide functionality to enable you to populate your Membership Account profile with information that is contained on your LinkedIn profile. This is optional and provided for your convenience and by syncing your LinkedIn profile with your Trinity Alumni Online you consent to the downloading of your LinkedIn profile personal data to the *Trinity Alumni Online* platform. Please note that this is a 'one time' download and any further updates you make to your LinkedIn profile will need to be manually synced again with your *Trinity Alumni Online* profile.

Personal data includes user IP addresses in circumstances where they have not been deleted, clipped or anonymised.

#### **(b) "Non-Personal Data"**

Like most websites, we gather statistical and other analytical information collected on an aggregate basis of all visitors to our website. This Non-Personal Data comprises information that cannot be used to identify or contact you, such as demographic information regarding, for example, user IP addresses where they have been clipped or anonymised, browser types and other anonymous statistical data involving the use of our website.

## **4. Purposes for which TCD Alumni holds your Information.**

### **4.1 Non-Personal Data:**

We use the Non-Personal Data gathered from visitors to our website in an aggregate form to get a better understanding of where our visitors come from and to help us better design and organise our website.

### **4.2 Personal Data:**

We will hold and process any Personal Data you provide to us:

- (a) where required for the purpose of making the Trinity Alumni Online service available to you as follows:
- (b)
  - (i) to contact you if required in connection with your Membership Account or to respond to any communications you might send to us;
  - (ii) to administer your registration application and Membership Account (including the Alumni 'Blind&' Email Service unless disabled by you);
  - (iii) to monitor, investigate and enforce compliance with our Terms and Conditions.
- (c) with your consent:
  - (i) where you voluntarily submit or upload additional personal data to your profile (e.g. your address or detailed location) in which case we will use such personal data for the same purposes as outlined above at (a)(i) to (iii) above;
  - (ii) subject to your marketing preferences, to keep you updated about Trinity College Dublin and TCD Alumni's alumni relations and development activities (unless you have indicated a preference not to receive such information in which case we will remove you from applicable mailing lists);
  - (iii) where you respond to a survey at our request (e.g. in the context of our e-Mentoring service).
- (d) for the purpose of our legitimate interests or those of a third party as follows:
  - (i) the support of activities of Trinity College Dublin in connecting with you with requests or details about opportunities such as where the Careers Advisory Services wish to ask for support with student careers planning, requests by our Global Relations Office for support with student recruitment or from Schools for a guest lecture/talk);
  - (ii) keeping our community connected and fostering relationships that may be of interest to you, subject to paragraph 6.3 below and subject to any preferences you have expressed, whereby we make available your information to regional branches, affinity groups, clubs, societies and other groups who may wish to contact you about Trinity College Dublin related activities;
  - (iii) monitoring, investigating and enforcing compliance with our Terms and Conditions;

- (iv) protecting the security of the *Trinity Alumni Online* platform; and;
- (v) protecting the rights of others; and
- (e) for other purposes that are ancillary to the operation of the *Trinity Alumni Online* where those purposes are consistent with this Privacy Statement and our Terms and Conditions.

## 5. Cookies

5.1 This website uses "cookie" technology. A cookie is a text file that is deliberately stored on a user's PC as a result of visiting the website. We may use cookies to deliver content specific to your interests and to save your personal preferences so you do not have to re-enter them each time you connect to our website - our cookies are not available to other websites. Our cookies will record your user information to keep you logged in between screens. You can delete cookie files from your computer at your discretion. Note that if you decline our cookies or ask for notification each time a cookie is being sent, this will affect your use of this website.

## 6. Disclosure of Information to Third Parties

6.1 The *Trinity Alumni Online* site is hosted by TCD Alumni's web services partner, Aluminati Network Group Ltd ([www.aluminati.net](http://www.aluminati.net)) which is based in the United Kingdom. In accordance with applicable Data Protection Laws, TCD Alumni has taken the requisite contractual and other steps to ensure the secure hosting of the services. The Aluminati Network Group Ltd has submitted a voluntary notification to the Information Commissioner. Its membership number is Z8393842. All personal data is handled in accordance with the applicable Data Protection Laws.

6.2 We may provide Non-Personal Data to third parties, where such information is combined with similar information of other users of our website. For example, we might inform third parties regarding the number of unique users who visit our website, the demographic breakdown of our community users of our website, or the activities that visitors to our website engage in while on our website.

6.3 Other than as stated in paragraphs 4.2(d) and 6.1 above, we will not disclose your Personal Data to third parties unless you have put the data into the public domain within *Trinity Alumni Online* or you have consented to the disclosure. We will disclose your Personal Data if we believe in good faith that we are required to disclose it in order to comply with any applicable law, a summons, a search warrant, a court or regulatory order, or other statutory requirement.

## 7. Security

7.1 Your Personal Data is held on secure servers hosted by TCD Alumni, Harris Connect or our Internet service providers within the European Economic Area. Any transfers of your personal data outside the European Economic Area shall be subject to adequate safeguards in accordance with Data Protection Laws. The nature of the Internet is such that we cannot

guarantee or warrant the security of any information you transmit to us via the Internet. No data transmission over the Internet can be guaranteed to be 100% secure. However, we will take all reasonable steps (including appropriate technical and organisational measures as required by Data Protection Laws) to protect your Personal Data and you may request further details from us in this regard by contacting us at the e-mail address set out in Section 9 below.

## **8. Retention**

Due to the systems of deleting backup data, your personal data may reside on our service provider's servers for up to 12 months after the deletion of your Membership Account. However, please note this does not affect the retention of any personal data processed by TCD Alumni prior to or outside the provision of the Trinity Alumni Online service, which shall be subject to TCD Alumni's data protection policy.

## **9. Updating, Verifying and Deleting Personal Data and Your Rights under Data Protection Laws**

9.1 The "Personal" section of the *Trinity Alumni Online* site enables you to control, manage and update the particulars of your own personal data. In addition, you may inform us of any changes in your Personal Data, and in accordance with our obligations under Data Protection Laws we will update your Personal Data accordingly. To find out what Personal Data we hold on you or to have your Personal Data updated, amended or removed from our database, please review your profile at *Trinity Alumni Online* or contact us at [alumni@tcd.ie](mailto:alumni@tcd.ie). You may delete your profile at any time by using the settings on your account.

9.2 If you feel your personal data has been used in breach of our Terms and Conditions, please email us at [alumni@tcd.ie](mailto:alumni@tcd.ie). While we cannot accept liability for the acts of our Members, material breaches of data protection or privacy laws will be investigated by us.

9.3 Where we process your personal data on the basis of your consent as set out above at paragraph 4.2(c) you have the right to withdraw your consent at any time which you can effect by adjusting your account settings, the level of optional data contained on your profile and preferences accordingly.

9.4 You shall have the right under the General Data Protection Regulation (from 25 May 2018) to raise objections in relation to the processing of your personal data (for example if you have a personal objection to processing for the purpose of our legitimate interests) or a right to restrict processing in certain instances (e.g. pending resolution of an objection as previously noted). In limited circumstances other than an update or change to your personal data as outlined above, you also have the right to request the rectification or erasure of your personal data. In addition, you may have the right to have your personal data that you provided to us transmitted to another controller in a structured, commonly used and machine readable format.

Any such queries, objections or requests should be directed to [alumni@tcd.ie](mailto:alumni@tcd.ie) and will be processed in accordance with applicable Data Protection Laws. In the event that your query or request has not been resolved to your satisfaction, you have the right to raise the matter with the Office of the Data Protection Commissioner.

## **10. Changes to the Privacy Statement**

10.1 Any changes to this Privacy Statement will be posted on this website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We may process your personal data for purposes which are compatible with those set out in this Privacy Statement where permitted by Data Protection Laws. If at any time we decide to use Personal Data in a manner significantly different from that stated in this Privacy Statement, or otherwise disclosed to you at the time it was collected, we will notify you by email, and you will have a choice as to whether or not we use your information in the new manner.