Data Protection Statement

Trinity Development & Alumni
1 Data protection statement for alumni and supporters

1.1 Introduction

This privacy notice explains how Trinity Development and Alumni (TDA) handles and uses the personal data it collects about Trinity College Dublin’s (The University) alumni and past, current and future supporters, whether donors, volunteers or participants in membership groups. When collecting this information, TDA acts as a data controller and will therefore provide below, in line with the General Data Protection Regulation (GDPR), all necessary information on how it collects personal information about you, the purpose for which it is used and how you can interact with us.

1.2 Scope

We are committed to protecting your personal information and being transparent about what information we hold. In light of the General Data Protection Regulation enacted by the Data Protection Bill 2018, we have updated this policy to set out the steps taken to ensure your privacy is upheld. As a legal basis for compliance under GDPR, we rely on Legitimate Interest to conduct our processing activity. This has been identified as the rightful legal basis, after carrying out a Legitimate Interest Assessment, whose outcome has deemed necessary the processing of information to ensure the TDA’s functionality. The following notice sets out how TDA uses personal data for alumni relations and fundraising purposes.

2 Who we are

2.1 Trinity Development and Alumni

TDA, administered from the offices of Trinity Foundation, is responsible for supporting the University’s ambitious educational, research and outreach programmes and maintaining a connection between the University and its alumni & friends. Our Head Office is located in East Chapel on Trinity College campus in Dublin 2. TDA can be contacted by post at the above address, by email at alumni@tcd.ie or by phone on +353 1 896 2088.

2.2 Data Privacy Officer

TDA has appointed a Data Privacy Officer to ensure compliance with all aspects of the GDPR. TDA’s Data Privacy Officer oversees how the organisation collects, uses, shares and protects your information to ensure your rights are fulfilled. The Data Privacy Officer can be contacted at alumni@tcd.ie.

3 Personal data held by TDA

The majority of data held by TDA is directly provided by alumni and non-alumni. If you are a student or studied at Trinity College Dublin, some of your personal data is transferred from your student record to our alumni database, providing you did not opt-out of this process upon registration with the college.

Alumni records contain:

- details of education;
- unique personal identifiers and biographical information;
- contact details;
• details of interactions with the University and Colleges, including:
  o membership of clubs, societies, and alumni groups
  o attendance at College or University events
• relationships with other alumni or supporters of the University;
• marital status, spouse/partner name;
• personal data provided for a specific purposes;
• communication preferences, to help us provide tailored and relevant communications.

We also record, where applicable, based on information provided and, in some cases, publicly available information and other information, including:

• history of donations made to TCD and TDA;
• ability and willingness to make donations;
• philanthropy and in-kind giving;
• career highlights and other life achievements.

We will at times supplement your information with research, where necessary. We will only use reputable sources to do so, such as Public sources, CRO, etc.

4 How long we keep your information

To meet our legal and regulatory obligations, we hold your information since you become an alumnus or a supporter of TDA. We do not hold it for longer than necessary.

5 How we use your data

Your data is used for a number of interdependent purposes in support of alumni relations, supporter communications and fundraising. These include:

• sending you publications;
• conducting surveys;
• providing you with details of services, including access to TCD facilities and alumni email accounts;
• sending you tailored proposals, appeals and requests for donations;
• sending you details of volunteering opportunities;
• inviting to alumni and other University events;
• research in order to improve our understanding of our alumni and supporters, inform our fundraising strategy and target our communications more effectively;
• internal record keeping, including the management of any feedback or complaints;
• administrative purposes.

From time to time, we will share your data with Third Parties engaged by TDA to provide services to facilitate the following:

• Send email communications about our services, including events and relevant alumni activity;
• To help us conduct Phone Campaigns to engage with alumni;
• For mailing out our Trinity Today magazine;
• To conduct fundraising appeals.
We have a contract with each Third Party that protects your rights to privacy. Before seeking or accepting major donations we are required to conduct due diligence, including reviewing publicly available personal data relating to the donor's criminal convictions and offences.

Communications to you may be sent by post, telephone or electronic means (principally email), depending on the contact details we hold and the preferences expressed by you about the types of communications you wish to receive.

If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us using the details listed below.

We may use manual analyses to link data together to help us identify your potential for supporting the University, to send communications which are relevant and timely, to identify volunteering opportunities or opportunities for providing support, and to avoid approaching you with opportunities which are not of interest. All of this enables us to raise more funds, sooner, and more cost-effectively, in support of the University’s strategic research and teaching objectives. TDA always seek to ensure that any opportunities we present are aligned with your interests, based on the research we conduct.

TDA will always respect a request to stop processing your personal data, and in addition your statutory rights are set out below.

6 How we protect your data

TDA ensure we have appropriate data sharing agreements in place before using your personal data. We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them.

Any transfers of your data overseas (outside of the European Economic Area), for example to an international alumni organisation, as set out above, are protected either by an 'adequacy decision' by the European Commission (declaring the recipient country as a 'safe' territory for personal data) or by standard contractual clauses adopted by the European Commission (which give obligations for the recipient to safeguard the data) or, before 25 May 2018, based on the University's self-assessment of the risks involved with the transfer and its determination that the data will be adequately protected during and after the transfer.

7 Your rights

Under the General Data Protection Regulation, you have the right to:

- Be informed;
- Access information;
- Rectification;
- Erasure;
- Data portability;
- Object to processing of personal data;
- Restriction;
- Object to automated decision, including profiling.
7.1 **Your rights over your information**

You can at any time request a copy of the information TDA holds about you. You may also correct it if it is inaccurate. You can additionally request us to stop using your information. This request can be lodged with any staff member of TDA, primarily through alumni@tcd.ie or 01 8962088. When exercising this right, you will be asked to file a Data Subject Access Form, which will be made available to you by TDA, to ensure the request will be handled within a set timeframe and respecting the current legislation.

7.2 **Your right to complain**

If you have a complaint about the use of your personal information, please us know and we will take the appropriate actions to rectify the situation.

8 **Further information**

We always handle your personal data securely and minimise its use, such that there is no overriding prejudice to you by using your personal information for these purposes. In addition, there is no statutory or contractual requirement for you to provide us with any personal data.

Please contact us at alumni@tcd.ie if you have any concerns or questions about the above information or you wish to ask us not to process your personal data for particular purposes.

We will retain your data indefinitely in support of your lifelong relationship with the University or until you request us to do otherwise. We will publish on our website any changes we make to this data protection statement and notify you by other communication channels where appropriate.

You can always find an up-to-date version of this notice on TDA’s website at www.tcd.ie/alumni. You can also request a paper copy by contacting TDA directly.