



Royal College of Art

Postgraduate Art & Design

Data Protection and Alumni Data Fair Processing Notice Summary

Summary

For the purpose of the Data Protection Act (2018), the RCA Alumni Network will be the data controller in regards to data processing of Alumni data and will make decisions about how we use any personal data we collect from you.

As an enrolled student, you are automatically part of the Alumni Network when you graduate. The Development & Alumni Relations Office collect and use data relating to personal details, family and social circumstances, education and training records, along with employment information, if you choose to share this with us.

The principle purpose for processing your personal data is for us to deliver alumni services to you. To do this, we process your personal data based on our legitimate interests. We also offer some features including events and promotions based on your consent.

Other purposes for which we process your personal data include:

- To meet our statutory or legal obligations
- To offer additional support following graduation
- In the fulfilment of our public tasks

You have rights associated with how your personal data is used and managed. These rights include:

- To be informed what personal data about you the College holds and what it is used for
- To access your personal data
- To update the personal data the College holds about you
- To be informed how the College is complying with its obligations under the Act;
- To complain to the Data Protection Officer or Information Commissioner (ico.org.uk)
- To have personal data erased where there is no compelling reason for us to keep the data.

The Data Protection Act 2018 (The Act), regulates the processing of personal data of Data Subjects ('you') in any format by the Royal College of Art and the Development & Alumni Relations Office, including digital and hard copy personal data. Personal data is any information relating to a living individual, and processing is any activity carried out involving personal data, including collecting, holding, viewing and storing it.

Our alumni and supporters are extremely important to us, and this Privacy Notice explains how The RCA Alumni Network collects, stores, manages and protects your data. It outlines the types of data that we hold and how we use them to provide services to our alumni and supporters. We aim to be clear when we collect your personal information, and not do anything you would not reasonably expect.

This Fair Processing Notice is designed to give you information about what personal data we collect, what we do with your data, why we do it, and your rights in relation to its use.

During the course of our activities, the College will collect, store and process personal information about our prospective, current and former students.

While most of this data is collected from you directly, we could also collect your personal data:

- By observation e.g. through your use of our IT equipment, technology, or connected devices
- By deriving your personal data from combining other data sets

For the purposes of this Fair Processing Notice, 'students' refers to your interactions with us at the application stage, at enrolment, at graduation and throughout the period of study.

We treat all alumni personal data in line with the data protection principles. No personal data held by us will be processed unless the requirements for fair and lawful processing are met.

Types of Personal Data Processed

The records we hold are limited to what is necessary for us to provide you with an Alumni Service. The types of data processed for this purpose include:

- Education data such as course, module and progression data
- Contact details including name, telephone number, address and email address
- Employment status, career progression and other achievements
- Previous contact and relationships with the College since graduation
- Donation and fundraising activity you have been involved in are also recorded.

In some cases, other information is collected:

- Special categories of data you provide for a specific purpose (e.g. disability or dietary requirements for event management purposes)
- Information about your family and other relationships
- Financial data
- Information about your areas of interest and potential to support the College.

Your personal data is used for the following purposes:

- For the purpose of keeping you informed of alumni events
- To keep track of your interest in donating to the College
- To provide you with updates about College and Alumni activities

This is not an exhaustive list, but is intended to communicate an overview of our purposes.

Lawful Basis

All processing of personal or special category data requires us to have a lawful basis for doing so. As an alumnus, our principal lawful basis for processing your personal data in relation to our legitimate interest to provide you with the alumni service. In some cases, we will rely on processing using another lawful basis such as:

- Under a legal obligation for example, disclosing personal data to external parties under statutory powers
- Where it is necessary to protect your vital interests such as providing emergency medical care
- Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority (for example, awarding qualifications, or for a HESA submission)
- Where it is necessary for the performance of a contract

Where any of these lawful basis do not apply, we will seek your consent or explicit consent to process your personal data. In this case, you have the right to withdraw consent at any time with no detriment to you.

Where we process special category data, we are required to rely on a separate lawful basis specifically for that personal data. The lawful basis we choose will be dependent on the circumstances associated with that processing but in many cases the processing will take place on one of more of these bases:

- With your explicit consent
- As part of our legal obligations under employment, social protection or social security law
- Reasons of substantial public interest
- In the establishment, exercise or defence of legal claims
- In the interests of public or occupational health

- For scientific, historical research or archiving purposes

How We Keep our Data Accurate

We always strive to keep our data as accurate as possible so we really appreciate it when you keep us up to date with your most recent contact details. You can do this online, by email, post or telephone.

We may also consult alternative and publicly available sources in order to undertake data accuracy checks, such as: Royal Mail National Change of Address database (NCOA); BT Operator Services Information System (OSIS) and wealth intelligence databases. We may also from time to time review the employment information we hold for you through publicly available information such as social media, newspaper articles and publications, company websites and Companies House. Where we appoint an external party to undertake a screening of information, any such arrangements will be subject to a formal agreement between RCA and that organisation, to protect the security of your data.

We occasionally conduct research to help us understand our alumni, supporters and potential supporters. This may include gathering information from publicly available resources, to give an insight into your philanthropic interests and ability to support the College. This is sometimes referred to as 'wealth screening'.

From time to time, we may also conduct some analysis of our data to help us understand our alumni and supporters, to ensure we are efficient and that only relevant communications are sent to you. This may include assigning a score calculated using personal data and how engaged with us you have previously been. Tools may be used to monitor the effectiveness of our communications with you, including email tracking, which records when an email from us is opened and/or how many links are clicked within the message.

Contacting You

If you provide us with contact details for a particular method of communication we will assume that you have given us your consent for us to update your record and communicate with you using this information, unless you have told us otherwise. Contact details provided directly by you will update any previous preferences in relation to this channel unless you inform us otherwise. If you are registered with the Telephone Preference Service (TPS) but provide us with a telephone number, we will verify if you provided us with your telephone number before or after registration with the TPS. In the event of providing us with your telephone number after registration with the TPS, we will take this as a positive indication of consent to contact you on that number.

Fundraising is a key part of the Alumni Network's work, and we are committed to working in a transparent, ethical, responsible and honest way. To reflect this

commitment, we are a member of the Fundraising Regulator and committed to the Regulator's Code of Practice.

Protecting your Data

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 2018. Your data are held on a database hosted on a secure server within the College network. This database is protected by multi-level authentication and access is restricted to individuals who need to see the data to carry out their duties at the College. This is limited to: members of staff in the Alumni Network; assigned IT support; and colleagues from other areas within the College who work closely with us on the provision of services to alumni and supporters, such as the Careers Service. User access rights to the database are restricted according to individual job roles in order to ensure that users only see information relevant to them. This access is reviewed on a regular basis.

Sharing your information

We need to share your data with third parties outside of the College who are contracted to work on our behalf, for example to pension providers, insurers or legal consultants. We also disclose data to auditors undertaking investigations or to selected individuals acting on behalf of RCA such as organisations undertaking market research or academic researchers provided no personal data is published. Wherever possible sharing of your data will take place within the European Union, however where this is not possible, we may share your data outside the European Union (a third country) but this sharing will be proportionate, have a lawful basis and be subject to appropriate safeguards including contractual agreements and technical measures.

Individual Rights

You have rights associated with how we, or any organisation, use your personal data. These rights are:

- The right to request access to your personal data
- The right to have inaccurate or incomplete personal data rectified
- The right to erasure of personal data – this will only apply where there is no legitimate reason for RCA to continue to process the personal data
- The right to restrict the processing of personal data – you have the right to block the processing of your personal data by us in some case
- The right to data portability – you have the right to have the personal data you have provided to us transferred to another organisation
- The right to object – you can object to the processing of your personal data by RCA in certain circumstances, including the sending and receipt of direct marketing material and

- The right to object to automated decision making and profiling – you have the right to object to decisions taken by automatic means without human intervention in some circumstances.

These rights are not absolute in every circumstance and a number of factors such as exemptions in law apply.

The RCA is the Data Controller for all personal data that it holds and processes about you. Our contact details are:

Data Protection, Records and Information Manager
Royal College of Art
Kensington Gore
London SW7 2EU

If you are unhappy with our handling of your personal data, or believe that the requirements of the Act (or any legislation arising directly from it) may not be fully complied with, please contact the Data Protection Officer in the first instance. The formal complaint procedure will be used if appropriate, and you have the right to submit a complaint to the Information Commissioner's Office. Further details can be found at ico.org.uk.