

## Alumni, Donor, and Supporter Privacy Notice

### What is a Privacy Notice?

This privacy notice tells you what to expect us to do with your personal information when you enquire, donate to, or support the Trust. Personal information (or personal data) is any information that relates to and identifies you. Data protection legislation (the General Data Protection Regulation (GDPR) and the Data Protection Act 2018) set out how we should handle your personal information.

In most instances, when you become an alumnus/alumna, donor, or supporter of the Scotland College of Chiropractic, we will collect data directly when engaging with you; or when you provide it to us via our sign-up form, face to face meeting, letter, online updates or email.

### Who We Are?

We are The Scotland College of Chiropractic, 124a Raeburn Place, Edinburgh, EH4 1HG. Our telephone number is 0131 322 1978 and our email address is [office@scotlandcollegechiro.ac.uk](mailto:office@scotlandcollegechiro.ac.uk). For the purposes of processing your personal data, we are the Controller.

### What Personal Data Will We Use?

Alumni, donors and supporters play an important role in the future of the College. We are here to keep you informed as to what is happening at the College, and beyond; such as engaging with you on relevant activities which we hope will be of interest to you. This includes sharing news and activities, events, and fundraising campaigns.

### As an alumnus/alumna the information we will process about you may include the following:

When you complete your course, you automatically become a member of the Scotland College of Chiropractic Alumni Network and will be provided with information about our services. To offer you an alumni service we will use information about you from your student record such as name, contact details, course information, etc. as well as information you provide directly to us. This information will be added to our (future) CRM system to enable us to provide our alumni programme.

The information we will process about you will include the following:

- Name(s); title; gender; preferred pronoun; nationality; date of birth; name changes.
- Contact details include any email addresses we have for you; postal address (home or parental); telephone number; mobile number; and links to social media accounts.
- Information about your time at the College and other academic institutions, including other qualifications or courses studied as well as membership of clubs and societies, and class medals, or awards.
- Your occupation and professional details.
- Records of donations and Gift Aid status (where applicable).
- Records of communications sent to you by the College.
- Information on the engagement you have had with the College eg events attended; networks involved in; volunteering (e.g. mentoring, masterclasses, providing placements etc); donations made; fundraising activities.
- Publicly available information such as that available on the internet. For example, we may search for you to obtain your professional contact details if we no longer have a valid email address for you.
- Case study information and associated images, along with a record of the consent you have given us to use this information.
- Up-to-date business information and contact details shared through other activities such as attendance at conferences, and other CPD events.

**As a donor and supporter, the information we will process about you may include the following:**

- Biographical information such as name, title, date of birth, and gender.
- Contact details including address(es), email address(es), and phone number(s).
- Professional activities; current interests and preferences.
- Business and career details including your philanthropic propensity and capacity to aid meaningful fundraising.
- Records of donations and Gift Aid status (where applicable).
- Records of communications sent to you by the Trust
- Information on the engagement you have had with the Trust eg events attended; networks involved in, donations made; and fundraising activities.
- Publicly available information such as that available on the internet. For example, we may search for you to obtain your professional contact details if we no longer have a valid email address for you.

**Why Do We Use Your Personal Information?**

**As an alumnus/alumna we may use your personal information:**

We use information about you to offer you an alumni service which includes keeping you informed about SCC news, publications and events, career opportunities, and professional development opportunities. We also use information about you to

process gifts or donations you have given us and to manage and administer services we make available to our alumni.

We will also use your information to support our fundraising and charitable programmes. We do not undertake 'wealth screening' but we will analyse the information we hold about you in our (future) CRM to help us to decide which of our alumni to contact about particular opportunities to contribute to our fundraising activities. We will also use your information to send you messages about our fundraising events and charitable programmes.

We will use your information to communicate effectively with you via post, email, telephone, text (SMS), social media, or other methods as appropriate, obtaining your prior consent to do so by asking you to opt into communications, where required. You can opt out of receiving communications that are considered to be marketing (including fundraising communications) by updating your communication preferences with us, as not all of the communications we send are marketing.

We also use your information to compile statistics and for research, surveys, and market research to help with corporate planning, reporting, and College administration.

### **As a donor and supporter, we may use your personal information to:**

The College will communicate SCC activities, institutional views, and the latest news and events with stakeholders, supporters, and donors, and current and past supporters of the College, and to raise philanthropic funds. We will use your information to carry out all of these activities.

We will also use your information to support our fundraising and charitable programmes. We do not undertake 'wealth screening' but we will analyse the information we hold about you in our (future) CRM system to help us to decide which of our donors and supporters to contact about particular opportunities to contribute to our fundraising activities.

We will also use your information to keep you informed as to what is happening at the College and beyond: engaging with you on relevant activities that we hope will be of interest to you. This includes sharing College, alumni and supporter news and activities, events, fundraising campaigns, networking, and volunteering, including via email.

### **What is the Lawful Basis for this Processing?**

The College relies on the following lawful bases from the GDPR to process information about you for the purposes set out in this notice:

**Article 6(1)(e)**, which allows us to process personal data where it is necessary to perform a task in the public interest. Research and some internal reporting and monitoring is carried out as part of our public tasks. We may also rely on this lawful basis to process personal data where it is necessary for the public tasks of other organisations, such as when we disclose information to HESA.

**Article 6(1)(f)**, which allows us to process personal data where it is in our, or someone else's, legitimate interests to do so and it does not unduly prejudice your rights and freedoms. We rely on this lawful basis for the majority of our alumni, donor and supporter activities including, among other things:

Communicating marketing messages to you (unless you opt out). It is in the College's legitimate interests to carry out fundraising activities and to promote its services, courses, and events to those who may be interested.

Delivering services and facilities to you associated with your status as an alumnus, such as CPD opportunities and the alumni network. For example, it is in the interests of you, our alumnus, to have access to CPD opportunities to enhance and support your career.

Analysing the data we hold about our alumni, donors, and supporters to determine who to contact about specific fundraising activities or charitable programmes, or other activities and events associated with SCC.

Produce some internal reports, research and statistics. It is in our legitimate interests to use these to evaluate, plan and assess how the alumni and fundraising service and the College is operating and make any changes we think are appropriate and will benefit alumni and current and future students.

We also process some information only if you provide your consent, for example case studies and images. In this case, **Article 6(1)(a)** applies, and **Article 9(2)(a)** applies where the information is special category data (special category data is information about your race, ethnic origin, political opinions, religious beliefs, trade union membership, genetic data, biometric data used for ID purposes, health, sex life or sexual orientation). It will be clear where we are relying on your consent to collect and use your information because consent will be requested at the time you provide the information. When you are asked for consent, we will explain why we are asking for the information and how we will use it if you choose to provide it. Consent can be withdrawn at any time and we will explain how you can do this in each individual case.

Where we process special category data for the purposes set out in this notice, we rely on the following lawful bases from the UK GDPR and DPA:

**Article 9(2)(g) UK GDPR**, which allows us to process special category data if the processing is necessary in the substantial public interest and there is a basis to do so in law. The law which allows us to rely on this basis is **section 10 DPA** by virtue of **Schedule 1 DPA**.

**Article 9(2)(j) UK GDPR**, which allows us to process special category data for archiving, scientific or historical research purposes or statistical purposes, where there is a basis to do so in law. The law which allows us to rely on this basis is **section 10 DPA** by virtue of **Schedule 1(4) DPA**.

## Sharing Your Personal Data

We will not share your personal data.

## Retaining Your Personal Data

We consider our relationship with alumni, donors, and supporters to be lifelong so all records are retained indefinitely and continually updated.

## Your Rights

As we process your personal data, you have certain rights. Further information about each of these rights can be found on the Information Commissioner's Office website – [Information Commissioner's Office \(ICO\)](#).

- You have the right to ask us for copies of your personal information. This right always applies.
- You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.
- You have the right to ask us to erase your personal information in certain circumstances.
- You have the right to ask us to restrict the processing of your information in certain circumstances.
- Your right to object to the processing we carry out if we carry it out on the basis that it is in our legitimate interests. You also have the right to object to your personal information being used for direct marketing purposes.

In addition to the above:

You may request a copy of your data at any time. Please make such a request in writing or by email to Dr Ross McDonald, Interim Principal at: [ross@scotlandcollegechiro.ac.uk](mailto:ross@scotlandcollegechiro.ac.uk). Please provide the following information: your name, address, telephone number, email address and details of the information you require.

If you believe any of the personal data, we hold on you is inaccurate or incomplete, please contact us directly and any necessary corrections to your data will be made without undue delay.

Where you have provided explicit consent for us to use your data you have a right to withdraw this consent at any time.

## Data Breaches

Should your personal data that we control be lost, stolen or otherwise breached, where this constitutes a high risk to your rights and freedoms, we will contact you without delay. We will give you the contact details of the Data Protection Officer who is dealing with the breach, explain to you the nature of the breach and the steps we are taking to deal with it.

## Should You Wish to Complain

You can contact Ross McDonald, DC, Interim Principal if you have concerns about or wish to make a complaint about the way we are processing your data at: [ross@scotlandcollegechiro.ac.uk](mailto:ross@scotlandcollegechiro.ac.uk).

### **Automated Decision Making and Profiling**

We do not use any system which uses automated decision making or profiling in respect of your personal data.

### **How We Obtained Your Data**

Your personal data has been collected directly from you, via online registration process to attend an event or other, through online requests for information or in person at an event, face to face at a meeting, or via a telephone call.