



# College Conference Privacy Notice

## 1. Introduction

Members of our 'College Conference' are extremely important to us, and this Privacy Notice explains how Spurgeon's College 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 you. It also outlines what steps you can take if you would like us to change how we use your data or if you would like us to stop using it altogether.

The College is the 'Data Controller' of your personal data and is subject to the General Data Protection Regulation 2016 (GDPR). We are registered with the Information Commissioner's Office (ICO).

## 2. Our responsibilities and the legal basis for processing your data

The College collects information about you over the course of your time with us. On completion of your course this information is used by us to continue our relationship with you, through 'College Conference'.

Spurgeon's College is committed to protecting your personal data. We aim to be clear how we use your personal information, and not do anything you would not reasonably expect. We are the data controller for all the personal data we hold and process, except where we use data in the capacity of a data processor on behalf of another data controller.

All information you provide to us will be used in accordance with the College's Data Protection Policy (A copy of this policy is available from the Director of Operations). Your personal data will be stored securely in our database which is part of Spurgeon's IT infrastructure and held in accordance with the Data Protection Act 1998.

Spurgeon's College processes the information outlined in this privacy notice for the purposes of:

- Communicating with students, staff, alumni, and current and potential supporters
- Providing benefits and services to students, staff, alumni and supporters
- Furthering the College's educational charitable mission (which includes fundraising and securing the support of volunteers)
- Enabling the College to achieve its strategic and operational goals
- Administrative purposes (e.g. processing donations or gift aid).

The College relies on your consent as the legal basis for processing, where this is not overridden by the interests and rights or freedoms of the data subjects

concerned. We recognise that this is not the only lawful ground for processing data. As such, where appropriate, the College will sometimes process your data on an alternative legal basis – for example, to fulfil contractual obligations we may have when you make a purchase from us.

### **3. How do we collect personal information?**

The vast majority of the information we hold is obtained directly from you. All student names, academic qualifications and contact details are held on the College's student records database and used to create a record for you as a Conference member.

We obtain personal information from you when you graduate, enquire about our activities, register for an event, make a donation to the College or otherwise provide us with personal information.

### **4. What personal information do we collect?**

Spurgeon's College collects information about you when you complete your enrolment form, and throughout your time at the College.

Spurgeon's College maintains a record of all former students and, as such, we hold education records in perpetuity.

The personal information we will collect and process will include name, date of birth, contact details including email address and mobile number. The information we collect might also include career and employment history, areas of interest and potential interest, details about propensity to volunteer and/or to support the College financially through charitable donations. If you make a donation to the College, or pledge a donation to the College, we will also record your donation and/or pledge details on your record, including Gift Aid status, where applicable (as required by HMRC).

We will keep a record of contact with you and your attendance at College events or activities. We will also keep a note of any changes you tell us about, including when you change your address, or name. You can keep your personal and employment details up to date by contacting [enquiries@spurgeons.ac.uk](mailto:enquiries@spurgeons.ac.uk).

We also collect information by tracking which pages you visit when you click on links to our website in our emails, and may use this information to personalise the way our websites and emails are presented to you (see our Website Privacy Policy).

The College does not store any credit/debit card details and is fully PCI-DSS compliant.

### **5. How do we use your personal information?**

We will only process your data for the specific purposes that we tell you and then only to the extent necessary for that specific purpose.

Your personal information will be used to provide any services you have requested and to keep in touch with you as a member of College Conference. We may communicate with you about the following:

- College updates and news
- Publications
- Invitations to events
- Ways to get involved
- Conference prayers
- Fundraising
- Services you have requested or that may be of interest
- Administrative purposes

We will ask for your consent to contact you for specific purposes and will only contact you through the communication channels (telephone, email, post or social media) you have consented to. Unless you have requested otherwise, your data is used and processed for the full range of supporter activities and programmes and all relevant communications, fundraising and marketing activity. Note that we may have to contact you for a reason where your consent is not required, for example to comply with the law, or to fulfil a contractual obligation.

Contact details provided directly by you will update any previous in relation to this channel unless you inform us otherwise. If you are registered with the Telephone Preference Service (TPS) and provide us with a telephone number you have consented for us to use, we will call you on this number. We will not use any channel of communication which you have not consented to.

Your data will not be disclosed to external organisations other than those acting as agents for the College. We always make sure there are appropriate controls in place so that your data will remain secure. We will never sell, trade or give away your data.

We may use third-party partners to support the activities described above. If you interact with the College through a third party (for example, supporting Spurgeon's via 'JustGiving') then we may obtain information about you from that third party. The receipt of data in this manner is subject to the third party's own privacy policy. A list of parties with whom we partner in this way is available on request. Data obtained in this way are treated no differently to any other once held by the College, and are bound by the terms of this Privacy Notice as soon as they are received.

Tools may be used to help us improve the effectiveness of the College's communications with you, including tracking whether the emails we send are opened and which links are clicked within a message. We monitor (using cookies) website visits and use tools such as Google Analytics to improve our website and services. Further information on cookies, and how to disable them if desired can be found in our Website Privacy Policy.

We may analyse the personal information we collect to create a profile of your interests and preferences so that we can contact you in the most appropriate way and with the most relevant information. We may also use your data to help plan our supporter engagement activity and fundraising. This may include wealth screening whereby publically available information (for example press cuttings, the Charity

Commission Register), together with information from third party suppliers, could be used to assess capacity to provide philanthropic support to the College. Wealth screening enables us to understand the background of our alumni and other stakeholders, and to make appropriate requests to those who may have the means and the inclination to give more.

We do not use your personal information to carry out automated decision-making processes.

## **6. Who do we share your personal information with?**

Unless we have a legal obligation to do so, we will not disclose your data to individuals, organisations or other entities outside the College other than those which are acting as agents for the College (for example, if we use a company to print and send out documents). We do not sell to or trade your data with any other organisations.

The College has a legal obligation to supply some of the information we hold about you, as a graduate, to the Higher Education Statistics Agency (HESA) – the official agency for the collection, analysis and dissemination of quantitative information about higher education in the United Kingdom. HESA will treat your data in line with its collection notices. HESA produces official statistics (such as university league tables) and its outputs are regulated by the UK Statistics Authority, which has a direct line of accountability to Parliament.

We may need to disclose your information to a third party if required by law (for example to government bodies and law enforcement agencies) or if we have your permission to do so.

## **7. International data transfer**

Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the European Economic Area (EEA). This may occur if, for example, one of our trusted partners' servers are located in a country outside the EEA. Where these countries do not have similar data protection laws to the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law.

## **8. How do we protect your personal information?**

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 1998. Your data are held on a database hosted on a secure server within the College's IT network.

We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions contained within a contract, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

We have put in place procedures to deal with any suspected data breach. If you suspect a data breach has occurred at the College, the organisation has a duty to report this to the Information Commissioners Office (ICO) within 72 hours. Please report suspected data breaches to the Data Protection Officer as soon as you can.

## **9. How long do we keep your personal information?**

Spurgeon's College considers its relationship with Conference members to be lifelong, and we will hold your details until you tell us you no longer wish to hear from us. Generally, we will process your personal data only as long as is necessary for the purpose(s) for which it was collected (unless otherwise advised) and in accordance with the College's records retention schedule. We may be obliged by law to keep your data for a certain length of time e.g. HMRC requires we record your name, address and Gift Aid declaration for six years from the date of your last donation. Data will be kept securely and destroyed appropriately when no longer required. The College may also decide to archive some data.

## **10. Your rights and how to contact us**

We will always try to ensure that the data we hold for you are up to date, reasonable and not excessive. In certain circumstances, by law you have the right to:

- Be informed as to how we use your data (via this Privacy Notice)
- Access or request a copy of the data we hold about you
- Update, amend or rectify the data we hold about you
- Change your communication preferences at any time to restrict how we process your data, or opt out of some or all communication from us
- Ask us to remove your data from our records
- Withdraw consent, where it is used as a legal basis for processing
- Object to or restrict the processing of your information for any of the purposes outlined above.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you have any questions about this Privacy Notice, your data rights, or would like to receive a copy of the information we hold about you, please contact:

Rev Helen Stokley  
Data Protection Officer  
Spurgeon's College  
South Norwood Hill  
London  
SE25 6DJ  
dpo@spurgeons.ac.uk      +44 (0)20 8653 0850

If you feel that we have let you down in relation to your information rights then please contact us so that we can discuss this with you and rectify the situation.

You can also make complaints directly to the Information Commissioner's Office (ICO). The ICO is the independent authority upholding information rights for the UK. Their website is [ico.org.uk](http://ico.org.uk) and their telephone helpline number is 0303 123 1113.

From time to time, we may use your information for new purposes not currently described in this Privacy Notice. If our information practices change at some time in the future, we will always post the policy changes on this page.

<b>Document control box</b>			
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