

THE OPEN UNIVERSITY

ALUMNI AND SUPPORTER PRIVACY POLICY

Contents

Summary of policy	2
Summary of significant changes since last version	2
Scope	2
What this document covers	2
Related documentation	2
Policy	2
1. Who we are	2
2. How we collect and hold your personal information	2
3. How we use your personal information	3
4. Processing your donation	4
5. When you support us via a third party	5
6. Our suppliers and service providers	5
7. Where we store your personal information	5
8. How long we keep your personal information for	5
9. Our legal basis for contacting you and using your personal information	5
10. Your (data subject) rights:	6
11. Contact us	6

Summary of policy

Our alumni and supporters are at the very heart of The Open University community. This privacy policy sets out how the Development Office obtains, manages, uses and protects your data and relates specifically to information held by the Development Office.

Summary of significant changes since last version

There are a number of significant changes from the previous version of this policy, last updated in May 2017. These are:

- a) Change of policy name to Alumni and Supporter Privacy Notice
- b) Addition of information required by the General Data Protection Regulation

Scope

What this document covers

This document applies to you if you have achieved a qualification with The Open University, are a member of our Alumni Association, are a supporter or have been identified as a potential supporter of The Open University, including as representatives of a Trust or Company, current and past students.

It details:

- what kind of information The Open University Development Office collects about you when you become an alumnus, supporter or are identified as a potential supporter
- How The Open University Development Office will use information we collect about you
- Whether The Open University Development Office will disclose your details to anyone else
- Security and retention of personal data

This document will be updated from time to time in order to ensure compliance with data protection legislation.

Related Documents

For more information, see also our [Privacy and Cookies page](#).

The Policy on the retention of [alumni data](#) and records sets out the principles for how long we keep alumni data.

Policy

1. Who we are

The Open University Development Office (OUODO) keeps in touch and is responsible for the relationship with University alumni, friends and supporters.

The Open University is the data controller in relation to the processing activities described below. This means that The Open University decides why and how your personal information is processed.

Where this policy refers to “we”, “our” or “us” below, unless it mentions otherwise, it’s referring to The Open University

2. How we collect and hold your personal information

If you studied at The Open University and gained a qualification, we use some information from your student record to communicate with you, as a member of the University’s Alumni Association. This includes information such as your name, date of birth, contact details and educational history with the University. This information is copied across from your student record and used to create a record on the University’s alumni database.

Much of the data we hold comes directly from you – this includes information you may have given to the OU when you were a student and subsequently, for example we add information about any contact we have with you, any donations you make to us, responses to alumni surveys, volunteering your time and any Development Office events you attend.

In the past we have also worked with other companies to screen alumni records, in order to help us segment our audience and to understand appropriate fundraising approaches. We no longer work with these companies but do continue to hold some limited details from these screenings on our database to help inform our data selections.

We also hold records on individuals who are not alumni of The Open University, including some current or past students, but who we have identified as being sympathetic to the mission of the University or have a known affinity to it. This includes supporters who have become actively engaged with the University.

The data we hold on both groups may include;

- a. Biographical information (including name, titles, gender, date of birth)
- b. Contact details (including postal address, email address, phone numbers)
- c. Education details (Qualifications gained and Qualification year, also past modules and module years)
- d. Your relationships (Your relationships such as spouse/partner, university staff, and organisations)
- e. Your Employment details such as: employer name, job title, sector, employment location (City/country)
- f. Your interests and activities, for example board memberships or hobbies which are relevant to the work of The Open University, which may include extracts from any related media stories
- g. Communications sent to you by the University or received from you
- h. Donations to the University (including gift aid status and if donating by Direct Debit or standing order your bank details). We do not store credit or debit card details and we are fully PCI-DSS compliant
- i. Other philanthropic activity relevant to the work of The Open University
- j. Legacy details
- k. Volunteering on behalf of the University (for example mentoring)
- l. Events you have attended (including meetings with University staff)
- m. Your Preferences – to help us engage you in the ways most relevant to you.

We use a wide variety of sources either directly or via internet search engines, some on a subscription basis, to augment, update and validate the data we hold on alumni and non-alumni, as well as to help us identify individuals likely to have an interest in the organisation.

These include:

- Open profiles on social media sites such as LinkedIn and Twitter
- Reliable News and Press Reports
- Companies House and other business-related resources including company websites
- The Charity Commission and other websites relating to charitable trusts and foundations
- Subscription services such as Who's Who, Lexis Nexis and DDIQ

- Internet search engine results
- Property sites
- Public records of other charities or organisations you might be affiliated with
- Sunday Times Rich List and other rich lists
- The Queen's Honours Lists

We do not obtain or buy lists of people from other organisations and we do not share or sell your information to other organisations.

3. How we use your personal information

We use your data to communicate with you via post, email, SMS, phone and digital channels about The Open University. This includes invitations to events, news and updates from The Open University, fundraising materials and information about how you can continue to support your University.

The Development Office primarily uses your data to communicate alumni activities, to request support for our fundraising programmes and for the promotion of benefits and services.

These can include;

- Sending you our magazine or e-newsletters
- Inviting you to events
- Informing you of benefits available to alumni and supporters
- Asking you to support the University by giving your time, experience or financial support.

The data is also available to other relevant departments across the University.

We may use your details for the purposes of telephone fundraising. Our telephone fundraising campaigns are managed in-house, and we do not use external agencies. Our callers are current employees of The Open University and are paid for their work. If you would like to opt-out of receiving telephone fundraising calls, please email us at telethon@open.ac.uk.

Responding to enquiries

If you contact us with a question, comment, compliment or complaint then we will keep a record of this correspondence and any associated documents so that we have the information available in the event of a follow-up, dispute or investigation.

Notifying you of changes to policies

If we make significant changes to our policies which may affect you, we will use your contact details to inform you of the changes.

Requesting information if you are attending our events

If you participate in an event that we have organised, we may ask you to provide information to make sure we can manage the event safely and efficiently. We may also ask you for details of any accessibility need which you may have, so that we ensure our event is inclusive, in line with the provisions of the Equality Act 2010.

We may use your information to invite you to become involved with us in new ways, raise funds and grow our supporter base.

Sharing Alumni Relations and fundraising materials with you

Alumni and fundraising materials that we might share with you include information about our activities and their impact, our news, events and fundraising appeals, and other ways you can become involved with us.

Where you have provided your postal address or telephone number to The Open University we may send this information to you by post or by calling your telephone where appropriate. We will continue to share news and information messages such as the alumni newsletter with you via email. We may also send you direct marketing by email or SMS where appropriate.

Targeting our communications and researching our supporters

We have a duty to make sure that we're spending your donations wisely, and that means doing some research and analysis to inform our decisions. We want to send the most effective messages that we can in the most efficient way possible. In order to work out who to contact, what to say and when to get in touch, we carry out the following activities:

Analysing how emails are opened and read

We track emails we send to you to see which messages have the highest response rates and whether there are messages that resonate with particular groups of people. We do this by logging whether emails we send have been opened, deleted and interacted with (for

example, by clicking on links within the emails). Although we only use this information to look at general patterns, it is still personal information because it is linked to your email address

Segmentation

This is where we analyse information such as postcodes of supporters, and whether donations have been given regularly. This helps us to tailor appropriate communications to you, as well as improve your experience as an Open University supporter.

Undertaking research to understand who might choose to give higher donations

We undertake in-house research to help us identify people who may be able to support us with a larger gift; using information you have given us (if you're an alumnus) and publicly available records such as the electoral roll, land records, 'rich lists', Who's Who publications and Companies House records. We may also collect information on your interests, for example board memberships, hobbies, or articles about you in newspapers or magazines. We use this information to inform our approach and develop a clearer understanding of areas of affinity between the University and you. This helps us to tailor our communications, ensuring that we are contacting potential supporters to about meetings, events and fundraising opportunities which may be of interest to them.

Due diligence

We may also carry out due diligence on potential donations in line with the Development Office [ethics statement](#).

4. Processing your donation

When you make a donation or other payment to The Open University, we will use your payment and contact details, payment amount and date of payment, to process that payment and take any follow-up administrative action needed (for example, sending a receipt).

If you choose to include Gift Aid with a donation to us, then we will also ask for your address and UK taxpayer status as this information is required by law. This information is needed for us to fulfil our obligations under tax (sections 413 to 430 Income Tax Act 2007) and charity law. Information associated with Gift Aid declarations must be retained for 7 years. This information will be shared with HMRC for tax

regulation purposes and may also be shared with the Fundraising Regulator and the Charity Commission in the event of an enquiry or investigation.

5. When you support us via a third party

Your information may be shared with us by an independent organisation, for example fundraising sites like JustGiving. These independent third parties will only do so when you have indicated that you wish to support The Open University and with your consent. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

6. Our suppliers and service providers

We may disclose your information to our third party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf.

When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

Examples of activities we use third party service providers for:

- Printing marketing and fundraising materials that we send directly to you.
- We may use a third party to manage the sending of bulk emails on our behalf, where we would share your email address.
- We may use cloud based IT systems for our alumni database, so your data is stored on third party servers

7. Where we store your personal information

Generally, information you provide to us is held securely on the University's alumni and supporter database, or on our cloud based systems which are located within the EEA.

If at any time we transfer your personal information to, or store it in, countries located outside of the EEA we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law.

These steps include imposing contractual obligations on the recipient of your personal information, or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. For example, we would ensure that a US based supplier has signed up to "Privacy Shield". Please contact us using the details at the end of this policy for more information about the protections that we put in place.

8. How long we keep your personal information for

We believe that the relationship we have with our alumni, supporters and friends is a life-long one and so we retain your data until such time as you request its removal. We will always maintain a record on our database containing at least your biographical and education details for statistical purposes and to ensure we do not inadvertently contact you in the future.

More details on how long the University keeps information can be found on our website in our Alumni Retention Policy.

9. Our legal basis for contacting you and using your personal information

Generally, our legal basis for processing your personal data is that it is in The Open University's legitimate interests of maintaining a relationship with you, and promoting our vision, mission and values.

We will ask for your consent to contact you with certain kinds of communication.

10. Your (data subject) rights:

You have a number of rights in relation to your personal information under data protection law.

In order to exercise any of these rights, please contact us using the details in Section 11 of this document.

You have the right to:

- access the personal information that we hold about you
- correct inaccuracies in the personal information that we hold about you
- request that we stop sending you direct marketing communications
- withdraw your consent, where consent has been requested

In certain circumstances, you have the right to:

- have your details removed from systems that we use to process your personal data
- restrict the processing of your personal data in certain ways
- obtain a copy of your personal data in a structured electronic data file
- object to certain processing of your personal data by us

Complaining to the UK data protection regulator

You have the right to complain to the Information Commissioners Office (ICO) if you are concerned about the way we have processed your personal information. Please visit the ICO's website www.ico.org.uk for further details.

11. Contact us

All Alumni and Supporters may update their communication preferences and opt-out of receiving some or all communications from us at any time.

If you are an alumnus you can:

- 1) Update your preference via the Communication Preference Website by logging into the alumni portal at www.alumni.open.ac.uk
- 2) Email alumni@open.ac.uk
- 3) Write to us at The Open University Development Office, Walton Hall, Milton Keynes, MK7 6AA or call us on 01908 655044.

If you are not an alumnus or a supporter you can:

- 1) email giving@open.ac.uk
- 2) Write to us at The Open University Development Office, Walton Hall, Milton Keynes, MK7 6AA or call us on 01908 655044
- 3) Respond to any recent correspondence you have received from the Development Office

Please direct any queries about the way we process your personal information, or requests to exercise your rights as a data subject, to our Data Protection Officer using the contact details below.

- Email: data-protection@open.ac.uk
- Telephone: +44(0)1908 653994
- By post: The Data Protection Officer, PO Box 497, The Open University, Walton Hall, Milton Keynes MK7 6AT.

To view our fundraising charter, please visit giving.open.ac.uk/privacy

Alumni and Supporter Charter

This charter, available at giving.open.ac.uk/privacy outlines the commitment to supporters by The Open University. We have registered with the Fundraising Regulator, and as such we agree to ensure our fundraising is legal, open and honest and respectful. The standards for fundraising are set out in the Code of Fundraising Practice.



Registered with
**FUNDRAISING
REGULATOR**