

WCL Alumni Limited Privacy Policy

We are committed to safeguarding the privacy of our website users, customers, and suppliers.

This statement is designed to inform you how and why we may collect, store, and use information about you. It covers:

- the types of information we collect about you
- how we collect and use it
- who we might share it with
- the steps we'll take to make sure it stays private and secure
- your rights to your information.

More information

For more details about anything covered in this policy, please refer to the contact details at the end of this document.

Who we are

When we say 'we', we mean WCL Alumni Limited. We work in partnership with the College providing alumni services. For the purposes of the Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679 ("GDPR") the College and WCL Alumni Limited are joint 'data controllers' of alumni personal data. As 'joint-data controller' with the College we are jointly responsible for deciding how we use your information.

The registered company WCL Alumni Limited trades under the name 'Think Alumni'.

Amendments to the policy

We may update this policy from time to time by publishing a new version on our website. You should check this page occasionally to ensure you are happy with any changes to this policy. We may also notify you of changes to our privacy policy by email.

Sources of the information we may collect about you

We may collect information about you from a variety different places including:

- From you during the course of your relationship with the College (Registration), such as your gender, date of birth, postal address at College, email address, contact details, course completed;
- From you when you register or sign up on our website (Website Registration, Sign up), you may provide us with your name, email address, telephone number and a password;
- You may provide additional information to add to your profile (Profile Information) describing your skills, professional experiences, education, and interests. These additions are entirely up to you but providing additional information enables you to derive more benefit from the alumni network;
- From you when you contact us with an enquiry or in response to a newsletter or communication from us, in which case, this may tell us something about how you use our services;
- From you when you use this website, such as information about your computer and your visits to the website for example browser type and version, length of visit, page views; and
- From documents and information that are available to the public or a third party, such as the electoral register and social networks.

We'll only collect your information in line with relevant regulations and law and this may relate to any of our products or services you currently receive or wish to know more about.

Where we collect information directly from you, you're responsible for making sure you give us accurate and up to date information.

Types of information we may hold about you and how we may use it

The information we may collect and use about you falls into a number of categories and may be used for a number of different purposes.

Our website analytics and communications tracking system may process data about your use of our website and services and the engagement you have with our communications ("**usage data**"), so we can analyse the use of our website and communications to improve the services we provide. This usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views, page-opening data, click-through data and website navigation paths, as well as information about the timing, frequency and pattern of your visits.

We may process your profile data ("**profile data**"). The profile data will include your name, gender, date of birth, postal address whilst at college, and email address and may include your telephone number, interests, volunteering wishes, educational details and employment details. The sources of the profile data are you and the College. The profile data may be processed for the purposes of operating our website, providing our communication services, ensuring the security of our website and services, and maintaining back-ups of our databases. The legal basis for this processing is our joint Legitimate Interests with the College and the proper administration of our website and business. We have determined our Legitimate Interests basis for processing your profile data in conjunction with the College using the ICO Guidance for Legitimate Interest Assessment. We retain a copy of the Assessment which is available to you if you contact us at the details shown at the end of this document.

We may process information that you provide to us for publication on our website, such as testimonial appraisals, or through our services ("**publication data**") for the legitimate purposes of publicising the College, the alumni service and its products and services.

We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters and/or college benefit schemes including benefits and services and notification of events ("**notification data**"). The data may be processed for the legitimate purpose of sending you relevant notifications and/or newsletters. The legal basis for this processing may be either your consent to do so or to enable the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

We may process information that you provide to us for the purpose of conducting polls or surveys ("**survey data**"). You may be invited to participate in a poll or survey. Your selection may be random or it may be based on non-personally identifiable information such as your College course or the year you attended the College. Whether or not you decide to participate is completely up to you. The data may be processed for the legitimate purpose of enabling the College to enhance its educational offer to future students. The legal basis for this processing is our joint Legitimate Interests with the College or your consent to do so or to enable the performance of a contract between you and us.

We may process information contained in, or relating to, any communication that you send to us ("**correspondence data**") whether or not made through our website. This may include the communication content and other data associated with the communication. Our website may generate data associated with communications made using the website contact forms. The data may be processed for the legitimate purposes of communicating with you and record-keeping. The legal basis for this processing is our Legitimate Interests, namely the proper administration of our website and business and communications with users.

We may process any of information about you identified in this policy where we're required to do so to enable us to establish, exercise or defend a legal claim. The legal basis for this processing is our Legitimate Interests, namely the protection and assertion of our, your and others' legal rights.

We may process any of the information about you identified in this policy where we need it to obtain or maintain our insurance coverage, manage our business risks, or obtain professional advice. The legal basis for this processing is our Legitimate Interests, namely the proper protection of our business against risks.

In addition to the specific purposes set out above, we may also process information about you where we need to do so to comply with our legal obligations, or to protect your vital interests or the vital interests of another person.

You should not supply us with information about another person unless we prompt you to do so. If you do supply information about others to us without a request from us to do, you are responsible for telling them how to find this Privacy Policy and making sure they have agreed to us using their information for the purposes set out in it.

When we may provide information about you to others

We will not, without your express consent, provide your personal information to any third party except in accordance with this Privacy Policy.

We may disclose information about you to our insurers and/or professional advisers if it's needed for us to obtain or maintain insurance coverage; manage risks to our business; obtain professional advice; or establish, exercise or defend a legal claim.

In addition we may also be required to disclose information about you to comply with a legal obligation, or in order to protect your interests or the interests of another person. We may also need to disclose information about you if it's necessary to enable us to establish, exercise or defend a legal claim.

International transfers of information about you

There are no circumstances in which information about you may be transferred to any country outside the European Economic Area (EEA).

The hosting facilities for our website are situated in the United Kingdom.

Retaining and deleting your information

We'll only keep the data we hold about you for as long as it's needed for the purposes for which we collected it. In most cases this will be a minimum period of three years.

In some cases it's not always possible for us to say in advance how long we'll need to keep your information. In such cases, we'll use the following criteria to help us decide how long to keep it:

(a) the period of retention of personal data (name, date of birth, postal address, email address, and telephone numbers) will be determined based on the length of the service agreement between WCL Alumni Limited and the College, and will, in no event, exceed 12 months beyond the expiry of any such service agreement.

In some circumstances we may need to keep your data for a longer period, for example where it's needed to help us comply with our legal obligations.

Your rights

You have a number of rights relating to your information, for example to see what we hold, to ask us to share it with another party, ask us to update incorrect or incomplete details, to object to or restrict processing of it, to make a complaint etc. This section sets out a summary of these rights and how you may go about exercising them. Some of the rights are complex, and not all of the details have been included in our summaries so you may wish to read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your main rights are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

You have the **right to access**; to confirmation as to whether or not we process information about you and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of information about you. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. You can request access to the personal data we hold about you by

contacting data_administration@thinkalumni.com

You have the **right to rectification**; to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the **right to the erasure** of information about you without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

In some circumstances you have the **right to restrict the processing** of information about you. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store information about you. However, we will only process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the **right to object to our processing** of information about you on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of information about you for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process information about you for this purpose.

You have the right to object to our processing of information about you for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

To the extent that the legal basis for our processing of information about you is your consent to do so; or that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract; AND such processing is carried out by automated means, you have the right to receive information about you from us in a structured, commonly used and machine-readable format; the **right to data portability**. However, this right does not apply where it would adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data protection laws, you have a legal **right to lodge a complaint** with a supervisory authority responsible for data protection. In the UK this is the Information Commissioner's Office (www.ico.org.uk).

To the extent that the legal basis for our processing of your personal information is consent, you have the **right to withdraw that consent** at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

You may exercise any of your rights in relation to information about you by written notice to us in the form of an email to data_administration@think-it.org.uk

Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that's sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies themselves don't typically contain any information that personally identifies a user, but personal information we store about you may be linked to the information stored in and obtained from cookies.

Our use of Cookies

We use cookies:

- (a) to identify you when you visit and as you navigate through our website;
- (b) to help us to determine if you're logged into our website;
- (c) to store information about your preferences so we can personalise and tailor your journey through our website;
- (d) to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (f) to help us analyse the use and performance of our website and services; and
- (g) to store your preferences in relation to the use of cookies more generally.

Cookies used by our service providers

A number of our service providers may use cookies and those cookies may be stored on your computer when you visit our website.

From time to time we may use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

Managing cookies

Most web browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version but you can obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

While you're completely free to block the storage and use of cookies on your computer you should be aware that doing so may mean that your experience of using our website may be slower or less effective, and you may not be able to access or use all of the website's features. Ultimately this may negatively impact our ability to provide you with information or services.

Security of your personal information

We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. We will store all the personal information you provide on our secure (password and firewall protected) servers. All electronic transactions you make to or receive from us will be encrypted using SSL technology.

Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping your password and user details confidential. We will not ask you for your password (except when you log in to the website).

Third party websites

Our website may contain links to other websites. We are not responsible for the privacy policies or practices of third party websites.

About WCL Alumni Limited

This website is owned and operated by WCL Alumni Limited, trading under the name of Think Alumni. We are registered in England and Wales under registration number 8049840, and our registered office is at Kemp House, 152 City Road, London EC1V 2NX.

You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website from time to time; or
- (d) by email, using info@wclalumni.com, the email address published on our website from time to time.

Our Data Protection Officer's contact details are: data_administration@thinkalumni.com