



# Alumni Privacy Notice

## Introduction

Throughout this privacy notice, "University" "we", "our" and "us" refers to the Norwich University of the Arts. "You" and "your" refers to our alumni.

Norwich University of the Arts is a registered data controller. We collect, hold and process personal information relating to our alumni. It is essential to do so in order for us to carry out our legal responsibilities, functions and manage our operations. We hold personal information and comply with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA).

You may also want to read other Norwich University of the Arts privacy notices. If you use our website, please read the website privacy notice. We do our utmost to protect your privacy. As such we have security systems and procedures to protect information from unauthorised disclosure, misuse, or destruction.

## What types of information we hold about you

Your personal information held and processed by us may include, but is not limited to:

- Your name, stated gender, nationality, and date of birth
- Your education history including graduation dates and course information
- Honorary degree information
- Your contact details
- Your communication preferences
- Records of University events you register for and attend
- Records of communications and interactions we have had with you
- Alumni memberships (e.g., library membership)
- Your career information including your employer, location and job title

To assist with our research, for statistical purposes, and also to improve our services, we may retain a record of your ethnicity, where this is known. However, this data will be anonymised and not held as part of your record and, as such, is not considered to be personal data.

## How and why we collect this information

Through our communications, events, and activities we aim to build strong and meaningful lifelong relationships with our global community. We carry out research to better understand our alumni relationship. We conduct surveys for research, statutory audit, and industry benchmarking purposes.

Some of your personal data is transferred from your student record to the University's alumni database when you graduate. We occasionally supplement the data we hold about you with information from publicly available sources. For example, Companies House, LinkedIn and other similar websites.

The University complies with the provisions of the Data Protection Act 2018 which sits alongside the UK General Data Protection Regulation (GDPR). Article 6 of the UK GDPR defines six different lawful grounds for an organisation to be permitted to process personal data, and the University is legally obliged to determine and advise you of under which of the legal bases the different categories of your personal data is processed. The grounds we use to process your personal data are as follows:

The first legal basis we would rely on is Article 6(1)(e), '*for the performance of a public task in the public interest*'. This applies to where we use your personal data to meet our obligations or duties, or to exercise our powers, as a public authority, or to support the functions of other authorities that have a public task defined within law. Examples of this would include our obligation to share data with the Higher Education Statistics Agency (HESA) which is now part of Jisc (as detailed below), where we are statutorily required to provide your contact details to government bodies or agencies acting on behalf of such bodies to conduct a survey of university graduates, Ofsted, professional bodies, auditors, assessors, or other external regulators. We may also use your data for the purposes of conducting surveys for research, statutory, audit and industry benchmarking purposes. Where possible, the University would first anonymise the data.

The University would rely on Article 6(1)(f), '*legitimate interests*' as its legal basis where we judge the use of the personal data to be within our legitimate interests (or the legitimate interests of another party) and where we do not deem this to be privacy-intrusive or a risk to your own rights and freedoms. This is where the use of data poses no risks to individuals and is for the purposes of improving our services or investigating technical issues.

We rely on Article 6(1)(a), '*consent*' as our legal basis when you have given us your freely given, informed, specific consent. An example may be where you have given us consent to advise you of relevant products or services related to the University and newsletters after you have completed your studies. We also rely on consent to process your data where you have contacted us in order to request a service, such as attending an event of the University or requesting further information. It is important to note that you have the right to withdraw that consent at any time.

Where we hold details of your nationality, this will be classed as 'sensitive personal data' also known as 'special category personal data.' Access to and the sharing of this kind of 'special category' personal information is strictly controlled. The University's legal basis for processing this sensitive data under Article 6 of the UK GDPR is Article 6(1)(a), '*consent*.' In addition, for sensitive data, the University is required to identify an appropriate lawful condition under Article 9 of the UK GDPR which in this case is Article 9(2)(a) '*explicit consent*'. As above, it is important to note that you have the right to withdraw that consent at any time.

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

## How we use your information

Your personal information is used by the University to support a full range of activities for academic and business purposes, including the following:

- Informing you of other products, services or events related to the University, such as alumni and fundraising events, reunions or networks.
- Facilitating industry and employer engagement, with your consent.
- Updating you on university news, for example via the alumni e-newsletter and occasional postal mailings, including, where relevant, information on fundraising campaigns, activities and appeals.
- To provide statistics to faculties and departments within the University on alumni destinations, employment statistics and geographical location which informs marketing information for student recruitment purposes and to inform service offering of careers support.
- For general administrative purposes, e.g., to administer an event you have registered for or attended.
- To conduct surveys for research, statutory, audit and industry benchmarking purposes.

The Government undertakes a survey every year of recent graduates and their employment. This data is used to inform league tables for universities, and to help inform Governmental priorities for higher education funding. We have a statutory responsibility to provide your basic contact details for this survey. Even if you opt out of receiving alumni communications, you will be contacted for the Graduate Outcomes Survey.

## Who we might share your information with

Your information will be used primarily by the University's Alumni Team and Marketing Team. Where appropriate and permitted, they may share data on a confidential basis with other University departments.

We may disclose certain personal information to external organisations to carry out our legal responsibilities, functions and manage our operations or because you asked us to. These may include, but are not limited to:

- Government bodies, or an agency acting on behalf of such bodies, to conduct a survey of university graduates, which is a statutory obligation.
- Higher Education Statistics Agency (HESA) which is now part of Jisc. It is important to note that, with effect from 4 October 2022, any personal data processed by HESA as controller has been transferred to Jisc, who is now the data controller of this personal information. This means that Jisc determines the manner and purpose of its use. You can find further details by reading their updated Privacy Notice [here](#).
- Hosts for specific events (for example brief biographies).
- Third parties engaged by the University as approved data processors to provide alumni relations and fundraising related services, such as mailing houses facilitating the delivery of large-scale alumni relations.
- Third party software systems required to facilitate alumni data functions (for example Donor and Azorus). These organisations may be based outside of the UK. These organisations have safeguards in place, which meet appropriate standards, to protect your personal data.

## How long we keep your information

We will keep your personal information only as long as is necessary to fulfil the purpose for which it was collected and in accordance with the University's records retention schedule.

This means that, in normal circumstances, your full student record is held for six years after you have left the University, in line with the University's Data Protection Policy. After this time, we will retain a core record of your data indefinitely, as detailed in the first part of this Privacy Notice, in support of your lifelong relationship with us or until you request us to do otherwise. We periodically review the data held on our database to ensure that it is accurate and relevant to our aims. Where we find records which are out of date, inaccurate or no longer relevant, we will remove this data.

## Your rights

You can manage the emails you receive from us by clicking on the preferences link at the end of any email you have received from us. You can use the same process if you wish to unsubscribe from receiving any further marketing or event information from us. Communications may be sent to you by post, telephone or electronic means (principally by email) depending on the contact details we hold, and the preferences expressed by you about the types of communications you wish to receive. To let us know how you would prefer to keep in touch with us or to request no further communications from us, contact the Alumni team on [alumni@norwichuni.ac.uk](mailto:alumni@norwichuni.ac.uk).

Additionally, under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information (this is known as a Subject Access Request or SAR).
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. We do our best to ensure that our records are kept up to date and will regularly ask you, through our mailings, to let us know of any changes to the information we hold. We may consult alternative sources in order to undertake these checks, for example reviewing job information that you have made publicly available via LinkedIn and other social media, newspaper articles, company websites. If you wish to correct any data we hold, please contact the Alumni team [alumni@norwichuni.ac.uk](mailto:alumni@norwichuni.ac.uk) in the first instance.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances. Where you exercise your right to erasure, we may need to retain a core set of personal data to permit us to fulfil our public task and statutory duties.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact our Data Protection Officer at [dataprotection@norwichuni.ac.uk](mailto:dataprotection@norwichuni.ac.uk) if you wish to make a request or have any queries.

If you believe your data has been breached, please speak to the University. The [Information Commissioners website](#) provides more information on data breach rights.

## How to contact us

If you require further information or have any concerns about how your personal information is held and processed by us, please email the University's Data Protection Officer at [dataprotection@norwichuni.ac.uk](mailto:dataprotection@norwichuni.ac.uk) or write to us at Data Protection Officer, Norwich University of the Arts, Francis House, 3 -7 Redwell St, Norwich NR2 4SN.

You can also complain to the ICO if you are unhappy with how we have used your data.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

ICO Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

## Changes to this privacy notice

We keep our privacy notices under regular review.

This privacy notice was last updated on 17 August 2023.