



Trinity College Dublin
Coláiste na Tríonóide, Baile Átha Cliath
The University of Dublin

Data Protection Statement

Trinity Development & Alumni

1. PROTECTION STATEMENT FOR ALUMNI AND SUPPORTERS

1.1 Introduction

This data protection statement explains how Trinity Development and Alumni (TDA, we or us) handles and uses the personal data it collects about Trinity College Dublin's (The University) alumni, students and past, current and future supporters, whether donors, volunteers or participants in membership groups. When collecting this data, TDA acts as a data controller and will therefore provide below, in line with the General Data Protection Regulation (GDPR), appropriate information on how we collect personal data about you, who we disclose this information to, and the purpose for which this information is used and how you can interact with us.

1.2 Scope

We are committed to protecting your personal data and being transparent about what information we hold and how we use it. In light of the GDPR, we have updated this data protection statement to set out the steps we take to help ensure your privacy is upheld. As a legal basis for compliance under the GDPR, we rely on Legitimate Interest to process personal data about you. This basis has been identified as the rightful legal basis for TDA's processing activities, after carrying out a Legitimate Interest Assessment, whose outcome concluded that our legitimate interests in processing your personal data do not unduly affect your interests or fundamental rights and freedoms. Examples of our legitimate interests are: (i) to benefit from cost-effective services (e.g. we may opt to use certain IT platforms offered by our service providers); (ii) to effectively develop and maintain relationships with University alumni and supporters; (iii) to safeguard the security of our IT systems; and (iv) to screen donations to the University and prevent unlawful or inappropriate donations.

To the extent that we process any special categories of personal data relating to you for the purposes outlined below, we will do so because: (a) you have given us your explicit consent to process such data; (b) the processing is necessary for reasons of substantial public interest on the basis of applicable law (e.g. where we are required by law or regulatory requirements to process your personal data); (c) the processing is necessary for the establishment, exercise or defence of legal claims; or (d) you have made the information manifestly public.

This data protection statement sets out how TDA uses personal data for alumni and supporter relations and fundraising purposes.

2. WHO WE ARE

2.1 Trinity Development and Alumni

TDA, administered from the offices of Trinity Foundation, is responsible for supporting the University's ambitious educational, research and outreach programmes and maintaining a connection between the University and its alumni, supporters and friends. Our Head Office is located in East Chapel on Trinity College campus in Dublin 2. TDA can be contacted by post at the above address, by email at alumni@tcd.ie or by phone on +353 1 896 2088.

2.2 Information & Compliance Officer

TDA has appointed an Information & Compliance Officer to ensure compliance with all aspects of the GDPR. TDA's Information & Compliance Officer oversees how the organisation collects, uses, shares and protects your personal data in accordance with applicable law. The Information & Compliance Officer can be contacted at alumniprivacy@tcd.ie.

3. PERSONAL DATA HELD BY TDA

The majority of personal data held by TDA is directly provided by alumni and non-alumni (e.g. supporters of the University). If you are a student or studied at the University, some of your personal data is transferred from your student record to our alumni database, provided you did not opt-out of this process upon registration with the University. We may also obtain your personal data because other people that are affiliated to the University provide it to us (e.g. University clubs, societies or alumni groups), or because it is disclosed on publically available sources such as company or charity registers or business and employment oriented social networking services and job boards. We may also obtain your personal data from service providers that are permitted to share your data with us.

Personal data that we collect or obtain typically includes:

- details of education and employment (e.g. name of the organisation you work for, your job title, name of your degree);
- identifiers (e.g. age, date of birth, gender, country of residence) and unique personal identifiers (e.g. pictures);
- contact details (e.g. e-mail addresses, telephone numbers, home address);
- financial information relating to you (e.g. details of past donations to the University, details of your means)
- details of interactions with the University and TDA including:
- membership of, and any role in, University clubs, societies, and alumni groups;
- attendance and participation at College or TDA events
- relationships with other alumni, students or supporters of the University;
- communication preferences provided by you, to help us provide tailored and relevant communications;
- other personal data that you may provide to us.

We also record, where applicable, based on information provided by [o] and, in some cases, based on publicly available information, other information such as:

- history of donations made to TCD and TDA;
- ability and willingness to make donations;
- philanthropy and in-kind giving;
- career highlights and other life achievements.

4. HOW LONG WE KEEP YOUR INFORMATION

We hold your information for no longer than is necessary to fulfil the purpose for which it was collected or to comply with legal and regulatory requirements. In general, although there may be some limited exceptions, your personal data is deleted by us within one month following an indication from you that you do not want to be recorded in our database.

5. HOW WE USE YOUR DATA

Your data is used for a number of purposes in support of alumni relations, supporter communications and fundraising.

These include:

- sending you publications;
- conducting surveys;
- providing you with details of services, including access to TCD facilities and alumni email accounts;
- sending you tailored proposals, appeals and requests for donations;
- sending you details of volunteering opportunities;
- inviting you to alumni and other University or associated events. i.e. clubs and societies events;
- research in order to improve our understanding of our alumni and supporters, inform our fundraising strategy and target our communications more effectively;
- internal record keeping, including the management of any feedback or complaints;
- where relevant, make available personal data to the University;
- the management and administration of TDA such as financial accounting, operational management, IT management, satisfying legal and regulatory obligations (including the completion of due diligence and money laundering checks before accepting certain donations) and other administrative purposes.

From time to time, we will share your data with Third Parties engaged by TDA to provide services to facilitate the following:

- Send email communications about our services, including events and relevant alumni activity;
- To help us conduct Phone Campaigns to engage with alumni; • For mailing out our Trinity Today magazine;
- To conduct fundraising appeals.

We have a contract with each Third Party that protects your rights to privacy. Before seeking or accepting major donations we are required to conduct due diligence, including reviewing publicly available personal data relating to the donor's criminal convictions and offences.

Communications to you may be sent by post, telephone or electronic means (principally email), depending on the contact details we hold and the preferences expressed by you about the types of communications you wish to receive. Where we are legally required to obtain your consent to provide you with certain marketing communications, we will only provide you with such communications where we have obtained such consent from you.

If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us using the details listed below.

In some cases, we also link personal data together to create profiles that help us:

- identify your potential for, and interest in, supporting the University;
- send communications to you which are relevant and timely;
- identify volunteering opportunities or opportunities for providing support that might be of interest to you
- avoid approaching you with opportunities which are unlikely to be of interest to you.

The activities above enable us to make decisions which help to raise more funds, sooner, and more cost-effectively, in support of the University's strategic research and teaching objectives. We always seek to ensure that any opportunities we present are aligned with your interests, based on the research we lawfully conduct into your interests and means based on information you provide to us and information that we lawfully obtain from other sources (as described in Section 3 above). If you do not wish TDA to undertake this activity, please email alumniprivacy@tcd.ie.

6. WHO WE DISCLOSE YOUR DATA TO

In connection with one or more of the purposes outlined in the “**How we use your data**” section above, TDA generally discloses information about you to: the University; professional advisors and third parties that provide services to us (e.g. IT systems providers, accountants, marketing agencies); and competent authorities (e.g. regulators).

Some of the recipients of your personal data referenced above may be based in countries outside of the European Economic Area whose laws may not provide the same level of data protection. These countries typically include: the United States of America. In such cases, TDA will ensure that there are adequate safeguards in place to protect your personal data that comply with TDA's legal obligations. To ensure this level of protection, TDA typically uses a data transfer agreement with the recipient based on standard contractual clauses approved by the European Commission. A copy of these clauses is available here: https://ec.europa.eu/info/law/lawtopic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-thirdcountries_en.

7. HOW WE PROTECT YOUR DATA

We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them

TDA uses a range of physical, electronic and managerial measures to ensure that we keep your personal data secure, accurate and up-to-date. These measures include:

- education and training to relevant staff to ensure that they are aware of TDA's privacy obligations when handling personal data;
- administrative and technical controls to appropriately restrict access to personal data;
 - technological security measures, including firewalls and anti-virus software;
 - and • physical security measures that limit access to our services to TDA staff only.
- Although we use appropriate security measures once we have received your personal data, the electronic transmission of data is never completely secure. We endeavour to protect personal data but we cannot guarantee the security of personal data transmitted to us or by us.

8. YOUR RIGHTS

Under the GDPR, you have various rights relating to your personal data. In particular, you have a right to:

- be informed as to whether or not TDA is processing your personal data and obtain certain information about any such processing;
- access a copy of personal data TDA holds about you;
- ask that we rectify personal data we hold about you that you think is inaccurate or incomplete;
- ask that we erase personal data that we hold about you or restrict the way in which we use such personal data;
- object to processing of your personal data;
- withdraw your consent to the processing of your personal data (to the extent that such processing is based on consent).

To exercise any of your rights, or if you have any other questions about our use of your personal data, please contact a staff member of TDA, primarily through alumniprivacy@tcd.ie or 01 8962088. When exercising your right, you may choose to complete TDA's Data Subject Access Form (which is available here: [Data Subject Access Form](#)). Completing this form will assist TDA in effectively handling your request within the timeframes required by law but you are not required to complete this form.

If you have a complaint or query about the use of your personal data by TDA, please contact us at alumniprivacy@tcd.ie and we will take the appropriate actions to address your concern. You also have a right to complain to the data protection regulator in the place where you live or work, or in the place where you think an issue in relation to your personal data has arisen.

9. CHANGES TO THIS PRIVACY NOTICE

We may modify or amend this privacy notice from time to time.

Any future changes or additions to the processing of your personal data as described in this notice affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.