Introduction

Welcome to The University of Plymouth's Giving Day privacy policy.

We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how The University of Plymouth collects and processes your personal data through your use of this website, including any data you may provide through it.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with the <u>University of Plymouth Alumni Privacy Notice</u> and any other privacy policies we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

The University of Plymouth is the controller and responsible for this website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity: University of Plymouth

Email address: dpo@plymouth.ac.uk

Postal address: Drakes Circus Plymouth PL4 8AA

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review.

1

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data including first name, last name, previous names, year of graduation
- Contact Data including e-mail address and home address
- Financial Data including payment card data
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not generally collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). However, we may do so in order to facilitate any reasonable adjustments to enable attendance at our events. We do not collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into

with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Collaborate with us or our engage with our services or support;
 - subscribe to our service or publications;
 - request marketing to be sent to you; or
 - give us feedback or contact us.
- Automated technologies or interactions. As you interact with our website, we will automatically collect
 Technical Data about your equipment, browsing actions and patterns. We collect this personal data by
 using cookies, server logs and other similar technologies. We may also receive Technical Data about you
 if you visit other websites employing our cookies.
- Third parties or publicly available sources. The Universities will share personal data between them and may also receive personal data about you from various third parties and public sources as set out below

Technical Data from the following parties:

- (a) analytics providers such as Google based outside the UK;
- (b) advertising networks; and
- (c) search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services
- Identity and Contact Data from data brokers or aggregators
- Identity and Contact Data from publicly available sources

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message or if we should require information of any special requirements in order to facilitate your attendance at an event. You have the right to withdraw consent at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new contact	(a) Identity	Performance of a contract with you
	(b) Contact	
To engage with you and provide support	(a) Identity	(a) Performance of a contract with you
	(b) Contact	(b) Necessary for our legitimate interests
	(c) Financial	
	(d) Transaction	
	(e) Marketing and Communications	
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity	(a) Performance of a contract with you
	(b) Contact	(b) Necessary to comply with a legal
	(c) Profile	obligation
	(d) Marketing and	(c) Necessary for our legitimate interests
	Communications	
To enable you to complete a survey	(a) Identity	(a) Performance of a contract with you
	(b) Contact	(b) Necessary for our legitimate interests
	(c) Profile	
	(d) Usage	
	(e) Marketing and Communications	
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity	(a) Necessary for our legitimate interests
	(b) Contact	(b) Necessary to comply with a legal obligation
	(c) Technical	

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity(b) Contact(c) Profile(d) Usage(e) Marketing and Communications(f) Technical	Necessary for our legitimate interests
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests
To make suggestions and recommendations to you about goods or services that may be of interest to you	 (a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications 	Necessary for our legitimate interests
To organise and enable your attendance at events	(a) Identity(b) Contact(c) Disability	(a) Performance of a contract(b) Necessary to comply with a legal obligation(c) Consent

5. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

What is a Cookie?

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- Analytical or performance cookies. These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. [We may also share this information with third parties for this purpose.]

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Title	Purpose
Cookie Name	
Google Analytics	We collect this information in a way which does not identify anyone, we do not make any attempt to find out the identities of those visiting any of our websites, and we do not share this information with anyone. This cookie enables us to:
	(a) Estimate our audience size and usage pattern.
	(b) Store information about your preferences, and so allow us to customise our site and to provide you with offers that are targeted to your individual interests.
	(c) Speed up your searches.
	(d) Recognise you when you return to our site.
	(e) Allow you to use our site in a way that makes your browsing experience more convenient, for example, by allowing you to store items in an electronic shopping basket between visits. If you

	register with us or complete our online forms, we will use cookies to remember your details during your current visit, and any future visits provided the cookie was not deleted in the interim.
Essential Cookies	Essential session cookies to enable certain parts of the website to function properly.

You can choose which analytical, functionality and targeting cookies we can set by clicking on the button(s):

Strictly essential cookies **OFF**

Analytical or performance cookies **OFF**

Functionality cookies **OFF**

Targeting cookies **OFF**

However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

6. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We do not share your data outside of the University of Plymouth.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

7. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8. Disclosures of your personal data

The University of Plymouth will not share your personal data with any third parties

9. International transfers

We do not transfer your personal data outside the European Economic Area

10. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

11. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

12. Your legal rights

As a data subject you have a number of rights in relation to your personal data. You can:

- access and obtain a copy of your data on request
- require the University to amend incorrect or incomplete data
- require the University to stop processing your data, for example where the data is no longer necessary for the purposes of processing
- object to the processing of your data where the University is relying on its legitimate interests as the legal ground for processing
- require us to erase your personal data

- require us to restrict our data processing activities (and, where our processing is based on your consent, you
 may withdraw that consent, without affecting the lawfulness of our processing based on consent before its
 withdrawal)
- receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller.

Please note that the above rights are not absolute, and the University may be entitled to refuse requests where exceptions apply.

For further information or if you wish to exercise any of these rights or if you have a complaint about the way you believe your data is being processed, in the first instance, please see <u>Your information rights</u> or email: <u>dpo@plymouth.ac.uk</u>.

If you have a complaint and you remain dissatisfied with how your complaint has been dealt with you can take your complaint to the Information Commissioner's Office (ICO) for a review. They can be contacted at casework@ico.org.uk.

13. Changes to this notice

This privacy notice is reviewed annually or when required to ensure compliance with data protection legislation. If significant changes are made to this notice and the way we treat your personal information we will make this clear and may seek to communicate this directly to you