

# **CURUFC – Data Protection Statement**

This statement explains how CURUFC (“we” and “our”) handles and uses the personal data we collect about our alumni and our past, current and future supporters, whether donors, volunteers or participants in membership groups that we run (“you” and “your”). CURUFC trades as Cambridge University Rugby Union Football Club as an Incorporated Company with Charitable Status. Company No. 09658537, VAT No. 214470100.

Developing a better understanding of our alumni and supporters allows us to keep in touch with you, in order to keep you apprised of our activities and developments, to provide services to you, and to identify ways in which you can support us, through donations or other forms of financial and non-financial support.

We are committed to protecting your personal information and being transparent about what information we hold. CURUFC has a data protection policy and procedures, an overview of which can be found here: <http://redlion150.curufc.com/data-protection-policy/>. The following statement sets out how CURUFC specifically uses your personal data for fundraising and alumni relations purposes.

## **Personal data held by CURUFC**

We may hold information relating to you from a number of sources. A significant proportion of the information we hold on alumni is that which you provide to us (for example, you may give us information by filling in forms on the CURUFC/University's websites, or by corresponding with us by telephone, email or otherwise). If you are a student or studied at Cambridge, some of your personal data is transferred from your CURUFC student record to the CURUFC alumni database.

Most records contain:

- details of your education (e.g. your College(s), dates of study)
- unique personal identifiers and biographical information (e.g. date of birth)
- your contact details (and we update these whenever you let us know that they have changed)
- details of your interactions with CURUFC, the University and Colleges, including:
  - your membership of teams, clubs, societies, and alumni groups
  - your attendance at CURUFC, Varsity and University related events
  - other contact with us or our partners (as listed below)
  - your relationships with other alumni or supporters of CURUFC, the University and Colleges
- details about your family (e.g. your marital status, the name of your partner or spouse)
- personal data provided by you for specific purposes (e.g. disability and dietary preferences for event management purposes)
- your communication preferences, to help us provide tailored and relevant communications

We also record, where applicable, based on information which you provide to us and, in some cases, publicly available information and information from our partners (as listed below):

- financial information relating to you and your family, including:
  - your history of donations made to CURUFC (the University and Colleges where known)
  - your ability and willingness to make donations, including our assessment of your income and whether particular donations or funding appeals may be of interest to you
  - your philanthropy and other giving, including donations to other organisations and other support that you provide (e.g. details of volunteering roles)
- your career highlights and other life achievements
- information about your areas of interest and extra-curricular activities

We augment the data we hold from CURUFC, the University and the Colleges with data from our partners (as listed below) and publicly available data.

We use targeted internet searches and may search the following websites (either directly or using search engines), where relevant in order to obtain and maintain the accuracy of the data listed above:

- Public sources for companies (in order to find personal data of those companies' employees, etc.):
  - Companies House and other business-related resources (free and subscription) for UK companies
  - US Securities and Exchange Commission for US companies
  - Capital IQ (subscription) for international companies
  - Company websites
- Public sources for charities (in order to find personal data of those charities' employees, trustees, etc., and to find information about donations and support):
  - Charity Commission and other internet sources for UK non-profits
  - GuideStar US for US non-profits
- Public sources for individuals:
  - Who's Who and Debrett's People of Today (subscription)
  - Sunday Times Rich List
  - Other rich lists, including Forbes Magazine's international rich lists
  - Property websites
  - The Queen's Honours Lists
  - National change of address services
  - LinkedIn, to check business details
- Press sources:
  - Factiva (subscription) for international press
  - Lexis Diligence (subscription) for negative press for due diligence purposes

## **How your data is used by CURUFC**

Your data is used by us for a number of interdependent purposes in support of alumni relations, supporter communications and fundraising. These include:

- sending you publications (e.g. alumni magazines/electronic newsletters and updates about the Club)

- conducting surveys, including research on when and whether particular donations or funding appeals may be of interest to you
- providing services, including access to CURUFC facilities and alumni email accounts (with prior permission for the latter)
- sending you tailored proposals, appeals and requests for donations
- sending you details of volunteering opportunities
- inviting you to alumni and other CURUFC/University events
- the promotion of other opportunities and services available to you (e.g. offers and opportunities available through the CURUFC & University's network of alumni groups)
- wealth analysis and 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
- administrative purposes (e.g. in order to process a donation you have made or to administer an event you have registered for or attended)

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 by email), depending on the contact details we hold and the preferences expressed by you about the types of communications you wish to receive.

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.

We may use automated or manual analyses to link data together to help us identify your potential for supporting CURUFC, to provide you with an improved experience, to send you communications which are relevant and timely, to identify volunteering opportunities or opportunities for providing support which may be of interest to you, and to avoid approaching you with opportunities which are not of interest. All of this enables us to raise more funds, sooner, and more cost-effectively, in support of CURUFC's strategic objectives. We always seek to ensure that any opportunities we present are aligned with your interests, based on the research we conduct.

We will always respect a request by you to stop processing your personal data, and in addition your statutory rights are set out below.

## **When CURUFC shares your data with others (our partners)**

We share the above categories of data with the University and sometimes the Colleges. We work closely with the University to provide our shared alumni and supporters with a coordinated approach. Any transmission of data to or from the University and/or the Colleges is managed through agreed processes which comply with relevant data protection legislation. The University and all of the Colleges have their own data protection statement and procedures.

We share the above categories of data with Cambridge in America (CAM), which advances the mission of the University of Cambridge, its clubs & societies and its thirty-one member Colleges by providing expertise in fundraising and alumni relations and by growing the base of support for Collegiate Cambridge among alumni and friends in North America. Data sharing with CAM is managed through agreed processes which comply with relevant data protection legislation.

Additionally, we share data on a considered and confidential basis, where appropriate, with:

- affiliated organisations and individuals which support and provide services to alumni and supporters, such as:
  - Cambridge University Development & Alumni Relations, Varsity Match Ltd, the Colleges, Hawks/Ospreys Clubs
  - volunteer partners closely related to us (e.g. Captains, Honorary Secretaries, CURUFC networkers, development and advisory board members, the CURUFC Executive Committee & Board and the CURUFC Management & Administration team
  - educational trusts and donors associated with the Club who awarded you a scholarship/bursary
- third parties engaged by CURUFC to provide fundraising related services, such as:
  - third party agencies who provide us with data about alumni and supporters
  - consultants advising us on individuals' capacity to donate
  - other contractors providing services to you on our behalf or services to us
- selected companies who provide CURUFC-branded or CURUFC-endorsed products and services

## **How we protect your data**

We ensure we have appropriate data sharing agreements in place before sharing your personal 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.

We also facilitate communication between individual alumni, but in doing so we do not release personal contact details without prior permission.

Any transfers of your data overseas (outside of the European Economic Area), for example to an international alumni organisation, as set out above, are protected either by an 'adequacy decision' by the European Commission (declaring the recipient country as a 'safe' territory for personal data) or by standard contractual clauses adopted by the European Commission (which give obligations for the recipient to safeguard the data) or, before 25<sup>th</sup> May 2018, based on the CURUFC's self-assessment of the risks involved with the transfer and its determination that the data will be adequately protected during and after the transfer. Further information about the measures we use to protect data when being transferred internationally is available from our Data Protection Officer (whose contact details are set out below).

## **Your rights**

You have the right to:

- ask us for access to, or rectification or erasure of your data
- restrict processing (pending correction or deletion)
- object to communications or direct marketing
- ask for the transfer of your data electronically to a third party (data portability)

You have the right to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## Further information

The legal basis for processing your personal data for the interdependent purposes set out above is that it is necessary for the pursuit of our legitimate interests, or the carrying out of a task in the public interest, or in the exercise of our official authority. We always handle your personal data securely and minimise its use, and there is no overriding prejudice to you by using your personal information for these purposes. In addition, there is no statutory or contractual requirement for you to provide us with any personal data.

The controller for your personal data is the Secretary of CURUFC, and can be contacted at [info@curufc.com](mailto:info@curufc.com) or by telephoning 01223 354 131

Our Data Protection Officer is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data, and can be contacted at [info@curufc.com](mailto:info@curufc.com).

Please contact us at [info@curufc.com](mailto:info@curufc.com) if you have any concerns or questions about the above information or you wish to ask us not to process your personal data for particular purposes. Where you have specific requests relating to how we manage your data, we will endeavour to resolve these, but please note that there may be circumstances where we cannot comply with specific requests.

We will retain your data indefinitely in support of your lifelong relationship with CURUFC or until you request us to do otherwise. We will publish on our website any changes we make to this data protection statement and notify you by other communication channels where appropriate.

Where you exercise your right to erasure, we will continue to maintain a core set of personal data (name, link to a captain, team details, and date of birth) to ensure we do not contact you inadvertently in the future, and to maintain your playing record for archive purposes. We may also need to retain some financial records about you for statutory purposes (e.g. Gift Aid, anti-fraud and accounting matters).

If you have any concerns about your personal data held by the University or your College, you will need to contact both the University and the College separately.