

# **All Nations Christian College**

## **Supporters and Alumni Privacy Notice**

### **1. Contents**

1. Contents
2. Introduction
3. Related Documents
4. Scope
5. Who we are
6. What information does the College collect and why?
7. How do we use your data?
8. Who has access to your data?
9. How does the College protect data?
10. For how long does the College keep data?
11. What are your rights?
12. How to contact us
13. Notice Review

### **2. Introduction**

FABS (Friends, Alumni, past and present Board Members, Staff and Volunteers) are considered to be our supporters and are at the very heart of the All Nations Christian College community. The College is committed to protecting your privacy and to meeting our data protection obligations. This privacy notice is intended to give you an understanding of how and why we use the information you provide to us via our website and otherwise.

### **3. Related Documents**

- Data Protection Policy
- Data Retention Schedule
- Website Privacy Notice
- Cookie Policy
- Enquirers' Privacy Notice
- Student Privacy Notice Summary
- Student Privacy Notice
- Student Terms and Conditions
- Student Agreement
- Employee Privacy Notice
- Casual Workers Privacy Notice
- External Library Users Privacy Notice

### **4. Scope**

This document applies to you if you have chosen to subscribe to our mailings and therefore are now classed as a Friend, or if you are an Alumni, or a past or present Board member, or former Staff member/Volunteer (FABS) of All Nations Christian College.

### **5. Who we are**

All Nations Christian College is the **data controller** in relation to the processing activities described

below. This means that the College decides why and how your personal information is processed. Where this policy refers to “we”, “our” or “us” below, unless it mentions otherwise, it is referring to All Nations Christian College.

## 6. What information does the College collect about you and why?

- 6.1 When you become a student or member of staff/volunteer of the College you are added to our data base and your personal data is stored according to the relevant privacy notice e.g. the Student, Casual Worker, Employee Privacy Notice.
- 6.2 When you become a Friend through subscribing, or an alumni, a past board member or member of staff/Volunteer, the following data (where provided) remains stored on our database in accordance with this privacy notice, which is used to process our regular mailings and contact with you:
  - **Friends (i.e Subscribers):** database no. name, title, address, email and/or phone number in order to receive the mailings you have chosen and consented to receive and a log of those communications.
  - **Alumni:** database no., title, name, address, telephone, email, date of birth, gender, marital status, relationships (e.g. spouse), nationality, ethnicity, maiden name, details of children, expected country of work after leaving college, occupation, any previous addresses, prayer updates, courses undertaken with dates and awards received, mode of course delivery, tutor group membership, whether and when you attended an Enquirer’s Day, a log of communications between us and the type of contact you have requested.
  - **Board members:** database no., title, name, address, telephone, email, date of birth, gender, marital status, prayer updates, a log of communications between us and the type of contact you have requested.
  - **Staff and Volunteers (former):** database no., title, name, address, telephone, email, date of birth, gender, marital status, relationships (e.g. spouse), nationality, ethnicity, role and dates of employment, tutor group membership, prayer updates, maiden name, a log of communications between us and the type of contact you have requested.
- 6.3 Other information includes: legacy details, donation details (since September 2015 only), mailing preferences, attendance at College events and some FABS records may also contain a copy of their photograph.
- 6.4 **We do not obtain or buy lists of people from other organisations and we do not share or sell your information to other organisations.**
- 6.5 Whilst we make every effort to maintain accurate records, it is your responsibility to inform us of any changes in your contact details to enable us to achieve this and to continue to support your mailing preferences.
- 6.6 The legal basis for processing the personal data of subscribers is consent. We believe that we also have a legitimate interest in contacting you should we need to check your contact details or mailing preferences or to respond to any other communication we receive from you, whether directly or via our website(s).
- 6.7 The legal basis for processing the personal data of FABS is that it is in the College’s legitimate interests of maintaining a relationship with you and promoting our vision, mission and values however we also rely on consent to meet your mailing preferences.

## 7. How do we use your data?

- 7.1 We use your data to communicate with you about the College via post, email, and/or by telephone. Depending on the mailing preferences you have made, this can include:
- Sending you our bulletin or e-newsletters
  - Inviting you to events (this may involve us asking you to provide information to make sure we can manage the event safely and efficiently, including any accessibility needs you may have)
  - Inviting you to support the College prayerfully and/or financially
  - Inviting you to inform us how we can prayerfully support you
  - Inviting alumni to complete the National Student Survey. If you do not want to take part in the National Students Survey, please contact them via their website at: [www.thestudentsurvey.com/about](http://www.thestudentsurvey.com/about)
  - Responding to your enquiries and news
  - Acknowledging donations/legacies
  - Inviting subscribers to confirm or renew consent and/or amend your mailing preferences
  - Communicating with you regarding your current or former studies, employment or the role you had/have with us.

## 8. Who has access to your data?

- 8.1 **College Staff:** The Communications Team and our Receptionists have primary responsibility for processing your data by putting your information on our database and facilitating the submission of your mailing preferences. Given that our database also includes visitors to our Enquirers' Days, those who apply for our courses, students and staff past and present, other College administrative staff also have access to this data. The IT department have access when they are required to provide technical support in order to fulfil their roles and responsibilities.
- 8.2 **Third Parties:** We will never sell, distribute, or lease your personal information to third parties. However, those providing technical support may have access to your name and contact details. All third parties are obliged to be compliant with data protection legislation. Third parties who may have access to your data include:
- IT Support:** Our website host, printers and mail distributors, have an agreement with us to use the personal information we provide them only to provide, support or improve their services to us. They are obliged to never sell our subscriber lists and neither they nor their third parties (where applicable) have a direct relationship with you nor advertise their services to you.

Our external IT support are also able to access your personal data if it is stored on our network. They are only able to access this for technical support and at our request and are legally bound not to breach anyone's privacy in performing their duties.

- Internet Facilitators:** When you browse or use our website to contact us, by default your computing device will also send information to us, such as your IP address and other device specific information in order to enable the website to function as it should. However, this only identifies devices, not the people who use them. Google Analytics collect standard internet log information and details of visitor behaviour patterns to help us improve visitor experience Cookies also enable us to improve the usability of our website. Please see how we use cookies on our Cookies page on our website:

<https://www.allnations.ac.uk/cookies-policy> Please note that when you send an email to us, it is transmitted from server to server as it crosses the Internet. Along the way, server administrators can read what you send and we cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred.

- iii. **Payment facilitators:** Subscribers who choose to donate or make a payment to the College of any kind should also know that Barclaycard EPDQ, provides the means for us to accept and process card payments where the cardholder is not present. For more information please see their website: <https://www.barclays.co.uk/important-information/privacy-policy/>

## 9. How does the College protect data?

- 9.1 The College takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. We use a secure server for computer files and only permit access to our website using secure connections. We also encrypt all personal data held digitally. When we store paper records, they are always kept in locked cabinets or rooms which are locked when unoccupied, with access only available to those who need to do so.
- 9.2 The College will not transfer data outside the European Economic Area, except where subscribers have provided us with contact details outside the EEA and when using the services of Mailchimp. Mailchimp adheres to the Privacy Shield Principles and are Privacy Shield certified. They are listed on the US Department of Commerce Privacy Shield website as [The Rocket Science Group LLC d/b/a MailChimp](#).
- 9.3 We take every care when communicating with supporters in sensitive locations, to ensure as far as possible that we do not compromise their safety by only ever contacting them through the contact details they provide.
- 9.4 **Your security responsibilities:** If you choose to make a login account with us via our website(s), you remain responsible for keeping your user ID and password confidential. Also, please note that our sites may contain links to other sites of interest. However, once you leave our site, we do not have any control over those other sites and such sites are not governed by this privacy notice.
- 9.5 **Breaches of security:** If for some reason we experience a breach in our security, we will fulfil our legal obligation to inform the data protection supervisory authority, The UK Information Commissioner's Office (ICO) within 72 hours. We will inform you if there is a possibility that you might have been or you have been harmed by any breach.

## 10. For how long does the College keep data?

- 10.1 We believe the relationship we have with you is a life-long one and so we retain your data until such time as you request to be made inactive. Please allow at least one month for this request to affect all mailings. Please allow at least one month for this request to affect all mailings.
- 10.2 We will always maintain a record on our database containing at least the biographical and educational and/or work details of alumni, board members, staff and volunteers for statistical purposes and to ensure we do not inadvertently contact you in the future.
- 10.3 Other communications from subscribers are deleted when we have sent a final response. Data contained in requests which require forwarding to a specific department are kept according to that department's privacy notice and according to our Data Retention Schedule.

10.4 We are obliged to contact Subscribers and FABs every six years to ask them to renew their consent to receive communications from us. However, you may withdraw your consent or amend your mailing preferences at any time by clicking unsubscribe in our emails to you or by contacting us directly.

## 11. What are your rights?

11.1 As a data subject, you have a number of rights. You can:

- access and obtain a copy of the information we hold about you, on request;
- require the College to change incorrect or incomplete data;
- require the College to delete or 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 College is relying on its legitimate interests as the legal ground for processing.

11.2 Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted and if we have a legitimate reason for doing so.

11.3 If you believe that the College has not complied with your data protection rights, you can complain to the data protection supervisory authority, The UK Information Commissioner's Office (ICO), which can be contacted at <https://ico.org.uk/concerns/handling>

## 12. How to Contact Us

12.1 If you would like to exercise any of the above rights, have any queries about this privacy notice or about the way we process your personal information, please direct any queries to our Data Protection department using the contact details below.

- Email: [info@allnations.ac.uk](mailto:info@allnations.ac.uk)
- Telephone: +44(0)1920 443500
- By post: Data Protection, All Nations Christian College, Easneye, Ware, Herts, SG12 8LX
- You can update your mailing preferences here:  
<https://allnations.accessconsent.com/home> or by contacting: [network@allnations.ac.uk](mailto:network@allnations.ac.uk)

12.2 If you would like to access a copy of your data, you may find it easier to use the form you can find here: [https://www.allnations.ac.uk/sites/default/files/PDFs/Data Subject Access Request Form.pdf](https://www.allnations.ac.uk/sites/default/files/PDFs/Data%20Subject%20Access%20Request%20Form.pdf)

12.3 We will make every effort to respond to you within 7 days and within no more than 30 days.

## 13. Notice Review:

This notice is effective from May 2019. We will review it regularly and will update it when necessary, so please check back from time to time.

registered company (No. 1189164) VAT Reg. No. 214 7013 06. Both companies have a registered address of: Easney, Ware, Hertfordshire, SG12 8LX.