



CUSWPC PRIVACY POLICY

1 Data Protection Statement

Due to your association with CUSWPC and/or its alumni counterpart, the Harold Beale Club, you have provided us with contact details so that we could keep you up to date with Club events and achievements, and share information relevant to CUSWPC alumni such as newsletters, invitations to annual events and information on how to support the club,

We are committed to protecting your personal information and being transparent about what information we hold.

2 Personal data that we hold

We may hold information relating to you from a number of sources. A significant proportion of the information we hold is that which you provide to us through forms and correspondences.

Our records may contain:

- Details of University education;
- Unique personal identifiers and biographical information (e.g. student number, year of birth);
- Contact details (these are updated whenever possible);
- Details of your interactions with CUSWPC, including:
 - Membership and achievements with the Club;
 - Attendance at CUSWPC events;

- Details of benefits and services provided to you;
- Your relationships with other members and/or supporters;
- Personal data provided by you for a specific purpose (e.g. disability and dietary preferences for event management purposes);
- Communication preferences, to help us provide tailored and relevant communications.

CUSPWC also records, 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 CUSWPC;
- Information about your areas of interest and extra-curricular activities.

CUSWPC augments the data we hold with data from our partners (as listed below) and publicly available data.

CUSWPC uses 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:

- LinkedIn;
- Facebook;
- Twitter.

3 How we use your data

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

- Sending publications (e.g. magazines and updates about our activities);
- Conducting surveys, including research on when and whether particular donations or funding appeals may be of interest to you;

- Providing services;
- Sending tailored proposals, appeals and requests for donations;
- Sending details of volunteering opportunities;
- Invitations to CUSWPC events;
- Internal record keeping, including the management of any feedback or complaints;
- Administrative purposes.

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 may be sent by post, telephone or electronic means (principally by email), depending on the contact details we hold, the consent that you have provided, 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 CUSWPC communicates 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 us, 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 our 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.

4 Sharing your data with our partners

CUSWPC shares the above categories of data with the University and the Cambridge Colleges to provide you with a co-ordinated approach. Any transmission of data to or from the University and Cambridge Colleges is managed through agreed processes which comply with relevant data protection legislation. The University and each Cambridge College has its own data protection statement and procedures.

Additionally, we share the above categories of data on a considered and confidential basis, where appropriate, with:

- Third parties engaged by us to provide fundraising related services, such as:
 - Companies that 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 products and services that we endorse.

5 How we protect your data

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

We do not sell your personal data to third parties under any circumstances.

We facilitate communication between individual members, 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), 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).

Further information about the measures we use to protect data when being transferred internationally is available from us (via the contact details are set out below).

6 Your rights

You have the right to:

- Ask CUSPWC for access to, 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/>

7 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. 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 Cambridge University Swimming and Water Polo Club and Harold Beale Club and we can be contacted at cuswpc.president@gmail.com (CUSWPC Junior President).

Please contact us 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 us or until

you request us to do otherwise. We will publish 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 and membership details and year of birth) to ensure we do not contact you inadvertently in future. We may also need to retain some financial records about you for statutory purposes (e.g. Gift Aid, anti-fraud and accounting matters).