



UNIVERSITY OF
CAMBRIDGE

**Development and
Alumni Relations**



Data protection recommendations for European University Alumni Groups, Clubs, and Societies

Introduction and context

This note provides data protection recommendations to University Alumni Groups, Clubs and Societies which conduct alumni relations or fundraising and which are based in the European Economic Area (or which have members resident in the EEA¹). This note is not aimed at groups run by students, for students.

New European data protection legislation will come into force on 25th May 2018, superseding existing Member State legislation. In the UK, the new legislation is expected to survive Brexit.

There are three practical steps to be taken before May 2018:

- You need to publish a data protection statement meeting the stringent requirements of the new legislation, providing a high level of transparency on the personal data that you hold and process.
- You need to *provide* your data protection statement to your members.
- You need to hold records of consent for your members to receive electronic direct marketing, which includes volunteering opportunities, event invitations, offers of benefits and services or fundraising requests, and newsletters containing any such offers.

These are the minimum steps required to be compliant with new legislation. Additional best-practice guidance is available from the website of your National Data Protection Authority². A serious breach of the new legislation carries a potential fine of up to €20m.

What is personal data?

Personal data is any information that directly or indirectly identifies a living person.

What is electronic direct marketing?

Electronic direct marketing includes volunteering opportunities, event invitations, offers of benefits and services, fundraising requests, and newsletters containing any such offers sent by email, text, social media, or telephone.

1 https://en.wikipedia.org/wiki/European_Economic_Area

2 https://en.wikipedia.org/wiki/National_data_protection_authority



Updating your data protection statement

The accompanying data protection statement template is based on the University's data protection statement for alumni and supporters, published at alumni.cam.ac.uk/data-protection

You should update the template carefully to reflect accurately what personal data you store, third parties with whom you share personal data, how you process personal data, and for what purposes. Note that the categories of information provided in the template are required by the new legislation.

Providing your data protection statement

The new legislation requires you to *provide* your data protection statement to your members. You should achieve this by:

- publishing the data protection statement on your website
- linking to the data protection statement in all relevant emails, newsletters, and postal communications

Collecting consent for electronic direct marketing

Legislation requires that you hold consent for electronic direct marketing:

- Consent means any freely given, specific, informed and unambiguous indication of your members' wishes by a clear affirmative action; silence, pre-ticked boxes or inactivity do not therefore constitute consent.
- Requests for consent must be intelligible and easily accessible, using clear and plain language.
- You must be able to demonstrate that your members have provided consent.
- You must make it as easy to withdraw as to give consent.

The most straightforward means to collect consent is via a set of opt-in boxes which must not be pre-ticked, one for each category of electronic direct marketing.

You must provide a means on each direct marketing email to allow people to withdraw their consents.



Example form for collecting consent:

We'd love to stay in touch with you. However, you are in control: tick the box next to the options that you wish to receive:

- ☐ Volunteer to help us.
- ☐ Receive invitations to our events.
- ☐ Receive our monthly e-newsletter.
- ☐ Provide us with financial support.

Please email us at leader@group.com if you wish to change your preferences.

Further information

You can ask us general questions on this topic at networks@alumni.cam.ac.uk. However, we are unable to discuss issues specific to a particular Alumni Group, Club, or Society.

The information and recommendations provided in this note are based on research we have undertaken to ensure the University's compliance with relevant legislation. However, please bear in mind that these recommendations do not constitute legal advice.