

The Rhodes Trust – Alumni, Donors and Supporters Privacy Notice

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The Rhodes Trust holds personal records on Rhodes Scholars and others who interact with us. Our principles are simple – we will be transparent about what data we are collecting about you, where that data comes from, how we use the information we hold about you, and the choices you can make.

The overarching purpose of collecting and processing your data is to provide you with the best possible experience of being a Scholar, donor, or supporter of the Rhodes Trust. It also enables us to ensure that any approaches we make to ask for your support of our alumni relations or fundraising goals are respectful, professional, and relevant to you.

If at any point you have questions about our privacy notice, or how we are using your data, please contact us at the details given below.

1. About this privacy notice

The purpose of this privacy notice is to explain how the Rhodes Trust ("the Trust", "we", "our", "us") holds and uses personal data about Scholars, donors and supporters ("you"), and how we use it for the purposes of fundraising and alumni and supporter relations. The Rhodes Trust includes fellows and other employees at the offices at Rhodes House in Oxford and our international offices, who work in support of our aims, our Rhodes Scholars and our partnerships worldwide.

2. What we do

The Rhodes Trust's Development and Alumni Relations teams exist to establish and develop lifelong relationships with and amongst our Scholars, donors and supporters. This includes via international networks such as the Atlantic Institute and fellowship programmes such as the Schmidt Science Fellows. We're here to help you stay connected with each other and with the news, events, fundraising priorities and progress updates that are important to you.

3. The data we collect about you

We collect information about you either directly from you during your ongoing relationship with us, from our National Secretaries, from the recognised Alumni Associations, from publicly available sources and/or from third parties providing us with services or acting on our behalf. We provide more detail about these third party and public sources below.

We may hold and process the following types of personal data about you:

- Biographical information, which may include:
 - name, title, date of birth, gender, marital status, spouse, partner and family details
 - where you live and other contact details
 - education history
 - involvement in sports teams, clubs and societies whilst at Oxford and elsewhere
 - employment details, career history, professional activities
 - interests, activities, honours and achievements
 - profile pictures

- links to your public social media presence e.g. LinkedIn, Twitter, website or blog and information that you make public on those sites
- Details of our ongoing relationship and your engagement with us, which may include:
 - records of your personal interactions with us (e.g. correspondence, notes of meetings or conversations)
 - your communication preferences; records of communications you have received from us, incl. copies of letters, emails or appeal literature sent, and of fundraising activities in which you have been included (e.g. annual fund mailings, telephone fundraising campaigns); records of your interests and support for our events and projects
 - your attendance (and that of your guests) on visits to, or at Rhodes Trust events, including details of any payments made, and photographs, audio and video recordings in which you may be included
 - your relationship to relevant trusts, foundations and corporates, e.g. membership on board of Trustees
 - membership of social media groups e.g. Twitter, LinkedIn and your interactions with our own social media accounts
 - a record of offers of voluntary support you have made, e.g. offers of expertise, advice, mentoring
 - a record of volunteer work you have undertaken
 - data obtained through cookies and similar technologies. These help us understand how you interact with our website (see cookie policy).
- Information about your giving, which may include:
 - current and past donations and pledges, documentation relating to these gifts and records of the projects you have supported
 - financial information required to process your gifts
 - if you have given it, an indication of your intent to leave a legacy
 - any requests you have made for anonymity in relation to your giving
 - thank you letters, donor reports provided relating to gifts you have made, correspondence and notes of meetings
 - plans for activities and future interactions
- Information relating to your willingness or financial capacity to support our charitable objectives, which may include:
 - our understanding of your likely philanthropic interests, and a note of particular projects we think may be of interest to you. This understanding may be provided by you or from information in the public domain
 - information about your giving to other organisations, and other support that you provide (e.g. volunteering roles, trusteeships), where this information is given to us by you or publicly reported, and where it helps us to understand your interests and capacity to provide support
 - other information which may give an indication of the scale of any potential philanthropic gift you may be able to give, such as information about earnings and assets, including property, and/or publicly reported estimates of wealth
 - any estimate we may make regarding the potential scale of your support on the basis of the above information and your previous giving
 - personal recommendations, where made by other supporters, that you may be willing and able to provide support

- Sensitive (“special category”) personal data where necessary, which may include:
 - health information, including any medical conditions – we may collect and use health information provided directly by you so we can make reasonable adjustments to improve the service we are able to offer you and to look after your wellbeing while attending our events or visiting Rhodes House.
 - race or ethnicity, religious beliefs, sexual orientation, political convictions - we do not generally seek to obtain these categories of sensitive data however, they may sometimes be inferred from other data we hold, for example, your relationships, job titles, donations to specific causes or interests. We may obtain these types of data if you have made them public; or if you give them to us, for example when writing a blog post on the Rhodes Scholar Network or when you register for an event; or if the nature of our relationship with you means we need them to comply with equalities legislation.

4. How we use your personal data

Your personal data are used by us for the following purposes in support of alumni and supporter relations, and fundraising:

For alumni and supporter engagement

- To assist our alumni relations work around the world.
- To promote and manage a varied programme of events tailored to your interests.
- To engage alumni and supporters in our partnerships and programmes, such as the Atlantic Institute and the Schmidt Science Fellows.
- To manage our ongoing relationship with you and to provide a record of your interactions, event attendance and contributions to the Rhodes Trust.
- To share Scholar news of interest to the wider Scholar community on our website.
- To accept and process payments, e.g. for accommodation or event tickets.
- To provide childcare at events.
- To undertake surveys and market research.
- To create and distribute event participant lists.
- To analyse the success of our engagement activities, collect feedback, and manage complaints.

For all fundraising and donor stewardship

- To accept and process donations.
- To provide acknowledgement, recognition and stewardship of your gift.
- To inform you of the impact of your gift.
- To promote and manage a varied programme of events tailored to your interests.
- To manage our ongoing relationship with you and to provide a record of your interactions, event attendance and contributions to the Rhodes Trust.
- To accept and process payments, e.g. for event tickets.
- To ask you for your support for our fundraising programmes.
- To inform fundraising, marketing and donor stewardship strategies.
- In addition to analysing data shared with us, we may use publicly available information and recommendations from staff, Scholars and supporters to identify individuals who we believe may have the interest and financial capacity to make a major gift.
- Where we have reason to think a potential donor may possess an interest and financial capacity to donate, we may research and collate additional information from sources in the public

domain, typically concerning a potential donor's interests in so far as they may coincide with our work, their philanthropic activity, financial capacity and networks in order to substantiate this. We may undertake this research ourselves or use the services of a third-party partner. This new information may be added to the record of a donor or potential donor.

- Where this activity is being undertaken for a new contact with whom we have no previous relationship, we will provide the individual with a link to this privacy notice as part of our initial engagement and no later than within six months of the initial processing of their data.
- Information may be collated into a briefing or profile in order to assist the planning of an approach to a potential donor to discuss that individual's interest in our work and in supporting it.
- We may also carry out due diligence on potential donors using publicly available information in order to comply with our policy on the acceptance of gifts, and to fulfil our legal responsibilities.

For operational reporting, management reporting, and governance

- We may use your personal data for the purposes of operational reporting, to produce management information, and for other relevant purposes relating to the governance of the Rhodes Trust.

In our external communications

- To publish your name in an online directory, in donor listings or as part of a guest list.
- To work with you to create press releases or case studies to be included in our publications, on our website, in fundraising material and on our social media feeds.
- To promote Rhodes Scholars and the Rhodes Trust by sharing Rhodes Scholar news on our website and our social media feeds. News shared may include your achievements, appointments, awards and publications. We may get these from yourself or from publicly available information.
- To keep you informed of news relating to the Rhodes Trust and the wider Rhodes Scholar community. You may ask us to stop sending these at any time by using the unsubscribe link in each email or by contacting us separately.

Except where we are acting on your direct wishes, directly fulfilling or entering into a contract or transaction with you, or acting subject to a legal obligation, we consider these purposes to fall within our legitimate interests (see further below). If you do not wish your data to be used in any of the ways listed above, or have any questions, please contact us.

5. When and how we share your data

We will, from time to time, share your personal data with our National Secretaries, recognised Alumni Associations or with third parties working on our behalf (for example IT or other support service providers and organisations that work in partnership with us) whether inside the EEA or outside. We will only do this in appropriate circumstances, by secure means, and with the relevant data sharing or data processing agreements (as applicable) in place. We do not, and will not, sell your data.

Sharing with Alumni Associations will generally be to assist in their own alumni and supporter engagement purposes, similar to those of the Rhodes Trust as set out above, and to ensure that the personal data they hold on Alumni is accurate and up-to-date.

Third party service providers and processors will only process your personal data on our instructions and where they have agreed to treat your data confidentially and to keep it secure. We only permit them to process your personal data for our own specified purposes, being those stated in this notice. We do not allow our third-party service providers to use your personal data for their own purposes nor to keep your data after the processing is complete. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies.

Whenever your information is shared, we will always seek to share the minimum amount of information necessary to fulfil the purpose.

Your data may also be shared in the following ways:

1) Rhodes Scholar Network

If you are a Rhodes Scholar, unless you request otherwise, a basic profile will be set up for you on the Rhodes Scholar Network with your name, election region and year. This profile will remain inactive until you access the Network for the first time. We suggest that you build up your profile with the following information, so that it may be searchable by your fellow Scholars:

- Rhodes degree course
- Industry experience and interests
- City and country of residence

It is possible to manually change your settings to show more or less information on your profile.

2) Class Leader Programme

In 2012, the Rhodes Trust created a volunteer network of Rhodes Scholar Class Leaders, inclusive of all constituencies and Rhodes class years that works cohesively to strengthen the connectivity among Scholars around the globe. Class Leaders are required to sign a confidentiality agreement, prior to being provided with a list of contact details for Scholars in their class.

If you do not want your contact details shared with Class Leaders from your election year, please contact the Rhodes Trust Development Office (development@rhodeshouse.ox.ac.uk).

3) University of Oxford Development Office

The Rhodes Trust works in cooperation with the University of Oxford Development Office and may share data on giving in an effort to improve our communications with you. Donations to the Trust are also counted towards the Oxford Thinking Campaign.

4) Where necessary, with partner organisations that accept gifts in support of the Rhodes Trust

Including, but not limited to: Americans For Oxford, American Trust for Oxford University, Benevity, CanadaHelps, Deutscher Rhodes Scholars e.V, Oxford University Development Office, Oxonian India Foundation, Rhodes Scholarships in Australia, Rhodes Scholarships in Canada, Rhodes Scholarships in New Zealand, Rhodes Trust in South Africa

5) With third-party organisations engaged by the Rhodes Trust to provide services including outsourcing of core systems or functions such as IT, or when obtaining professional advice.

6. Our legal basis for processing your data

We will only process your personal data where the law allows us to do so. Most commonly we rely on the following legal bases for processing your personal data:

- Where we have a legitimate interest to do so for purposes listed within this privacy notice. Where we use legitimate interest as the basis for our processing we will carefully consider each of the ways we process your data to ensure that we carry out our activities with a focus on your interests, and in the most efficient and effective way, balanced against your rights and interests.
- Where we need to perform the contract we have entered into with you, or to enter into it initially. Information processed for this purpose includes, but is not limited to, the information you provide when you apply for a Rhodes Scholarship or register for an event.
- Where it is required for us to process a donation.
- Where we are required to comply with our legal obligations, such as for reclamation of Gift Aid on your donations or responses to the Charity Commission or ICO in relation to audits or official investigations.
- Where your consent is required, for example sometimes where sensitive personal data (as above) is recorded. You can withdraw your consent at any time and we will stop any processing of your personal data requiring your consent (unless for example it would be in your or another's vital interests to continue such processing).

Change of purpose

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose (which might include reasonable retention periods, archiving and historical research). 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, giving you the opportunity to object if appropriate. Please note that we may sometimes have to process your data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. International transfers

Most of the personal data we process stays in the UK although some users from the Rhodes Trust, including those within our international offices, may access your personal data held in our IT systems from outside the European Economic Area (EEA). We may also share data with consultants, service providers, partners and others working on our behalf outside the EEA. In all cases we will make sure transfers are made securely, to countries deemed adequate by the European Commission and/or subject to appropriate safeguards, except where acting on your specific instructions.

7. Data security

The Rhodes Trust takes the security of your data very seriously and we have appropriate security measures in place to prevent your personal data from being accidentally lost or misused. Access to your personal data is limited to those employees, contractors and other third parties who have a need to know (and who will be competent and subject to appropriate obligations of confidentiality). They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

8. How long we keep your data

The Rhodes Trust considers its relationship with alumni, donors and supporters to be life-long and we will retain much of your data indefinitely unless you request otherwise. When we no longer need to retain personal information we ensure it is securely disposed of. We may also keep anonymised statistical data indefinitely.

9. Your legal rights

Under certain circumstances, you have the right to:

Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of your data and to check that we are lawfully processing it.

Request correction of your data. This enables you to ask us to correct any incomplete or inaccurate information we hold about you.

Request erasure of your data. This enables you to ask us to delete or remove your data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).

Object to processing of your data where we are processing it to meet our public interest tasks or legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your data for direct marketing purposes.

Request the restriction of processing of your data. This enables you to ask us to suspend the processing of your data, for example if you want us to establish its accuracy or the reason for processing it.

Depending on the circumstances and the nature of your request it may not be possible for us to do what you have asked, for example, where there is a statutory or contractual requirement for us to process your data and it would not be possible to fulfil our legal obligations if we were to stop. However, where you have consented to the processing, you can withdraw your consent at any time by emailing the relevant department. In this event, we will stop the processing as soon as we can unless there is an overriding and lawful reason not to. If you choose to withdraw consent it will not invalidate past processing, including where personal data has been published.

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, please contact us at: data.protection@rhodeshouse.ox.ac.uk. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

If you remain dissatisfied, you have the right to lodge a complaint with the Information Commissioner's Office at the ICO website www.ico.org.uk.

10. Contact us

If you have any questions about this privacy notice or about your personal data, or if you want to provide updates to your data or exercise any of your rights as outlined above, please use the details



below, and quote your name and, if you are a Rhodes Scholar, your Rhodes identifier – ('Election country/region' & 'College' 'Election year'):

The Rhodes Trust
Rhodes House, South Parks Road
Oxford, OX1 3RG, United Kingdom
Email: data.protection@rhodeshouse.ox.ac.uk

We reserve the right to update this privacy notice at any time. Any changes to this privacy notice will be posted to this page.