

# HVERFORD COLLEGE

## **Institutional Advancement Privacy Notice and Data Protection Statement**

Here at Haverford College's Institutional Advancement Office (the College, we, us) we take your privacy seriously and will only use your personal information to administer your account and to provide services you have requested from us. The College is a data controller which means we are responsible for deciding how we use and hold your data. We have set out relevant information about our approach to personal data below.

### How do we collect this information?

If you are a student or studied at Haverford, some of your personal data is transferred from your student record to the College's Institutional Advancement database. Most records contain:

- some details of your education (e.g. major(s)/minor(s)/concentration(s) you have completed, type of degree, year of graduation or anticipated graduation, preferred class year, reason for leaving)
- unique personal identifiers and biographical information (e.g. student identification number, date of birth, home address)
- your contact details (we update these whenever you let us know that they have changed)
- your employment history including employer, business address and contact information, job title, position, and employment status
- details of your interactions with the College, including:
  - your attendance at College events
  - other contact with us
  - contact with volunteers
  - your relationships with other alumni or supporters of the College
  - details about your family (e.g. your marital status, the name of your partner or spouse, familial relationships, relationships to the tri-college (Haverford, Bryn Mawr, Swarthmore) communities)
  - personal data provided by you for a specific purposes (e.g. 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 including:

- your history of donations made to the College including gift amount, purpose, date and method of payment
- 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 extracurricular activities

We add to the data we hold with data from other sources (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:

Sources for companies and career information (in order to find personal data of those companies' employees, etc.):

- [US Securities and Exchange Commission for US companies](#)
- Company websites

Sources for charities (in order to find personal data of those charities' employees, trustees, etc., and to find information about donations and support):

- [GuideStar](#)
- [Foundation Directory](#)

Sources for individuals (in order to find individuals' employment details, contact information, and wealth profiling) for :

- Property websites (inc. [Zillow](#))
- [Blackbaud](#) - U.S. National Change of Address Service
- [LinkedIn](#)
- [New York City Department of Finance, property records](#)
- [ResearchPoint](#)

Press sources (in order to learn of individual's career details):

- [Fortune](#)
- [Forbes](#)
- [New York Times](#)
- [Philadelphia Business Journal](#)
- [Philly.Com](#)
- [Washington Post](#)
- [Wall Street Journal](#)

You have the right to have old information updated to make it accurate as well as to provide additional information to us to make information complete. Please let us know if your personal data changes in the future. Alumni and parents may update their information through online

[alumni](#) or [parent](#) portals. These are password-protected, sites at [fords.haverford.edu](https://fords.haverford.edu). Any one at any time may make changes by contacting [devrec@haverford.edu](mailto:devrec@haverford.edu).

### How will we use your information?

Your data is used for a number of purposes in support of alumni and parent relations, friends and neighbors programs, communications, volunteering, and fundraising.

These include:

- sending you publications (e.g. magazines and email updates about the College and its programs)
- conducting surveys, including seeking updated contact information
- providing services, including access to the alumni directory, and career networking opportunities
  - Note: alumni can manage what personal information is shared (sharing all, some, or none) in the alumni directory via settings in their online profile at [fords.haverford.edu](https://fords.haverford.edu)
- organizing alumni reunions (when applicable)
  - providing contact details to reunion volunteers
  - providing giving details to reunion volunteers
- sending you requests for donations
- sending you details of volunteering opportunities
- inviting you to College events
- providing biographical information to volunteer hosts at College events you attend
- the promotion of other opportunities and services available to you (e.g. offers and opportunities available through the College's [many affinity groups](#) and programs organized by the College's [Center for Career and Professional Advising](#))
- wealth analysis and research
- 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)

We will only use your data for the purposes set out above unless we reasonably consider it necessary to use it for another reason which is compatible with the original stated purpose. 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.

Please know that we have not hired any companies to contact alumni nor parents, and there is no cost to be in our registries.

Communications to you may be sent by mail, telephone or electronic means (principally by email), depending on the contact details we hold and the preferences expressed by you about how we use your personal data and 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 [devrec@haverford.edu](mailto:devrec@haverford.edu), 610-896-1209.

We may use automated or manual analyses to link data together to help us identify your potential for supporting the College, 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 the College's strategic objectives. We always seek to ensure that any opportunities we present are aligned with your interests, based on the data we have.

#### Lawful Bases for Processing Your Information

The lawful basis for processing your personal data for the purposes set out above is that it is necessary for pursuit of legitimate interests. Our legitimate interest in processing your personal data is to target our communications more effectively, improve our program offerings, improve our understanding of our supporters, and inform our fundraising strategy. Where relevant, we have considered whether the interests or fundamental rights and freedoms of our alumni, parent and friend constituents override our legitimate interests and have formed the view that they do not.

#### Who else do we share this information with?

We share the above categories of data with relevant employees of the College and key volunteers. Any transmission of data is managed through agreed processes which comply with relevant data protection legislation, and we have security measures in place to ensure that access is strictly limited to those individuals who need to see it for the proper performance of their duties.

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:

- volunteer partners in various capacities (e.g. development and advisory board members, alumni affinity groups including regional societies and alumni group representatives, parent volunteer groups, career advising staff and volunteers)
- companies that provide constituent resources including event registration and directory information ([Finalsite](#))
- companies that provide gift platforms ([GiveCampus](#), [Finalsite](#))
- third parties engaged by the College to provide fundraising related services, such as:
  - third party agencies who provide us with data about current and future supporters ([ResearchPoint](#))
- other contractors providing services to you on our behalf or services to us selected companies (Alumni Travel)

We will not sell, trade, or give away any of the personal information you have provided.

#### 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 the data we have shared with them. 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) or, before 25 May 2018, based on the 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).

#### How long will we keep this information?

We will retain your data indefinitely in support of your lifelong relationship with the College 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, subject(s), matriculation and graduation details, unique College identification number and date of birth) to ensure we do not contact you inadvertently in the future, and to maintain your academic record for archive purposes. We may also need to retain some financial records about you for statutory purposes (e.g. gift information for accounting matters).

#### Data Subject Rights

##### Right of Access

You have the right to access your information on file with the College.

Please contact the College's Institutional Advancement records office at [devrec@haverford.edu](mailto:devrec@haverford.edu) , 610-896-1209 to initiate this request.

##### Other Rights

You have the right to:

- request rectification of your personal data.
- request to have your personal information removed\*.
- request that the processing of your personal data is restricted.
- object to the processing of your personal data, and/or

- request the transfer of your personal data to another party.

If you wish to exercise any of these rights, please send an email to [devrec@haverford.edu](mailto:devrec@haverford.edu).

\*Please note that the complete deletion of data will not be possible in order for the College to comply with its regulatory requirements.

#### The College's Data Protection Officer

The College's Data Protection Officer is its Chief Information Officer Megan Fitch who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data, and can be contacted at [mfitch@haverford.edu](mailto:mfitch@haverford.edu), 370 Lancaster Avenue, Haverford, PA 19041 United States Phone: 610-896-1045

Questions? Please contact us at [devrec@haverford.edu](mailto:devrec@haverford.edu) 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.

[rev. 25 May 2018]