Purpose of this Notice

This Notice explains how the University, through its Office of Institutional Advancement, will collect and use your personal data for alumni and development activities.

Please see below more information on the alumni and donor activities covered by this Notice.

Throughout this Notice, "University" "we", "our" and "us" refers to the University of Pittsburgh. "You" and "Your" refers to University alumni and donors, together with other individuals involved in alumni and development activity.

We are the data controller for personal data that we process about you.

The University's Commitment to Alumni, Donors, and Friends

When you are a student of the University, you automatically become a member of the University and normally become a member of the University alumni community. The University is committed to providing alumni services to University alumni, donors, and friends. The University regards these services as an important and integral part of the University's long-term commitment to its students, alumni, and friends.

A member of the University alumni community is someone who:

- has received a degree or certificate from the University or
- has completed 15 or more credits toward graduation and has left the University in good standing or
- is a Life Member of the University Alumni Association.

A donor or friend of the university is someone who has asked for access to a publication, attended an event, donated to the university or any other activity associated with the university.

Where does the University get your personal data?

We obtain personal data regarding you from the following sources:

The University

- via a transfer from the Office of the University Registrar student central and local databases (if you were a student) to the alumni database upon graduation, or if you are in receipt of a scholarship and the money has been raised via the Alumni and Development
team your data is transferred when your scholarship is allocated for administrative purposes.

Data you provided when you

- provided information through one of our websites, newsletter communications, volunteering discussions or donations
- completed and returned surveys or response forms, such as contact preference forms, (by mail, email or via a University website)
- discussed it with University representatives
- registered to attend a university related event
- donated by the university
- asked to be added to receive any other publications or newsletters.

Third party sources

- from third party sources such as organizations that assist us with pursuing our purposes described below, media articles, company and, charity filings or social networking posts or other public sources for example the world wide web.

Categories of personal data being processed

We will collect and process personal data about you.

Personal data may contain "special categories of data" as described under the GDPR. Such “special categories of data" includes information about your racial or ethnic origin, religious beliefs or other beliefs, physical or mental health or information concerning any criminal offences or criminal proceedings. This data would only be used if (i) you have directly provided it yourself (with your consent), for example during one-to-one conversations with our representatives or collected for event management purposes e.g. for assessing access requirements arising from a disability or (ii) it has been sourced from information that we believe you have clearly made public, for example details of patrons/trustees/supporters on charity/society websites.

The data we may process includes:

- your title, name (including former name or alias), gender, date of birth
- your education record (i.e. year of study and degree details) but we do not retain transcripts. Qualifications from other universities may also be held. Transcripts are held in the Office of the University Registrar.
- the European Union societies and clubs that you joined
• your contact information (address, telephone, email, social media)
• your business details including positions, organization, and professional memberships
• your career highlights and other lifetime achievements
• your outside interests and membership of groups
• information about your wealth
• information from articles in the media about you
• your family details, including spouse or partner, and relationships with other alumni, supporters and potential supporters
• events you have been invited to and whether or not you have responded or attended
• your donations of time, expertise or money
• we will keep a record of interactions with you for future reference and to help tailor further communications with you; as part of this, some emails sent by the University may record whether the email has been opened and whether any links have been clicked on
• generally information that you have decided to share with us

As with most websites, certain actions you take will be recorded anonymously as cookies by the University's websites.

**The purposes for which we process your personal data**

We will use your data to help us maintain an engaged alumni community. Please see the Communication section for information on the communication that we may have with you. We may also process your personal data for the following purposes:

**Administration**

• to verify an account and provide a personalized experience for you when you register on the website
• to process a gift you have given
• event registration
• to process and organize any volunteering activity you have agreed to undertake
• to process information you provide for use on other University websites for example to keep a record of communications between you and us
Fundraising and volunteering

Fundraising supports:

• scholarships for our students
• University research
• improvements to the University's structure and facilities
• student activities
• arts and cultural activities

Volunteering supports:

• mentoring
• internships
• careers support for students and graduates

Reunions

On occasion members of the alumni community host reunions. To help the organizer establish who to invite the University provides some information.

The University provides organizers with details of alumni from a selected year group and school/major as requested by the organizer. Details provided include first name and surname (as it appears on the University’s alumni database), degree, school/major, and year of graduation. Details usually indicate who the University is in contact with and who is deceased.

Research

To ensure that we do not make inappropriate requests in our fundraising and volunteering communications, we may carry out research to assess your likely ability and willingness to make gifts to or volunteer for the University.

This research may include collecting and storing data relating to you that is in the public domain (such as career history, directorships, shareholdings and remuneration) as well as data that has been provided by you, including your interests, and University activity you have previously been involved with (donations, volunteering, event attendance etc.) This research is sometimes known as prospect research or wealth profiling.
Profiling and planning

We use your data (such as your postcode, subject of study, age, gender and level of engagement with the University) to help us plan our activities, and determine if we should contact you with certain communications, or information about particular activities. It helps us identify how our alumni are involved with the University, and which alumni activities are most popular. This research helps ensure our communications (including fundraising or volunteering requests) are relevant and of interest to you.

Due Diligence

Please note that if you wish to make a gift to the University we may process your personal data, including information from the public domain, for due diligence purposes.

Keeping your data up to date

We will update the data we hold on you from time to time. For example, if you provide us with new contact details or change your details on websites managed by the University or social media sites such as LinkedIn. We will respond to your request for your data to be updated.

We may update your contact details by using third party sources/services. We also use these services to check if there are people we should no longer contact (for example, if someone has died). Where third parties provide these services to us they are only allowed to use your data in accordance with the strict instructions of the University. The third party is required to hold the data confidentially and securely and will not use your data in any other way. Your data will only be kept for as long as necessary and will then be destroyed.

Who can see your data?

Your data is held securely within the University. Access is strictly controlled and staff receive training on data protection.

In addition to third parties helping us keep your data up to date, in order to boost functionality and efficiency, we may employ IT experts from outside of the University to aid with the development of our systems. They may have access to information which is necessary to complete the specific task for which they are appointed. These experts will provide their services in accordance with the strict instructions of the University. In particular they must respect confidentiality and to the extent they do need to temporarily hold any data, that data must be held securely, strictly used only for the agreed purpose, kept for only as long as necessary and then destroyed.

If you have registered for Pittsburgh Alumni Online, you can select what personal information will appear in your profile. Other members will see this profile through the 'find a friend' directory. You can choose if you wish to receive messages from other members who visit your profile. Your email address will not appear as part of this messaging service.
We also facilitate communications between individual alumni, but in doing so we do not release personal contact details without prior permission.

We will not sell or share your data to third parties for their commercial use.

**Graduate surveys by third parties**

Sometimes the University is requested to share graduates' contact information with third parties who are facilitating alumni surveys, which feed into university surveys and rankings.

When it is necessary to share your contact details with these third parties, you will be given prior notice by the University and the option to opt out of the survey when you are first contacted.

**Communications**

We will from time to time communicate with you by email, post and telephone to pursue the purposes mentioned above. In particular, we regularly communicate with people for the following purposes:

- share news about the University (including its research and services) and our alumni (including promotion of discounts and services for alumni)
- invite you to events and reunions
- invite you to support our fundraising activity
- invite you to volunteer for the University. This includes providing advice and guidance to students and University representatives and giving support to students during their time at University and in their career.

If the telephone number we have for you is registered we would only contact you on that number for administrative purposes unless you have given us permission to contact you on this number for other purposes. If you have opted not to receive communications from us we will follow your wishes.

**Sharing your data involving other countries**

Sometimes to achieve the purposes for which we are processing your personal data we may need to share your personal data with other organizations based within the European Union or if outside the European Union based in countries that have comparable levels of protection.

When it is necessary to share your data with organizations outside of the European Union, we will ensure that there are appropriate safeguards in place.
Retention

We see being a member of the University and part of the alumni, donor, or friend community as a lifelong relationship. Generally, the University will look to retain your personal data until you ask us to remove it from our records. We will routinely remind you of your right to have us remove your personal data.

If you decide that you no longer wish to receive communication from the University please be aware that we still need to retain a minimal amount of personal data so that we can keep a record that you have asked us not to contact you.

If you are not a member of the University alumni, donor, or friend community, any personal data held will be deleted should you not respond to our attempts to contact you, or should you state that you have no interest in forming a relationship with the University.

Legal basis for processing your data under GDPR

GDPR is a new law and it has not yet been applied to circumstances similar in context to our relationship with alumni, donors, and friends. The extent of lawful grounds for processing data has yet to be fully understood. As legal views mature, the University may change its views on its legal basis for processing.

The University will sometimes process your data based upon your consent.

The University has made a commitment to students, as lifetime members of the University, to provide services and activities for alumni. Therefore, the University will also be processing data often on the basis that it is necessary to enable it to meet its contractual commitments to alumni.

The University believes that by supporting University alumni and other development activities it is conducting something in the public interest. In particular, it is supporting the University’s charitable object of education and the benefits to society that flow from that.

Finally, the University believes that its activities are necessary for the purposes of the legitimate interest of the University and other third parties. These interests are not overridden by the interests and fundamental rights or the freedoms of the data subjects concerned. Legitimate interests of the University and third parties focus around supporting educational activities and ongoing developmental activities for University alumni and others.

It is recognized that some of the above grounds will overlap and that the University could rely on multiple grounds justifying its lawful processing.
Your Rights With Regards to Your Personal Data

You have the following rights concerning the processing of your personal data:

- **Right of access**: You have the right to request a copy of the personal data that we hold about you.

- **Right of rectification**: You have the right to correct personal data that we hold about you that is inaccurate or incomplete.

- **Right to be forgotten**: In certain circumstances, you have the right to request that the personal data we hold about you be erased from our records.

- **Right to restriction of processing**: Where certain conditions apply, you have the right to restrict processing of your personal data.

- **Right of portability**: You have the right to request that personal data we hold about you be transferred to another organization.

- **Right to object**: You have the right to object to certain types of processing of your personal data, such as direct marketing (to the extent applicable).

- **Right to judicial review**: In the event that we refuse a request under rights of access, we will provide you with a reason as to why. Individuals in the EU have the right to complain as outlined in "Further Information and Guidance" section below.

**Further information and guidance**

The University has established a dedicated email address for any questions or concerns you may have about the EU GDPR.

Please contact gdpr@pitt.edu if:

- You object to us using your personal data for marketing purposes, e.g., to send you information about university events. We will stop using your personal data for marketing purposes if you tell us not to.

- You would like us to update the personal data we hold about you.

- You would prefer that certain information be kept confidential.

If you believe that we have not acted properly when using your personal data, you may also contact gdpr@pitt.edu.