

# ASU Global Foundation UK Limited Privacy Notice

## Who we are

ASU Global Foundation UK Limited (ASUF-UK) is committed to protecting your personal data and privacy in accordance with applicable UK data protection laws, including the Data Protection Act 2018 and the UK General Data Protection Regulation.

ASUF-UK is a charitable company limited by guarantee that is registered in England and Wales with registered charity number 1201385. Our registered office is at 66 Lincoln's Inn Fields, London WC2A 3LH.

ASUF-UK is the “controller” of your personal data. Under data protection law, this is the organisation that determines when, why and how to process personal data and is responsible for establishing data protection practices and policies in line with the requirements of UK data protection law.

This Privacy Notice explains how we collect, use and share your personal information and the rights you have in relation to the personal data we hold about you.

## How we collect your information

### Information you provide

You may provide us with your personal data, for example by:

- submitting an enquiry;
- making a donation;
- being involved or participating in an initiative which is run or managed by ASUF-UK;
- responding to an invitation or attending an ASUF-UK or ASUF-UK chapter hosted event;
- communicating with us by post, 1:1 meetings, telephone or by email;
- signing-up to receive our updates / communications; and
- executing a letter of intent, gift deed, gift aid form or other gift documentation

### Information from other sources

We may collect technical information about you from your use of our website through the use of cookies and analytics. On occasion, we may also collect additional information from public sources. Please see the section below entitled ‘Analysis and research of our supporters and potential supporters’ for further information about this.

## The types of information we collect

The main types of personal data which we may collect about you, where relevant, are: your name, postal address, telephone number and email address, and records of the communications and interactions we have had with you.

## The basis for processing your information and how we use it

### 1. Legitimate interests

We may process your personal data because it is necessary for our or a third party’s legitimate interests. Our legitimate interests include the operation of ASUF-UK in accordance with our charitable objects. This will always be weighed against your rights, interests and expectations. Examples of where we process personal data in accordance with our legitimate interests include:

- carrying out our fundraising activities;
- processing your donation or Gift Aid declaration;
- organising and managing our events;
- corresponding with you about our charitable activities and services;
- processing technical information about your use of our website;
- processing enquiries, complaints and analysing our charitable services;

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- carrying out analysis and research of donors or potential patrons to gain a better understanding of our supporters and raise funds for our charitable purposes more effectively and efficiently (on which, see the section below entitled 'Analysis and research of our supporters and potential supporters'); and
- carrying out due diligence in advance of soliciting or accepting major donations.

### 2. Performance of a contract

We may process your personal data in order to perform our obligations under our contract with you, or to take steps at your request prior to entering into such a contract. Examples of when we would process personal data in this regard include:

- dealing with your enquiries and requests in relation to your current, prospective or historic donation;
- processing the payment of your donation;
- communicating with you about your donation; and
- administering and managing payments.

### 3. Legal obligations

We may process your personal data to comply with our legal and regulatory obligations. In this respect, we may use your personal data to comply with subject access requests and tax legislation; for the prevention and detection of crime; and in order to assist the police and other competent authorities with investigations.

### 4. Consent

In some circumstances, we may seek your specific consent to process your personal data:

For example:

- if we wish to use your name, likeness or an attributed quote on our website, in ASUK-UK related newsletters or in any materials promoting our activities

If you have given your consent and you wish to withdraw it, please contact us using the contact details below. Please note that where our processing of your personal data does not rely on your consent, we may not be able to fulfil your request.

### **Analysis and research of our supporters and potential supporters**

We use tools, including information segmentation and profiling, to help us build a picture of our donors and potential donors, in order to target our resources more effectively and improve the services we provide.

When building a profile, we may use donation history, geographic and other information you have provided to us, in order to better understand you, your interests and preferences.

On occasion, we may collect publicly available information to create a profile of you, your interests and preferences, so we can contact you in the most appropriate way and with the most relevant information.

### **Sharing your information with others**

Your information may, for the purposes set out in this Privacy Notice and relying on the bases for processing set out above, be shared with certain third parties including:

- Our employees, trustees, agents and contractors where there is a legitimate reason for their receiving the information;
- Third party consultants, contractors or other service providers who may access your personal information when providing services to us (such as IT support services and third party payment providers);
- Other professional advisers, such as our auditors and legal advisers, where it is necessary for us to obtain their advice and assistance;
- Other connected entities – e.g. the Arizona State University Foundation (see below); and

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- Where we are legally required to do so [for example by a court, government body, law enforcement agency or other authority of competent jurisdiction (for example HM Revenue and Customs and the Charity Commission)].

### **International data transfers**

We may transfer personal data within the European Economic Area (“EEA”), to the extent required for business management purposes. There is an adequacy decision in respect to the EEA, which means that the EEA is deemed to provide an adequate level of protection for your personal data, of a comparable level to the UK.

We may also share your personal data with the Arizona State University Foundation (“ASUF”) and other related entities in the USA. There is no adequacy decision in respect of the USA at present. However, to ensure that your personal data does receive an adequate level of protection, any such transfers are subject to appropriate contractual safeguards and arrangements in accordance with UK data protection requirements.

### **How long your information is kept**

We will retain your data for as long as is necessary:

- to manage any payments / donations and comply with regulatory requirements in this regard;
- to protect our legal interests and comply with our obligations (for example where required by relevant legal authorities);
- to analyse data to inform our policies/processes; and
- for our record-keeping and archival activities.

### **What are your rights**

You have the right to:

- request access to, and copies of, the personal data that we hold about you;
- require us to correct the personal data we hold about you if it is incorrect;
- require us to erase your personal data, in certain circumstances;
- require us to restrict our data processing activities, in certain circumstances;
- receive the personal data we hold about you, which you provided to us, in a reasonable format specified by you, including for transmitting it to another data controller; and
- object, on grounds relating to your situation, to any of our data processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

You can find out more about your rights under data protection legislation on the Information Commissioner’s Office (ICO) website ([www.ico.org.uk](http://www.ico.org.uk)).

If you are not satisfied with how we are processing your personal data, you can make a complaint to the ICO. The ICO does recommend you seek to resolve any issues with us as the controller of your personal data before any referral.

### **How to contact us**

If you want to request information about this Privacy Notice or how we process your personal data, or if you wish to exercise any of your rights under data protection law, you can email us at [info@asufoundation.org.uk](mailto:info@asufoundation.org.uk).

*Last updated: September 26, 2023*