

## Student Data Privacy Statement

**Last Revised:** 21<sup>st</sup> May 2018

### Introduction

West London Students' Union ("UWLSU", "we", "our" or "us") promises to respect any personal data you share with us, or that we get from other organisations and keep it safe. We aim to be clear when we collect your data and not do anything you would not reasonably expect.

Developing a better understanding of our members through your personal data allows us make better decisions, communicate more efficiently and, ultimately, helps us to reach our goal of having a positive impact with every UWL student as defined in our Charitable Objectives.

We collect information in the following ways:

#### When you become a MEMBER

Each year that you enrol on a University of West London course you automatically become a member of the University of West London Students' Union, unless you opt out during enrolment. The University of West London shares a register of members with us which includes information about you and your course. When the University gives us this data we become responsible for it and will use this as our core central record of your membership. We may also use it when undertaking work for UWL that also fits within our core charitable purpose.

#### When you give it to us DIRECTLY

You may give us your information in order to sign up to a student group, for one of our events, undertake research activities, purchase our products, attend a trip with one of our partners or communicate with us. When you give us this information we take responsibility for looking after it and we will cross reference this data against our register of members.

If you become involved in the governance of the union, by running for election or becoming a Trustee, we may ask for additional information to comply with our legal obligations for charity, company, education and immigration law.

You may also give us your information when you use our Advice Service. This data may include special categories data which is data related to your health or sexual life and we have particular obligations to keep this secure. There is an additional policy available that describes the additional information you may give by consent which will be described to you when you take part in that service.

#### When you give it to us INDIRECTLY

Your information may be shared with us by independent organisations, for the UWL or event partners. These independent third parties will only do so when you have indicated that you have given consent to share this data with us. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

#### When you give permission to OTHER ORGANISATIONS to share

We may combine information you provide to us with information available from external sources in order to gain a better understanding of our members to improve our communication methods, products and services.

The information we get from other organisations may depend on your privacy settings or the responses you give, so you should regularly check them. This information comes from the following sources:

#### **Third party organisations**

You may have provided permission for a company or other organisation to share your data with third parties such as the Students' Union. This could be when you buy a product or service, register for an online competition or sign up with a comparison site.

## **Social Media**

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.

## **Information available publicly**

This may include information found in places such as Companies House and information that has been published in articles/ newspapers.

## **When we collect it as you use our WEBSITES**

Like most websites, we use “cookies” to help us make our site – and the way you use it – better. Cookies mean that a website will remember you. They’re small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

In addition, the type of device you’re using to access our website and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have and what operating system you’re using. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

## **When you BUY A PRODUCT from us**

To place an order with us online, registration is required. At the point of registration, we request certain information including your name, delivery address and email address. This information is required to enable us to process your order and notify you of its progress. Once an order has been placed, we may contact you by email to confirm your order details and again once your order has been accepted and despatched. Should we need to contact you for any reason regarding your order, we will use the email address registered to your account, or the telephone number where provided. We also ask if you will provide us with your Student ID number when you shop in store, this allows us to track the products you purchase, provide better customer service standards and develop the product range we offer to students. In store you are under no obligation to provide us with this information.

## **What personal data we collect and how we use it**

The type and quantity of information we collect and how we use it depends on why you are providing it.

### **Our Members**

If you are one of our members, the University, in response to their obligations to you, provide us with a set of key information you provided at enrolment. When you use our services or participate in one of our activities we will use this information to provide the best possible standards of administration and communication. The information provided to the Students’ Union and the data sharing agreement can be [accessed here](#) for further information but in summary it includes:

- Student ID
- Name
- Date of birth
- Gender
- Institution Email
- Alternative email
- Nationality
- Hall of residence
- Address (including domicile country)
- Phone number

### **Academic information**

- Mode of Study
- School

- Course
- Start Date
- End Date
- Library card information
- Fee status
- Erasmus or placement data

Special categories:

- Ethnicity

In addition when you attend an event, join a student group or use one of our services we may ask for additional information such as:

- Your date of birth to ensure compliance with age-related laws
- Your bank details to facilitate payments
- Information relating to your health if you are taking part in a high risk activity
- Any disabilities so that we can provide assistance where needed

We will mainly use your data to:

- Provide you with the services, products or information you asked for
- Fulfil our Charitable Purposes of representing students, providing welfare services for them and creating development opportunities
- Administer your membership
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted
- Understand how we can improve our services, products or information
- Register your membership with National Governing Bodies

### **Building profiles of members and targeting communications**

We use profiling and screening techniques to ensure communications are relevant and timely, and to provide an improved experience for our members. Profiling also allows us to target our resources effectively which members consistently tell us is a key priority for them. We do this because it allows us to understand the background of the people who study at the University and helps us to deliver appropriate services and information to members who need it. For the Advice Service we may also monitor risk of withdrawal from academic services or harm.

When building a profile we may analyse geographic, course information, demographic and other information relating to you in order to better understand your interests and preferences in order to contact you with the most relevant communications. Your data would only ever be analysed or profiled through encrypted and protected data processes, which only ever identifies broad statistics. In doing this, we may use additional information from third party sources when it is available.

### **How we keep your data safe and who has access**

Personal data collected and processed by us may be shared with Students' Union employees and volunteers and under strictly controlled conditions the following groups where necessary:

- Contractors
- Advisors
- Agents
- Service provider partners

When we allow access to your information, we will always have complete control of what they see, what they are allowed to do with it and how long they can see it. We do not sell or share your personal information for other organisations to use.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

Some of our suppliers may run their operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors. We will only ever share your data in other circumstances if we have your explicit and informed consent.

### **Lawful basis for processing your data**

All processing is undertaken in accordance with the requirements of data protection legislation. The lawful basis for processing your member of the Students Union is that it is the SU's legitimate interests to fulfil the charitable purposes outlined in its Articles of Association and provide you with events and services that will enhance your experience while you are University. Any marketing to you is undertaken on the basis of consent.

A list of the data we hold and its lawful basis is contained in the appendix below.

With regard to any special categories data the lawful basis is set out below:

- your ethnicity that is provided by the University as part of the information provided at enrolment to enable us to monitor your engagement this is processed on the basis that it is the UWLSU legitimate interests to monitor the effectiveness of its services and that you consented to this at enrolment
- information on your health or disability when you participate in events is processed on the basis of the legal obligation to ensure health and safety and also its obligations under social protection law
- your health data that you may provide to the Advice Service is provided on the basis of your consent

### **Marketing & Communications Preferences**

#### **Membership Communications**

As a member we believe you have a legitimate interest in hearing from us about the products and services we offer, what we're doing to represent or campaign for you and opportunities that might be of interest to you. Occasionally, we may include information from partner organisations, our own social enterprises or organisations who support us in these communications.

#### Direct Marketing

As a charity we need to fundraise to provide the services we offer to University of West London students. We will send marketing material to you where you have told us that we can. We do not sell or share personal details to third parties for the purposes of marketing.

#### Controlling what you want to hear about

We make it easy for you to tell us how you want us to communicate, in a way that suits you. Our forms have clear marketing preference questions and we include information on how to opt out when we send you marketing. If you don't want to hear from us, that's fine. Just let us know when you provide your data or contact us on [sudataprotection@uwl.ac.uk](mailto:sudataprotection@uwl.ac.uk).

#### Keeping your information up to date

We mostly use the record of members provided by the University of West London to maintain accurate data about you as described above. We really appreciate it if you let us know if your contact details change.

### **Understanding the detail of our data security measures**

When we process your data we will have already carefully assessed the lawful justification for doing so, the parameters in which the data is processed, the length of time the data is held for, the secure storage of your data and undertaken impact assessments to ensure your rights are delivered. An overview of this analysis can be requested from us by emailing [sudataprotection@uwl.ac.uk](mailto:sudataprotection@uwl.ac.uk).

The Students' Union operates a Data Protection and Information Security Policy. All employees and volunteers handling data are required to undertake general data protection training and third parties handling data are required to provide a contract which meets the requirements of the Information Commissioner's Office.

The Students' Union does not store any sensitive card data on our systems following online transactions.

Your right to know what data we hold about you, make changes or ask us to stop using your data

You have a right to ask us to stop processing your personal data, and if it's not necessary for the purpose you provided it to us for (e.g. processing your membership or registering you for an event) we will do so. Contact us on [sudataprotection@uwl.ac.uk](mailto:sudataprotection@uwl.ac.uk) if you have any concerns.

You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

Where we hold your data based on consent, you have a right to ask us to erase this data.

If you want to access your information, you must complete the contact us with a description of the information you want to see and the required proof of your identity by post to the West London Students' Union, North Building, St Mary's Rd, London W5 5RF. We do not accept these requests by email so we can ensure that we only provide personal data to the right person.

### **Changes to this statement**

We may change this Privacy Statement from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our Website or by contacting you directly.

If you have any questions, comments or suggestions, please let us know by contacting [sudataprotection@uwl.ac.uk](mailto:sudataprotection@uwl.ac.uk).

Appendix A

<b>Data collected from UWL and passed to UWLSU</b>	<b>Lawful Basis</b>
Advice Service: A student may agree for us to receive information about university services they have used	Consent
Elections – eligibility to vote	Legal obligation – compliance with 1994 Education Act
Members Database	Legal obligation – membership database for compliance with Companies Act Legitimate interest – all aspects of achieving charitable purpose
Database codes	Legitimate interest – ability to interpret members database to achieve all aspects of achieving charitable purpose including providing opportunities for development to students through activities
Students eligible for completion of NSS	Legitimate interest – representing students at UWL
Anonymised retention and attainment data – UWLSU send UWL student numbers of people engaged in our different activity, they remove all identifying data (student number) and send it back with information about whether they've withdrawn, the SU activity they've engaged in, and demographic information.	Legitimate interest – representing students at UWL, providing opportunities for development, helping identify trends in student demographics requiring welfare support
Course Based Activities: If students attended SU led CBAs and the SU are not there to track them, course leaders will send us the student numbers of those who attended.	Legitimate interest - representing students at UWL, providing opportunities for development.
Barcode scanning data: Sent from students attending UWL led events	Legitimate interest – representing students at UWL, providing opportunities for development

<b>Data collected from UWLSU and passed to UWL</b>	<b>Lawful Basis</b>
Advice: We may share personal and case details with the university but only at the explicit consent of the student on a case by case basis.	Consent
Election candidates: Election candidates are sent to student records to confirm eligibility	Consent – candidates must sign to agree that they are willing to act as directors Legal obligation – compliance with 1994 Education Act, Immigration Law, Company and Charity law Criminal offence – if the candidate cannot hold a directorship or trusteeship
Pay roll: We send all staff information including personal details and salary/pay/hours to HR and Payroll to process payment	Legal obligation
Advice Service: If there are safeguarding concerns, students personal information and the nature of the safeguarding risk will be shared with student services.	Legal obligation Vital purpose
Engagement data:	Legitimate interest – supporting the Welfare of students at UWL

Appendix A

Student numbers of students who engage in our different activities.	
Course reps: Course Rep and School Rep names, student numbers, course and year level for each school to school administrators and academic staff	Legitimate interest – representing students at UWL
Incidents on trips/activities: If there is a serious injury/death on a SU-led trip or activity, we would share the personal details with the university	Legitimate interest – supporting the Welfare of students at UWL Vital purpose
First Aid Incidents: First Aid Trained staff have to use the University system to log First Aid incidents which will include personal data	Legitimate interest – supporting the Welfare of students at UWL Vital purpose

<b>Data collected from UWLSU and not shared outside organisation</b>	<b>Lawful Basis</b>
Advice: Personal and case details with explicit consent of the student on a case by case basis.	Consent Legal obligation Vital purpose
Activities: Personal contact information and health information for members on Trips	Consent Legal obligation Vital purpose
All services: Survey results on service performance and satisfaction	Consent
Directors / Trustee details: Information required to comply with Company and Charity legislation	Legal obligation
Engagement: Barcode data	Legitimate interest – all aspects of achieving charitable purpose
All services: Report and Dashboards include anonymised data that may include information split into demographics to show trends of service usage or need	Legitimate interest – all aspects of achieving charitable purpose