UNIVERSITY OF WEST LONDON
STUDENTS' UNION

UWLSU Privacy Notice

Approved by:	Trustee Board
Approved on:	15 April 2025
Date Implemented:	16 April 2025
Responsibility:	Governance Officer

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 to 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 (UWLSU), 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 are a **COMMERCIAL CLIENT**
You may give us your information (including your personal information or bank details) to, e.g. sign up for the gym or purchase a product. We will use your data to administer the services to you.

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 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.

Some of our data processors operate outside the UK. While these processors may not fall under the same data protection regulations as those within the UK, we are committed to ensuring they meet a sufficient standard of protection that aligns with UK data protection legislation.

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.

Retail, EPOS and E-commerce Services
When you purchase goods or services from the Students' Union through our cafés, bars, retail outlets, online ordering platforms, or other commercial services, we may collect and process certain personal information to provide and manage these services.
This information may include:

- Name
- Email address
- Transaction details and purchase history
- Order details and fulfilment information
- Account information where you create an online account
- Loyalty programme information and points balances
- Customer preferences and interaction history with our services

Where customers choose to receive digital receipts, sign up to loyalty schemes, create customer accounts, or place orders online, we may collect and store the information necessary to operate these services.
We use third-party EPOS and e-commerce platforms to manage retail transactions. These systems process payments and may store limited customer information on our behalf to provide services such as digital receipts, order management, loyalty programmes, customer accounts, and reporting. Our current provider for these services is **Square**.
Payment card details are processed securely by the payment processor and are not stored directly by the Students' Union.
Where supported by the payment platform, we may also receive aggregated or transaction-level information associated with a customer's payment method (for example, spending patterns or purchasing behaviour) where this information is made available to us through the platform. We use this information to understand customer engagement, improve our services, and monitor the performance of our commercial operations.
We may use contact details such as email addresses to send marketing communications about Students' Union offers, promotions, and services where you have consented to receive such communications. You can opt out of marketing communications at any time.
We process this information under the following lawful bases:

- **Contract** – to process purchases, provide goods and services, and manage customer accounts or loyalty programmes.
- **Legitimate interests** – to operate and improve our retail services, analyse purchasing trends, monitor spending patterns, and manage commercial performance.
- **Consent** – where you have opted in to receive marketing communications.

Personal data relating to transactions and accounts will be retained only for as long as necessary to fulfil the purposes described above and to comply with financial, tax, and regulatory requirements.

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 by emailing sudataprotection@uwl.ac.uk 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

Commercial Clients

- Name
- Email address
- Bank details

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 can 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 a suitable level of protection for the rights and freedoms of the data subjects in relation to the processing of personal data. 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

Data Protection Laws require that we meet certain conditions before we are allowed to use your data This includes having a "legal basis" for processing it.

The legal bases for us to process your personal data are:

Legal Obligation: the processing is necessary to comply with the law (not including contractual obligations).

Consent: We may ask you to provide us with a personal or special category data as detailed above which we will agree only to process with your express consent.

Contract: The processing of your personal data may be necessary in relation to the contract we have entered into with you to provide the Unions services to you.

Vital Interest: It is very unlikely but, we may need to processing personal data in order to protect someone's life or in an emergency situation.

Public interest: The processing of your personal data may be necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

Legitimate interests: The processing of your personal data may be necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or by fundamental rights and freedoms which require protection of personal data. It may be within our legitimate interests to collect your personal data to enable us to manage certain operations of the Union effectively. All processing is undertaken in accordance with the requirements of data protection legislation.

A list of the data we hold, and its lawful basis is contained in Appendix A.

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

- The University provide us with information about your ethnicity at enrolment which enables us to monitor your engagement in activities. This is processed on the basis of **consent** as you gave permission for this at the time of enrolment

- information on your health or disability when you participate in events is processed on the basis of the **legal obligation** to ensure the health and safety of members.

- The 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 consented for us to do so. 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 at uwl.su@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.

The Students' Union operates a Data Protection 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. 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 can contact the Students' Union, in person by post, by telephone, by email or via one of our social media platforms. Contact details for all of these are listed below.

When you tell us what information you want to access, we will be required to verify your identity before we are able to disclose this, and this must be done in person.

Addresses

University of West London Students Union
St Mary's Road
Ealing W5 5RF

Paragon Building
Boston Manor Road
Brentford, TW8 9GA

10th Floor, Fountain House
2 Queens Walk
Reading, RG1 7QF

Century House
61-63 Uxbridge Road
Ealing, W5 5SA

Ruskin College
Ruskin Hall
Dunstan Road Old
Headington
Oxford
OX3 9BZ

Telephone
0208 231 2276

Email
sudataprotection@uwl.ac.uk

Social Media
Twitter @uwl_su
Facebook @westlondonsu

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

Appendix A: Details of the data processed by UWLSU

Data collected from UWL and passed to UWLSU	Lawful Basis
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
Database codes	Legal obligation – membership database for compliance with Companies Act
Students eligible for completion of NSS	Legitimate interest – representing students at UWL
Data on retention and attainment for UWLSU to track engagement against this. This data is anonymised.	Anonymised data is not subject to GDPR
Course Based Activities: If students attend SU led CBAs and the SU are not there to track them, course leaders will send us the student numbers of those who attended.	Consent – by allowing us to have your student number you are consenting to us processing your personal data
Barcode scanning data: Sent from students attending UWL led events	Consent – by allowing us to have your student number you are consenting to us processing your personal data

Data collected from UWLSU and passed to UWL	Lawful Basis
We may share advice case details with the university but only at the explicit consent of the student on a case by case basis.	Consent
Details of election candidates are sent to student records to confirm eligibility	Consent – candidates must sign to agree that they are willing to act as directors
We send all staff information including personal details and salary/pay/hours to UWL HR and Payroll to process payment	Legal obligation
If the SU have safeguarding concerns about a student they're personal information and the nature of the safeguarding risk will be shared with student services.	Legitimate Interest Special Category - Necessary for the provision of health or social care treatment

Engagement data: Student numbers of students who engage in our different activities.	Consent – by allowing us to have your student number you are consenting to us processing your personal data
Course reps: Course Rep and School Rep names, student numbers, course and year level for each school to school administrators and academic staff	Contract – Contract with individual
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 Special Category - Necessary for the provision of health or social care treatment
First Aid Incidents: First Aid Trained staff must use the University system to log First Aid incidents which will include personal data	Legal Obligation
Data collected from UWLSU and not shared outside organisation	**Lawful Basis**
Advice: Personal and case details with explicit consent of the student on a case by case basis.	Consent
Activities: Personal contact information and health information for members on Trips	Consent
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	Consent – by allowing us to have your student number you are consenting to us processing your personal data
All services: Report and Dashboards include anonymised data that may include information split into demographics to show trends of service usage or need	Anonymised data is not subject to GDPR
Collected by UWLSU	**Consent/Legal Obligation**
Commercial activities: Bank details provided directly to the service provider software for payment purposes	Consent Legal obligation – to enable us to provide you with and charge for the service
Sports Centre: Bank details provided directly to the service provider software for payment purposes	Consent Legal obligation - to enable us to provide you with and charge for the service
Activity / Purpose Retail sales, café/bar transactions, EPOS services, online ordering and e-commerce, loyalty schemes, and customer accounts.	Contract – to process purchases, provide goods and services, manage online orders, and administer loyalty schemes or customer accounts.

Personal Data Collected Name, email address, transaction details and purchase history, order information, loyalty scheme details (including points balance and participation), account information for online ordering or customer accounts, and customer interaction history with retail services. Where available through the payment platform, we may also receive transaction-related insights associated with a customer's payment method (for example, spending patterns or purchasing behaviour). **How Data Is Collected** Information provided by customers at the point of purchase, through online ordering systems, when requesting digital receipts, when signing up to loyalty schemes, or when creating customer accounts. Transaction data may also be generated through the payment platform when purchases are made. **Data Processors / Third Parties** Retail EPOS, payment processing, and e-commerce platform providers (currently **Square**) who process transaction and customer data on behalf of the Students' Union. **Retention** Transaction and account information is retained for as long as necessary to manage retail operations, support financial record keeping, and comply with legal and regulatory obligations.	Legitimate interests – to operate and improve retail and hospitality services, monitor commercial performance, analyse purchasing trends, and understand customer engagement. Consent – where customers have opted in to receive marketing communications.