

# **Privacy Policy: Data Protection & Information Security Policy**

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# Privacy Policy: Data Protection & Information Security Policy

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## Introduction

Preservation of your privacy is important to the University of South Wales Students' Union ("the Union", "USWSU", "we", "us", "our") and we are committed to letting you know how we use your personal information and to making only responsible use of your data. We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect.

The Union recognises the General Data Protection Regulations and the Privacy of Electronic Communications Regulations as the primary statutory responsibilities relating to data handling and processing.

This privacy notice tells you what to expect when USWSU collects personal information. It applies to information we collect about:

- Our members, officers and volunteers
- Users of our websites
- People who use our services
- People who give us feedback, make suggestions, complete questionnaires, polls or make complaints
- Suppliers and agents
- Donors and supporters
- Job applicants and our current and former employees

## Where we collect information about you from

We collect information in the following ways:

### When you become a MEMBER

When you enrol on a University of South Wales course you automatically become a member of the University of South Wales Students' Union, unless you opt out during enrolment. The University of South Wales shares this information with us in accordance with our [data sharing agreement](#). The agreement permits the transfer of all or part of your personal information from the University to the Students' Union. When the University gives us this data we become responsible for it and will use this as our core central record of your membership.

### When you give it us DIRECTLY

You may give us your information in order to sign up to a student group, attend one of our events, purchase our products, apply for a job with us, use one of our services

or communicate with us. We will only collect the personal data that we need and will take responsibility for looking after this information.

### When you give it to us INDIRECTLY

Your information may be shared with us by independent organisations, for example NUS Extra, event partners, or our own trading companies. 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

Cookies are used on this website for functional, analytical and advertising purposes. A cookie is a small piece of information which is sent to your browser and stored on your computer's hard drive. Cookies do not damage your computer, and by themselves cannot be used to discover the identity of the user.

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 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, what operating system you're using, what your device settings are, and why a crash has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

You can set your browser to notify you when you receive a cookie; and you may block cookies by adjusting the settings on your browser. Please note that if you restrict all cookies you may not be able to access all or parts of our website. Unless you have configured your browser to refuse cookies, our system will issue cookies as soon you visit our websites.

If cookies are used they will only be used to assist the purposes set out in this privacy policy, but cookies will not be used if we do not consider them to be necessary.

You can find out more about [how we use cookies here](#).

## 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, 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, 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.

## Data Protection Officer

The Data Protection Officer is the Marketing Communications Manager at the Union. The Data Protection Officer is responsible for:

- Informing and advising the organisation and its employees about their obligations to comply with the GDPR and other data protection laws.
- Monitoring compliance with the GDPR and other data protection laws, including managing internal data protection activities and advise on data protection impact assessments.

- To be the first point of contact for supervisory authorities and for individuals whose data is processed (students, employees, customers etc.).

The Data Protection Officer is delegated authority by the Chief Executive to carry out their role with the resources required to be effective in the protection and security of the individual data the organisation handles.

The Data Protection Officer can be contacted via email  
studunion@southwales.ac.uk.

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

When using the term “personal data” in our Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold.

Your personal data may include for example your name, your contact details, or information on how you use our website or how you interact with us.

### **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 use this information to provide the best possible standards of administration and communication.

Sharing data in this way enables the University to fulfil its duty to provide a Students' Union and to meet obligations under the Education Act 1994, as well as observing the legitimate interests of students to be offered the services provided by the SU, which include representation functions.

The University of South Wales provides us with the following student information:

- Student names
- Student University of South Wales email addresses
- Date of birth
- Gender
- Nationality
- Country of domicile
- Fee status
- Campus of study
- Year of study (1/2/3/4/5)
- Level of study (UG/PGR/PGT etc)
- Student number
- School
- Faculty

- Programme Code
- Start Date
- End Date
- Student User ID
- Erasmus
- Placement (Yes/No)

The personal data collected here enables us to carry out our responsibilities as a Students' Union and enables us to ensure you have the required permissions to vote for elected student representatives. The data sharing agreement can be [accessed here](#) for further information.

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
- 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 for example British Universities and Colleges Sport (BUCS)

Occasionally the SU will share pertinent data with the University. This would be for improving your welfare, educational experience, the experience of future students or for academic research purposes.

## **What information do student representatives or group committee members have access to?**

Certain categories of students will have access to some limited personal data:

- Course or Student Voice Representatives
- Group Committee Members (such as sport captains or society presidents)
- Full-time Officers

When you register to join a student group or network through our website or to attend one of their events, you consent to the relevant committee members

(President, Captain or Chair) holding limited personal data (name, email address). This is under a legitimate interest for them to achieve their objectives of administering the membership you have requested. Whilst registering for membership of one of these groups you may be asked to provide other personal data to enable them to perform their duties. They will not collect information beyond what is needed.

Under some limited circumstances they may need to collect additional personal data, such as emergency contact or medical information to meet their requirements to perform a service you have requested, for example where you have requested membership for a group or event that involves high risk activity. This is to ensure that they can meet their obligations to comply with health and safety, and this data will not be used for any other purpose.

USWSU provide guidance to Officers, Student Representatives and Committee Members to ensure they handle your data in compliance with UK law.

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

Where you have given us consent 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.

When building a profile we may analyse geographic, 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**

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 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.

As a member led charitable organisation it is important that our elected representatives are publicly accountable to members. We publish the names of all elected representatives alongside their assigned officer @southwales.ac.uk email addresses, we may also publish University email addresses where appropriate to the individual and their role. Where University student email addresses (@students.southwales.ac.uk) are published the individual will be entitled to opt-out of this through means provided or contacting the Students' Union Data Protection Officer.

## **How long do we hold your data for?**

We will only hold your personal data as long as is strictly necessary. Where this relates to your membership of the Students' Union (for example, registration with teams, clubs and/or societies), our general retention policy is to hold this data for one year after the end of the academic year in which the data was collected or shared. This ensures that we can maintain an accurate record for a sufficient time period to administer your membership correctly or respond to any outstanding queries or complaints. There are some limited circumstances in which a different retention policy will be applied to enable us to comply with relevant legislation requirements, this includes:

- 7 years for information held in relation to any assignment of work you have undertaken with USWSU and the processing of payroll for similar assignments with the University.



- 7 years for information held in relation to any employment you have undertaken with USWSU.
- 7 years for any information held in relation to financial services, including purchases made through our shop. This is to ensure we can meet our obligations under the Companies Act.
- 7 years following the completion of a term of office as a Trustee of the Union.
- 6 years after the last action on a case for any information relating to student disciplinary proceedings and student case work.

## **Marketing and 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 you and opportunities that might be of interest to you. You may opt out of these communications at any time by clicking the unsubscribe link contained within the email.

### **Direct Marketing**

As a charity we need to fundraise to provide the services we offer to University of South Wales students. We may send marketing material to our members 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 01443 483500 or [studunion@southwales.ac.uk](mailto:studunion@southwales.ac.uk).

### **Keeping your information up to date**

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

## **Data breaches**

The Union shall adopt processes to detect data breaches including audits and other appropriate processes. Employees and volunteers must report data breaches to the Data Protection Officer within 24 hours. The Information Commissioner's Office shall

be notified within 72 hours of the breach where there is a risk to the rights and freedoms of individuals such as discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage. Where there is a high risk to the rights and freedoms of individuals they shall be notified directly also.

## **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 01443 483500 or [aled.bishop@southwales.ac.uk](mailto:aled.bishop@southwales.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.

If you want to access your information, you must submit a Subject Access Request to the Data Protection Officer with a description of the information you want to see and the required proof of your identity by post to the University of South Wales Students' Union, Forest Grove, Treforest, CF37 1UF. We do not accept these requests by email so we can ensure that we only provide personal data to the right person.

If you want to opt-out of all communications and data processing you will be required to surrender your membership to the Students' Union which will limit your access to activities and services. You can do this by writing to the Academic Registrar of the University. Once this right has been exercised, it will remain in force whilst the you are enrolled on your course (unless rescinded formally in writing). Students who exercise this right will receive an identification document, which will enable them to use all the services of the Union as agreed between the Union and the University, but they will not be able to participate in the democratic and decision-making processes of the Union, including its clubs and societies.

More information about your right not to be a member of the Students' Union can be found in Section 22(2)(c) of the [Code of Practice on the Operation of the Students' Union here](#).

If you have any questions please send these to [studunion@southwales.ac.uk](mailto:studunion@southwales.ac.uk), and for further information see the [Information Commissioner's guidance here](#).

## **Changes to this policy**

We may change this Privacy Policy 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 [studunion@southwales.ac.uk](mailto:studunion@southwales.ac.uk)

Links within our sites to other websites are not covered by this privacy policy.