

Hull University Union

STUDENTS DATA – PRIVACY NOTICE

What is the purpose of this document?

Hull University Union is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your membership relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all students who become members of Hull University Union.

Hull University Union is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former members of Hull University Union. This notice does not form part of any contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice (for example our general privacy notice which relates to use of our website and facilities) we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.

- Identity details such as, student number, date of birth, nationality, domicile, gender.
- Course details including, course name, subject, method of study, campus, faculty, school, year of course, whether you are an undergraduate, post graduate (taught) or post graduate (research) student.

How is your personal information collected?

We collect personal information about you when you register as a student at the University of Hull and become a member of Hull University Union. Hull University Union has a data sharing agreement with the University of Hull that clearly sets out what data is shared with us and how we can use the data to allow students to participate as a member.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. To allow you to participate in the range of activities available to you as a member of Hull University Union.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

Lawful bases for Processing

We need all the categories of information in the list above (see “the kind of information we hold about you”) primarily to allow us to provide our services to you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

These are our reasons for processing your information. However, please also see the section below (“Do we need your consent?”) which explains the limited circumstances in which we may seek your consent.

Situations in which we will use your personal information

The situations in which we will process your personal information are listed below:-

- Administration of clubs and societies.
- Marketing of services provided directly by Hull University Union. Students will be able to opt out from receiving these communications. Only approved third party suppliers will be allowed to communicate with our members and all their communications will have approval by Hull University Union before transmission.
- Conducting surveys to gain feedback on our services and activities.

- Administration of elections.
- Administration of referenda.
- Administration of student representation on University committees, panels, boards and other representative bodies.
- Verification of student identity.
- Communication with Sports Clubs, Societies and the University Sports and Fitness Centre.
- Administration of student awards.
- Administration of external speaker requests.
- Administration of Give it a Go trips and events.
- Administration of faculty and course representatives.
- Administration of volunteering opportunities and events.
- Administration of Advice Centre cases.
- Administration of HullStars
- Administration of HUU Homes
- Processing of cashless card payments.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Please note that we have a separate privacy policy which applies to data collected via use of our website, purchases of goods, services and events and use of our facilities. This can be found on our website.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to provide services available to you as a member, or we may be prevented from complying with our legal obligations.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the

following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with employment, which may apply to students who take up employment with us.
3. Where it is needed in the public interest.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

Examples of where we will use your particularly sensitive personal information are as follows:

- For students who take up employment, we will use sensitive information to comply with our obligations as an employer, for example in managing sickness absence or equal opportunities monitoring. This will be in accordance with our privacy notice for employees (which you will be directed to upon the commencement of your employment).
- In the course of providing the services of the Student Union Advice Centre it may be necessary to obtain and process sensitive personal data. Users of the Advice Centre are provided with specific information about this when accessing its services.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, such as in the case of accessing support from the Advice Centre, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Information about criminal convictions

In the normal course of your membership of Hull University Union we do not envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate (for example if relevant to services sought from the Advice Centre) and where we are legally able to do so.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the

law.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer your membership with us or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group. The following third-party service providers process personal information about you for the following purposes:

- Lincoln University Students Union – supplier of the Student Unions Management System that we use to administer some of the services provided to you as a member.
- StuRents – to administer tenancy contracts with landlords who we provide lettings services to through HUU Homes.
- University of Hull Sports and Fitness Centre – details on sports club memberships and roles such as president, secretary and treasurer.
- The University of Hull for matters relating to students studying at the University.
- Hull City Council – to support you in resolving relevant housing issues through HullStars.
- Support providers – referrals to relevant support agencies from the Advice Centre.
- Survey providers – to secure feedback from you on our services and activities through external providers.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or for system maintenance support and hosting of data.

What about other third parties?

We do not propose to share your personal information with other third parties, unless it should become necessary as a result of us adding to or developing our existing services. If this should occur, appropriate safeguards will be put in place and this policy will be updated.

Transferring information outside the EU

We do not currently transfer your personal information outside of the EU. If we propose to do so in the future then we may do so if there is an adequacy decision by the European Commission in respect of those countries (i.e. if the countries to which we transfer your data are deemed to provide an adequate level of protection for your personal information).

In the absence of an adequacy decision we will inform you of measures that we shall put in place to ensure that your personal information is treated by any such third parties in a way that is consistent with and which respects the EU and UK laws on data protection or, if we consider it necessary at that time, we may seek your explicit consent to the transfer.

We will also update this policy as required.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your membership with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the DPM (details below) in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the DPM. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection manager

We have appointed a Data Protection Manager (DPM) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPM. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Data Processing Manager:

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