



PRIVACY NOTICE

This Privacy Notice explains how Ulster University Students Union (UUSU) collects, uses and shares student personal data and explains students' rights in relation to the data that UUSU processes about current, past and potential future students.

UUSU is registered as a 'data controller' with the UK Information Commissioner's Office (ICO). The ICO is the independent supervisory authority set up to promote and oversee compliance with GDPR legislation. A copy of UUSU's ICO registration is available at: www.ico.org.uk.

Ulster University and UUSU have entered into a data sharing agreement that is aimed at making student life that little bit simpler. All Ulster University students are automatically members of UUSU so sharing your information helps the Union provide membership services to you and other students. The information shared includes; your name, date of birth, gender & nationality, your contact information such as email addresses and details about the course you are studying. Your information is transferred securely to UUSU and is used to pre-register you with The Students' Union. This will mean you won't need to re-enter this information when registering on the Students' Union website. This should make it easier for you when joining the sporting, cultural and extra-curricular activities provided, other online membership services and participate in Students' Union elections and student representation. You can tell Ulster University that you do not wish The Students' Union to have your data by opting out at enrolment. More details can be obtained via the Privacy Policy of the University.

Data Protection Officer: David Longstaff, CEO and Data Protection Officer, c/o UUSU, University of Ulster, Room 11H03, Jordanstown Campus, Shore Road, Newtownabbey BT37 0QB, email: d.longstaff@ulster.ac.uk

1. Purpose of processing personal data

UUSU processes data about you for various teaching, research and administrative purposes. The reasons for our processing of your information fall into two categories. Firstly, we process personal information so that we can effectively join you up to UUSU so that we can represent you and provide services, activities and opportunities for involvement and development. Examples of this activity include:

- Administration of Officer Elections;
- Administration of General Meetings and Referendum;
- Administration of committees, volunteering and representative opportunities;
- Administration of clubs, societies, student groups and other student opportunities;
- Managing clubs, societies and student groups memberships, accounts and records;
- Provision of Advice, Information and Guidance Services;
- Research and planning;
- Monitoring student engagement through appropriate demographics to assist in ensuring our services are relevant for all students;
- Managing the verification of ticket sales;
- To allow email communication between the Students' Union and its members.

Secondly, we use data to let our members, volunteers, partners and customers know about things happening at UUSU that we think will interest them. This could include topics such as:

- Fundraising
- Advertising, Marketing and Public Relations
- Campaigns
- Events and Activities taking place at the Union
- Opportunities for students

2. Lawful basis for processing data

UUSU will apply the following conditions for processing as appropriate:

- **Consent** – The individual has given consent to the processing for one or more specific purposes.
- **Necessary for performance of a contract or service** – the processing is necessary for the performance of a contract with the individual.
- **Legal obligation** – the processing is necessary for compliance with a legal obligation to which the data controller is subject.
- **Vital interests** – The processing is necessary to protect the vital interests of the individual. This is typically limited to processing needed for medical emergencies.
- **Public functions** – the processing is necessary for administering justice, or for exercising statutory, governmental or other public functions.
- **Legitimate interests** – the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

As a member we believe you have a legitimate interest in hearing from us on matters relating to the administration and entitlements of your membership of the students' union e.g. what we're doing to represent you, opportunities members are entitled to and important union functions such as elections, general meetings and democratic procedures. You can then let us know at any time that you do not wish to receive marketing messages via the Contact details that are set out in the "Contacting us" section at the end of this privacy notice. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

Controllers are required to undertake a legitimate interest test which involves a careful assessment of the processing to ensure it properly balances the interest of the controller against any possible intrusion to the individual's privacy.

Where you have given us your consent to use your personal information in a particular way, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below. Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on a basis other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

3. How we collect your data

We typically collect personal information about our members in the following ways:

- **When you become a member** – When you register as a student at the university on an accredited course you automatically become a member of UUSU unless you have opted out of membership. Ulster University annually shares student data with us which includes information about you and your course. When the University gives us the data we become responsible for it and will use this as our central record of your membership of the Students' Union.

- **When you give it us directly** – You may give us your information when you register an account with us at www.uusu.org when you purchase any services or products we offer, in order to sign up to a student group, you register for a volunteering opportunity, you register for one of our events, undertake research activities, use our advice service, when you make a query and/or complaint or when you correspond with us by phone, email or in some other way. When you give us this information we take responsibility for looking after it and we may cross reference this data against our central membership records.
- **When you give it us indirectly** – Your information may be shared with us by third party organisations. These third parties will only do so when you have indicated that you have given consent to share this data with us or there is a lawful basis for the processing. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.
- **When you give permission for other organisations to share** – We may combine information you provide to us with information available from external sources 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 undertake market research
 - **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 website** – 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.

4. How long does UUSU hold your data?

UUSU's Retention and Disposal Schedules includes guidance on retention and disposal periods. A copy of the Schedule is available within UUSU's GDPR Policy. Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected. The retention periods vary depending on the type of data in question. At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning. If you have questions about specific retention periods, please contact the Data Protection Officer.

5. Categories of personal data processed by Ulster

The categories of personal data that Ulster may process are as below:

- personal contact details such as name, email addresses and telephone numbers;
- age, gender, student ID and address;

- faculty, department, course and college details;
- mode of study, attendance status, course end date and location of tuition;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- your use of and movements through our online systems, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your attendance at any events hosted by us;
- information obtained through electronic means such as swipe card records, CCTV footage and images in video and/or photographic form;
- your marketing preferences so that we know whether and how we should contact you.
- personal identification documents such as driving licence, passport and identity cards;
- details of next of kin, family members and emergency contacts;

We may also collect, store and use the following 'special categories' of more sensitive personal information regarding you:

- information about your race or ethnic origin, disability, gender identity and sexual orientation;
- information about your religious/philosophical beliefs and political opinions
- information about your health, including any medical conditions;

In relation to the special category personal data that we do process we do so on the basis that the processing is necessary for reasons of substantial public interest, on a lawful basis;

- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

We may also collect criminal records information about you. For criminal records history we process it based on legal obligations or based on your explicit consent.

UUSU occasionally takes photographs and videos of students at events and in various settings to capture and showcase student life, as well as the wider student experience. These images and video clips can be shared both internally and externally, across a range of channels and media including UUSU's website, social media and other marketing materials. We aim to inform all students involved in photography or filming and obtain the appropriate consents, where possible and practical to do so. Where this is not feasible, for example at large gatherings and events, or unless you have explicitly requested otherwise, we will assume that you have given your permission to be involved in image or video capture and for its subsequent use in any print or online promotional materials.

6. Who do we share your data with?

We sometimes share your personal data with trusted third parties through a data sharing agreement. Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the third parties we share personal information with are:

- Any party approved by you;
- Ulster University; to allow them to administer the accreditation of student rewards/opportunities [except for special category data].
- IT companies; who support our membership database, website and other business systems.
- Operational companies; such as contractors and delivery couriers
- Governing and national and regional bodies: to allow them to properly administer activity on a local, regional and national level. e.g. sports governing bodies.
- Our Commercial Partners: for the purposes of providing you with information, opportunities, products and services and other commercial benefits provided by our commercial partners as part of your membership entitlements and where you have given your express permission for us to do so.
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

7. International data transfers

The personal information we collect, in some limited circumstances, may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

8. Your rights as a Data Subject

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to data portability; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to data portability or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are not satisfied with how Ulster is processing your personal data, you can make a complaint to the ICO. Further information about your rights under the GDPR legislation are available on the ICO's website at: www.ico.org.uk.

9. Changes

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

10. Contact

In the event of any query or complaint in connection with the information we hold about you, please email our Data Protection Officer at d.longstaff@ulster.ac.uk or write to us at:

CEO and Data Protection Officer

UUSU

c/o University of Ulster

Room 11H03

Jordanstown Campus

Shore Road

Newtownabbey

BT37 0QB

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