



Privacy Notice

Context:

This statement outlines in plain language how we use your data, what data we hold on you and how we take measures to ensure the data we hold is kept securely and safely. For full details on our data protection processes and procedures please refer to our full suite of data protection related policies and procedures online at www.bedssu.co.uk/dataprotection

The Data Controller:

The data controller is Beds SU of the Campus Centre, University Square, Luton, LU1 3JU with an additional registered office at; The Hub, Polhill Avenue, Bedford, MK41 9EA and can be contacted on email by beds.su@beds.ac.uk or via telephone on 01582 743221.

The Data Protection Champion:

The data protection champion for the Students' Union is Lisa Roerig (Head of Marketing and Communication) and can be contacted with any concerns or questions surrounding the use and storage of your personal and sensitive data on su.data@beds.ac.uk.

Why We Process Data:

Beds SU collects a variety of different data which is outlined in the sections below to ensure we fulfil our obligations under the [1994 Education Act](#) to represent students and conduct fair and democratic elections and to ensure we meet our [charitable objectives](#) which have been agreed by the charity commission to pass the public benefit test. Our notice to the Information Commissioners Office in relation to the processing of such data can be found online [here](#). In summary, we use the data we hold:

1. To provide an interactive website that provides information that you're most interested in.
2. To facilitate student activities and groups that you express interest in or join such as sports, societies and volunteering.
3. To communicate membership services and opportunities that aid the student experience of those studying at the University of Bedfordshire.

4. To undertake diversity monitoring and engagement to ensure we can engage and fully represent the diverse membership of Beds SU.
5. To gain representational insight to allow elected representatives to fully represent the views of University of Bedfordshire students at University committees and meetings.
6. Supporting students at the University of Bedfordshire to resolve issues, complaints and disputes with the University or external organisations and bodies.
7. To communicate social and cultural activities run by the Students' Unions or closely chosen partner providers where you have given consent and the opportunity is of legitimate interest to you as a student at the University of Bedfordshire.
8. To promote the events and services of the Union through social media, publications, online content and other relevant digital media mediums.
9. To facilitate democratic processes as outlined in the Unions bylaws which can be found online [here](#).
10. To provide event ticketing for Union events/activities and sports and societies events/activities to ensure smooth and effective administration of such events/activities.
11. To process and run the Unions loyalty scheme in our commercial outlets linked to University ID numbers.
12. Improve the opportunities we offer by understanding which students engage in our activities.
13. To target social media engagement through Google tag manager and Facebook pixel for social media remarketing and engagement monitoring.
14. Using [google analytics](#) to monitor the engagement in communication mediums and website usage to improve the services and communications offered to students. To prevent this from happening please visit [here](#).
15. Using [hotjar](#) to monitor website usage to improve usability and accessibility for users of our website. To prevent this from happening please visit [here](#).

Our Legal Basis:

Beds SU collects and processes data based upon the following legal basis:

- Contractual requirements
- Explicit consent from data subjects
- Legal Obligations
- The legitimate interests of our members

What Data We Hold:

We receive the following data directly from the University of Bedfordshire following students agreeing to the University terms and conditions of registration which is administered through the University enrolment process:

- Student ID Number
- Forename
- Surname
- Date of Birth
- Gender
- University email address
- Nationality
- Domicile Country
- Fee Status
- Campus of Study
- Programme of Study Identification Number
- Level of Study
- Year of Study
- Course Start Date
- Course End Date
- Alternative Email Address
- Library card number
- Department of Study
- If on an Erasmus programme or not
- Ethnicity
- If in a final year of study or not
- Mode of study
- If on a placement or not
- Term time address
- Term time postcode

The above data is kept for a maximum of seven days after a student's course end date or within seven days from the University informing the Students Union that a student is no longer studying at the University of Bedfordshire. The accuracy of the data is maintained through regular data files provided electronically in a secure format from the University.

In addition, the Union collects additional data based upon:

- Participation in Union activities and services
- Participation in market research and student voice initiatives
- Use of the student advice service
- Completion of online account registration questions
- Participation in the Unions loyalty scheme
- The joining of sports clubs and societies
- Photos and filming took at Beds SU events in Beds SU venues
- Applying for employment opportunities within the organisation
- The use of google tag manager (please see privacy policy [here](#))
- The use of hotjar (please see privacy policy [here](#))
- The use of tracking cookies please see section below

The Use of Cookies:

Cookies are very small text files that are stored on your computer when you visit some websites. We use cookies to help identify your computer so we can tailor your user experience, track shopping basket contents and remember where you are in the order process. You can disable any cookies already stored on your computer, but these may stop our website from functioning properly.

The following is strictly necessary for the operation of our website.

- Remembering what is in your shopping basket
- Remembering where you are in the order process
- Remembering that you are logged in and that your session is secure.
- You need to be logged in to complete an order.

The following are not strictly necessary but are required to provide you with the best user experience and to tell us which pages you find most interesting (anonymously).

- Functional Cookies used to track the pages you visit via Google Analytics
- Targeting Cookies which allow you to share pages with social networks such as:
 - o Facebook (If available)
 - o Add This (If available) To view the 'Add This' Privacy Policy or to opt out of any online behavioural advertising, please visit [Add This](#) and click on the 'Opt Out' button.

The Unions website will not share any personal information other than with third parties that have been described in our data protection policy. If you don't want to receive cookies, you can modify your browser so that it notifies you when cookies are sent to it or you can refuse cookies altogether. You can also delete cookies that have already been set.

If you wish to restrict or block web browser cookies which are set on your device then you can do this through your browser settings; the Help function within your browser should tell you how. Alternatively, you may wish to visit www.aboutcookies.org, which contains comprehensive information on how to do this on a wide variety of desktop browsers.

Access To Your Data:

Beds SU takes the security of your information very seriously. You can change your subscription settings at any point by logging onto the website and editing your account settings in your profile.

Only authorised Union staff will have access to your data for the purposes specified in this privacy statement. We make sure that your data is only accessed for legitimate purposes by people who are facilitating your student experience.

In addition, if you join a club, group or society your basic information such as name, email and date of birth will be made available to the group administrators. Next of kin details may also be provided if you are asked for this as part of the registration process.

Anonymised demographic information of the group's membership will be used to improve activity but will not identify any individual.

We will not share any individual user details (including your email address) to any third party excluding the University of Bedfordshire without your consent. We do however use the following main data processors:

- **ARRK** (<http://www.arrkgroup.com>) our website provider for the sole purpose of technical support and for no other purpose or use.
- **Fidelity Systems** (<http://www.fidelitysystems.co.uk>) for technical support of our EPOS and instant loyalty system and for no other purpose or use.
- **Advice Pro** (<https://secure.advicepro.org.uk>) for technical support of our advice service software and for no other purpose or use. Advice Pro shares social Policy themes captured on Advice Pro in an anonymous manner with the National Union of Students.
- **National Union of Students (NUS)** (<http://www.nus.org.uk>) for the purpose of obtaining national trends and representational themes.
- **SJ Creatives** (<http://www.sj-creative.co.uk>) for graphics and digital asset design where data shared will be restricted to photos of unnamed individuals and direct quotes provided from students and service users and for no other purpose or use.
- **QBC Agency** (<http://www.qbcagency.co.uk>) for graphics and digital asset design where data shared will be restricted to photos of unnamed individuals and direct quotes provided from students and service users and for no other purpose or use.

Other organisations such as mailing houses as a data processor to deliver a service or communication message to you. In the event of this, the Union will enter into a data processing agreement with such organisations on the terms that data can only be used to administer the project specified and that all data will be destroyed following the project specified.

Where Is The Data Held:

- Data that is received from the University of Bedfordshire, joining sports and societies and through online behaviour recording is stored in Amazon's (AWS) European Data Centre in the Republic of Ireland.
- Data received from online forms used on the website is held on a secure server based in the United Kingdom and provided by My 1&1 Internet Limited (<https://www.1and1.co.uk>).

- EPOS and loyalty account details are stored in a secure server operated and administered in conjunction with the University of Bedfordshire's Information Communication Technology department.
- Data related to advice casework is held on a secure server operated and administered by Advice Pro and is located within the United Kingdom.
- Any data collected within any other applications or server will be clearly outlined to participants at the point of data collection and any data downloaded from any server will be held on encrypted devices or Microsoft OneDrive / Microsoft SharePoint and will only be kept in such locations for the length of time required to process such information for its intended purpose.
- If physical copies of data are required strict procedures will be followed to ensure the data is stored and used in a confidential manner and confidently disposed of after the intended purpose. For more information on how the Union manages and stores data please refer to the Unions data storage policy.

Photos and Filming:

- Beds SU will clearly indicate in its event listing and terms and conditions of event entry where photos or filming will be taking place alongside the physical displaying of notices within each of the Unions venues. Attendees at the event have the right to request not to be filmed or have a photo of them taken. Should any individual wish to request not having their photo taken or to be filmed they should make this intention aware to a member of Beds SU staff at the event and such requests will be implemented.
- Any requests for an image or an inclusion in a video to be removed from either being stored or publicly posted on social media, website or any other form of media contact should be made with the union by emailing su.data@beds.ac.uk and the images will be removed within 72 hours of the request being made.
- Any requests for an image to be removed from a printed publication should be made with the union by emailing su.data@beds.ac.uk and the Union will prevent further circulation of the publication and take steps that are practically possible to recall other copies of the publication already in circulation. Should any individual have any questions about the use of photos and filming they should contact the Union on su.data@beds.ac.uk.

Retention Period:

The table below outlines how long the Union retains each type of data, the justification for such retention period, the department/individual responsible and any action following the end of the retention period.

Area of Data:	Retention Period:	Justification of Retention Period:	Responsibility:	Actions required to ensure compliance:
Student data records	Maximum of one week after course end date	Records are relevant while a student is still a member of the Students' Union.	Marketing and Communications	Ensure data files contain delete commands and the website database is automatically deleting students moved into the alumni Usergroup.
Student membership data	Maximum of one week after course end date	Records are relevant while a student is still a member of the Students' Union.	Marketing and Communications	Ensure data files contain delete commands and the website database is automatically deleting students moved into the alumni Usergroup.
Online student behaviour	Maximum of one week after course end date	Records are relevant while a student is still a member of the Students' Union.	Marketing and Communications	Ensure data files contain delete commands and the website database is automatically deleting students moved into the alumni Usergroup.

Guest accounts	Five years following last online interaction	To ensure accounts and records are not lost while users still wish to access them	Marketing and Communications	A monthly audit of guest account activities to ensure the deletion of accounts.
Guest online behaviour	Five years following last online interaction	To ensure accounts and records are not lost while users still wish to access them	Marketing and Communications	A monthly audit of guest account activities to ensure the deletion of accounts.
Loyalty and EPOS data	Maximum of one year	To ensure users can earn and use loyalty points within an annual financial year	Marketing and Communications	Annual clearing of loyalty database on the 1 st August each year.
Market research	Until research is analysed	Personal data not required to maintain insight of information gained.	Individual staff members	All personal data removed from all stored data.
Online form submission	Eighteen months from submission.	Data kept for reasonable operational and administrative needs.	Marketing and Communications	Ensure Machform Server is set to automatically delete entries after 18 months.
Tickets purchased and event attendance	Four years after the completion of the event	To allow conformance with financial record keeping and the average student member period.	Marketing and Communications	A monthly audit of events to ensure the events more than four years old are deleted.
Employment application data	Eighteen months from submission.	To allow for requests for information and feedback to be successfully conducted and to hold effective and reliable HR files.	Marketing and Communications	Ensure Machform Server is set to automatically delete entries after 18 months.

Human resources record	Indefinite	For the use in legal and employment processes and to facilitate requests for references and other information,	HR and Finance	None.
Financial records	Five years	To ensure the Union can legally confirm and provide information for financial audits and HMRC requests.	HR and Finance	An annual audit of financial information held to ensure data of more than five years is confidentially removed.
Records on licence venue bans	Five years	To ensure compliance with licence requirements and to ensure a safe environment for students.	Venue Team	An annual audit of records of licence bans held to ensure data of more than five years is confidentially removed.
Advice case notes	Anonymised six years after the closure of the case	To ensure the student can be effectively represented and access to information can be provided where appropriate.	Student Voice	None; software automatically anonymises data six years after the closure of the case.
Student staff timesheets	Six years following employee being archived (employees are automatically archived after three months of no shift activity).	To ensure the Union legally confirms to financial record keeping.	HR and Finance	Annual audit to ensure staff are being automatically archived and deleted as appropriate.

Health and safety incidents and near misses	Five years following the incident	To ensure requests for information can be processed effectively.	All staff	An annual audit of business safe to ensure records are removed.
Records of media sales clients	Five years following the last booking of media space or asset.	To ensure effective communication between parties	Marketing and Communications	An annual audit of business safe to ensure records of organisations not used in the last five years is confidentially removed.
Photos and quotes provided for publications.	Indefinite	To promote the services the Union provides.	All staff	None.
Emails	Two years after sending or receiving	To ensure the process contained within the chain have ample time to be completed.	All Staff	Ensure automatically deletion is set within Outlook
Other data	To be confirmed	Any data collection not covered in this table will have a clear notice to users informing them of the retention period and associated practices.	Relevant staff	Actions confirmed with the notice given.

Your Rights:

Beds SU will ensure that it treats personal information lawfully and correctly. To this end the Union fully endorses and adheres to the principles and your rights of Data Protection as set out in the Data Protection Act 1998 as outlined below:

1. Personal data shall be processed fairly and lawfully, shall not be processed unless specific conditions are met,
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Furthermore, under the General Data Protection Regulations (GDPR) will become UK law in May 2018 you have the right to;

1. **The right to be informed** about what data is being held about you and how it is processed and managed which has been clearly outlined within this privacy statement.
2. **The right of access** to data that is held about you and you can do this by contacting us on su.data@beds.ac.uk
3. **The right to rectification** if the data that is held about you is inaccurate or incomplete and you can request this to be undertaken by contacting us on su.data@beds.ac.uk
4. **The right to erasure** of the data we hold upon you which is also known as the right to be forgotten. However, as the passing of the data to the students Union is part of a contractual agreement of enrolment at the University we can only process such a request for non-university data feed items. To request the right of erasure please contact us on su.data@beds.ac.uk

5. **The right to restrict processing** of the data we hold upon you. This means not deleting the data we hold upon you but placing a certain restriction or total restrictions on how we process it. To request the restricting of processing please contact us on su.data@beds.ac.uk
6. **The right to data portability** to receive the data we hold on you in an open source format such as in a CSV format. To request the data, we hold in such a format please contact us on su.data@beds.ac.uk
7. **The right to object** to the way your data is being held, processed or managed and you can do so by contacting us on su.data@beds.ac.uk
8. **Rights in relation to automated decision making and profiling** to be outlined to you which we have done in a section below.

Further in-depth information on your rights in relation to your rights under the General Data Protection Regulations (GDPR) can be found online [here](#).

Consent:

Data which is obtained through the Universities data feed is done so based on students agreeing to the Universities terms and conditions of enrolment through the Universities online enrolment process. You have a right to retrospectively withdraw your consent at any point by contacting us on su.data@beds.ac.uk.

For other data collected and processed explicit and informed consent is gained at the point of collection of which can be withdrawn at any point by contacting the Union on su.data@beds.ac.uk

All website users can change their direct marketing preferences online by following the following [link](#) for main Union communications and the following [link](#) for sports and societies communications.

Complaints:

Should you have a complaint about the management of your data please contact the Data Protection Champion Lisa Roerig on su.data@beds.ac.uk who will follow the [Unions complaint procedure](#) to investigate the matter.

You have a right to also complain to the UK Regulator of Data Protection. You can make a complaint or raise a concern to the Information Commissioners Office online [here](#)

Automated Decision Making:

Individuals have the right not to be subject to an automated electronic decision when:

- It is based on automated processing; and
- it produces a legal effect or a similarly significant effect on the individual.

The Union must ensure that individuals are able to:

- Obtain human intervention;
- Express their point of view; and
- Obtain an explanation of the decision and challenge it.

Currently, the Union doesn't undertake any form of automated decision-making.

Policy Number:	Approving Body:	Date Ratified by Board:	Renewal Date:
28.V2	Senior Leadership Team	October 2018	October 2020

