

# Consumers

## Privacy Statement

*Last Revised: 23rd May 2018*

### Introduction

ARTS Students' Union ("ARTS SU,"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 wouldn't reasonably expect.

We understand that the current UK Data Protection Legislation, the new General Data Protection Regulations (GDPR) and the Privacy and Electronic Communications Regulations (PECR), are the main legislation we must ensure we keep to.

Facilitating our legal requirements, organisation policy and services to our suppliers and contractors through using your personal data allows us make better decisions, communicate more efficiently and, ultimately, ensure you receive the services required.

### Where we collect information about you from

#### WE COLLECT INFORMATION IN THE FOLLOWING WAYS:

#### 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, to attend an event, purchase our products 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.

#### When you give it to us INDIRECTLY

Your information may be shared with us by independent organisations, by UAL 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, contact the third party, or make a complaint to the third party.

#### *Social Media*

Depending on your settings or the privacy policies for social media and messaging services like Facebook, Snapchat, Instagram 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. There are more details in our cookies statement which can be found at ([ARTS-SU.com/data-protection](https://arts-su.com/data-protection)).

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 from our shop, 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.

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

### *Consumers*

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 enrollment. 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 via [ARTS-SU.com/data-protection](https://arts-su.com/data-protection) 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 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
- Research responses
- Personal and academic issues you identify to us
- Your Likeness in a Photograph

We will mainly use your data to:

- Provide you with the services, products or information you asked for
- Administer your membership and our services
- 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 when you participate in one of our Sports
- Promote our Events and Services
- Satisfy any Legal Requirement such as the Licensing Act of 2003
- Protect you and others within our venues

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

We use profiling and screening techniques 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 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
- 3<sup>rd</sup> Party Processors such as Google, Unioncloud, Podio, Exchequer.
- Service provider partners
- University of the Arts London

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 and contracted processors.

Some of our processors run their operations outside the European Economic Area (EEA). Although they may not be subject to 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 and satisfy conditions necessary for a transfer of data outside the EEA. This includes EU Model Contract Clauses and Privacy Shields if applicable. 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.

## Keeping your information up to date

We request that Consumers make best attempts to ensure data held by the Students' Union is up to date and accurate. In the event of any changes to data or the discovery of any inaccuracies please update your contact information on your account at ARTS-SU.com within the personal details section. For all other information that is on ARTS-SU.com, please contact the [info@su.arts.ac.uk](mailto:info@su.arts.ac.uk).

For any other information that we may hold on you please place a Subject Access Request and a Rectification Request. This form can be found on our data protection webpage (ARTS-SU.com/data-protection.)

## Data Retention

We try and delete data as soon as we can and we will keep your sets of data for as long as one or more of the following conditions apply:

- a) 6 years after the last financial year (our financial year ends in July) in which you were paid or reimbursed.
- b) 6 years after the end of any contract that is held between you as an individual and the Union.
- c) 3 years after your date of last interaction with our Membership System
- d) 5 years after your last interaction with our website / emails / Social Media.
- e) 3 years after an event in one of our venues.

## Understanding the detail of our data security measures

When we process your data we will have already carefully assessed the lawful basis (reason) 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, an overview of this analysis can be accessed under the Documentation section on our data protection webpage (ARTS-SU.com/data-protection). Where we rely upon a legitimate interest to process your data we will have completed a legitimate interest assessment.

The Students' Union operates a Data Protection, Information Security and Systems Policy which is supported by a practical handbook for our employees and a separate handbook for our volunteers. All employees and volunteers handling data are required to undertake general data protection training, these are done on an annual basis 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. The Union utilises payment processor and ecommerce experts Unioncloud to handle these matters.

## Your Rights about Your Data

You have rights under Data Protection Legislation regarding your own personal data.

We detail all of your actionable rights on our data protection webpage (ARTS-SU.com/data-protection). Depending upon the lawful basis that is required for the processing of the personal data above, some rights may or may not apply. Under our process of ensuring any rights upon request, we will inform you of what personal data is exempt from your request and the lawful basis why.

If you have any questions please send these to [info@su.arts.ac.uk](mailto:info@su.arts.ac.uk) , and for further information see the Information Commissioner's Office Guidance (<https://ico.org.uk/for-the-public/>)

## 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 [info@su.arts.ac.uk](mailto:info@su.arts.ac.uk)