



Data Privacy Notice

Last Review Date – May 2018

BACKGROUND

Swansea University Students' Union understands that your privacy is important to you and that you care about how your personal data is used.

We respect and value the privacy of all of our members, staff, customers and stakeholders and will only collect and use personal data in ways that are described within this Data Protection Privacy Notice, and in a way that is consistent with our obligations and your rights under the law.

INFORMATION ABOUT US

Organisation Name - Swansea University Students' Union

Registered Charity Number -1149941

Registered Address – Faraday Building, Singleton Park, Swansea SA2 8PP

Data Protection Officer – Chief Executive Officer

WHAT DOES THIS NOTICE COVER?

This Data Protection Privacy Notice explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

WHAT IS PERSONAL DATA?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that the Union holds is set out within our Data Protection and Data Retention Policy.

WHAT ARE YOUR RIGHTS?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can *always* contact us to find out more or to ask any questions;
- b) The right to access the personal data we hold about you;
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete;
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have;
- e) The right to restrict (i.e. prevent) the processing of your personal data;
- f) The right to object to us using your personal data for a particular purpose or purposes;
- g) The right to data portability. This means that, if you have provided personal data to us directly, or we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases;
- h) Rights relating to automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, please contact us. You also have the right to lodge a complaint with the Information Commissioner's Office.

HOW DO YOU USE MY PERSONAL DATA?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it.

Your personal data may be used for one, or more than one, of the following purposes:

- a) Providing and managing your Students' Union account;
- b) Supplying our products and/or services to you or you supplying your products and/or services to us. Your personal details are required in order for us to enter into a contract with you;
- c) Personalising and tailoring our products and/or services for you;
- d) Communicating with you. This may include responding to emails or calls from you;
- e) Supplying you with information by email that you have opted-in to

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or text message with information, news, and offers on our products and/or services.

You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We use the following automated system[s] for carrying out certain kinds of profiling.

Membership Services Limited (MSL)

Our membership's management system uses automation in order to assign your student profile to specific groups. For example, if you purchase a Sport Swansea membership, your profile will automatically be added to the Sport Swansea members group. This means that we are easily able to reach out to all members of that particular group when necessary. It also allows us to keep track of how many members we have for any given group. Sometimes we have to reach out to groups of students based on their ethnicity or nationality. This is also done through this automated grouping system.

If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the GDPR gives you the right to do so. Please contact us to find out more.

HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

Your personal data will be kept in accordance with the Union's Data Protection & Retention Policy.

HOW AND WHERE DO WE STORE OR TRANSFER YOUR PERSONAL DATA?

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

DO WE SHARE YOUR PERSONAL DATA?

We may share your personal data with other subsidiaries in our group for marketing and other purposes.

We may sometimes contract with third parties to supply products and/or services to you on our behalf. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

HOW CAN YOU ACCESS MY PERSONAL DATA?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

Data subjects may make subject access requests (“SARs”) at any time to find out more about the personal data which the Union holds about them, what it is doing with that personal data, and why.

Anyone wishing to make a SAR should do using a Subject Access Request Form, sending the form to the Union’s Data Protection Officer.

The Subject Access Request Form is included as Appendices 2 of the Union’s Data Protection and Data Retention Policy.

Responses to SARs shall normally be made within one month of receipt, however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the data subject shall be informed.

All SARs received shall be handled by the Union’s Data Protection Officer or member of the Data Protection Team.

The Union does not charge a fee for the handling of normal SARs. The Union reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

HOW DO YOU CONTACT US?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details

Data Protection Officer
Swansea University Students’ Union
Faraday Building
Singleton Park
Swansea
SA2 8PP
dataprotection@swansea-union.co.uk

CHANGES TO THIS PRIVACY NOTICE

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via our Website at:

<https://www.swansea-union.co.uk>