# **Privacy Policy Notice**

# Introduction

**The policy:** This privacy policy notice is for this website <u>www.hertfordshire.su</u> and served by Hertfordshire Students' Union, College Lane, Hatfield, Hertfordshire, AL10 9AB and governs the privacy of those who use it. The purpose of this policy is to explain to you how we control, process, handle and protect your personal information while browsing or using this website, including your rights under current laws and regulations. It applies to information we collect about:

- Our members, officers, volunteers, councillors, committees and trustees
- Users of our websites
- People who use our services
- People who give us feedback, make suggestions, complete questionnaires, polls or make complaints
- Suppliers and agents
- Donors and supporters

If you do not agree to the following policy you may wish to cease viewing / using this website.

Policy key definitions:

- "I", "our", "us", or "we" refer to the business, Hertfordshire Students' Union.
- "you", "the user" refer to the person(s) using this website.
- GDPR means General Data Protection Act.
- PECR means Privacy & Electronic Communications Regulation.
- ICO means Information Commissioner's Office.
- Cookies mean small files stored on a user's computer or device.

# What do we do with your data

Under the GDPR (General Data Protection Regulation) we control and process personal information about you electronically and securely. We are also registered with the ICO under the Data Protection Register, our registration number is: Z6561396.

We have a data sharing agreement with the University of Hertfordshire. All students who study at the University will automatically become members of the Students' Union and the University will share students' data with us for the purposes of administering the students' membership of Hertfordshire Students' Union. Some examples of instances where we will process your data include

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for educational information, Information regarding Societies, Volunteering and events to ensure that you get the most out of your studies as a student at the University of Hertfordshire.

### We process your information in the following ways:

- Administration of Student Groups, Committees, Volunteering and related activities
- Administration of Officer and SU Council Elections and Referendum
- Managing Society and Committee Accounts and Records
- Provision of Advice and Support Services
- Employment Administration
- Research and planning

We also use your data to let our members, volunteers, partners and customers know about things happening at Hertfordshire Students' Union that may interest them. This includes:

- Advice and Support Services
- Fundraising
- Jobs, Discounts and Offers
- Advertising, Marketing and Public Relations
- Events and Extra-Curricular Activities

We want to bring you offers and promotions that are most relevant to your interests at particular times. To help us form a better, overall understanding of our members and customers, we may combine your personal data gathered across the organisation. We may also combine the shopping history of many members and/or customers to identify trends and ensure we can keep up with demand, or develop new products/services.

### We may collect your data at a number of points:

- When you visit any of our websites to use our services or buy products in a shop or online.
- When you engage with us on social media.
- When you join a society.
- When you choose to run for an elected leadership position within the Students' Union.
- When you contact us by any means with queries, complaints etc.
- When you book any kind of appointment with us or book to attend an event.
- When you choose to complete any surveys we send you.
- When you comment on or review our services.
- When you've given a third party permission to share with us the information they hold about you.

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- When you use our buildings and venues which usually have CCTV systems operated for the security of our members and customers. These systems may record your image during your visit.
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### What sort of data do we collect?

- The University of Hertfordshire shares your enrolment data with us.
- If you have a web account with us we may collect your name, gender, date of birth, billing/delivery address, orders and receipts, email and telephone number.
- Details of your interactions with us in shops, bars, venues, online or by using one of our apps.
- Copies of documents you provide to prove your age or identity, for example when entering one of our club nights.
- Details of your visits to our websites or apps, and which site you came from to ours.
- Information gathered by the use of cookies in your web browser. Learn more about the cookies we use under "Internet Cookies".
- Payment card information.
- Your image may be recorded on CCTV when you visit our buildings.
- To deliver the best possible web experience, we collect technical information about your internet connection and browser as well as the country and telephone code where your computer is located, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

### How do we secure your data?

We secure access to all transactional areas of our websites and apps using 'https' technology.

Access to your personal data is password-protected, and sensitive data such as payment card information) is secured and tokenised to ensure it is protected.

### How long do we keep your data for?

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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 varies depending on the type of data in question, but as a student when you finish your studies this will be deemed as the end of a retention period.

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.

# **Third-Party Organisations**

We sometimes share your personal data with trusted third parties. 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.
- Your details will never be sold or passed onto a third party for their Marketing purposes.

Examples of the kind of third parties we work with are:

- The IT company that manage our website
- Google/Facebook to show you products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our websites. 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.
- Bit.ly Your data is anonymised, but used to monitor website traffic
- Mailchimp to send emails to customers who are not students either to fulfil our contractual obligations or on the basis of consent
- NUS Extra to allow us to give you access to NUS Extra discount cards and hundreds of discounts in the UK and EU. You can see their privacy policy <u>here</u>.

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- When you make a transaction on our website, it goes through Sage Pay or WorldPay. Click below to see their privacy policies:
  - o <u>Sage Pay</u>
  - o <u>WorldPay</u>

# Our legal basis to use your data

The law on data protection sets out a number of different reasons for which an organisation may collect and process your personal data, including:

### <u>Consent</u>

In specific situations, we can collect and process your data with your consent. For example, when you opt-in to receive email marketing about our Commercial services including The Forum Hertfordshire.

#### **Contractual Obligations**

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, if you order a ticket from our website, you will automatically be sent a confirmation email.

#### Legal Compliance

If the law requires us to, we may need to collect and process your data. For example, we can pass on details of people involved in fraud or other criminal activity affecting Hertfordshire Students' Union to law enforcement.

#### Legitimate Interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running Hertfordshire Students' Union and which does not materially impact your rights, freedom or interests. For example, we will use the email address that you have provided to the University to send you information about the SU elections. We will continue to process your information under this basis until you withdraw consent or it is determined your consent no longer exists e.g. Upon finishing your studies at the University of Hertfordshire.

If, as determined by us, the lawful basis upon which we process your personal information changes, we will notify you about the change and any new lawful basis to be used if required. We shall stop processing your personal information if the lawful basis used is no longer relevant.

# Your individual rights

Under the GDPR your rights are as follows. You can read more about your rights in details here;

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- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- the right not to be subject to automated decision-making including profiling.

You also have the right to complain to the ICO [www.ico.org.uk] if you feel there is a problem with the way we are handling your data.

We handle subject access requests in accordance with the GDPR. To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

# Internet cookies

We use the following cookies to ensure you get the best experience on our website and to analyse our website traffic.

### Necessary

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

| ASP.NET_SessionID | Stores a temporary unique identifier for your session – no<br>other information is stored. This cookie is removed when<br>you close your browser. | Expires on exit of<br>browser |
|-------------------|---|-------------------------------|
| _AntiXsrfToken    | Contains a unique ID that is checked upon every website<br>request in order to prevent false requests. (Cross-Site<br>Request Forgery prevention) | Expires on exit of<br>browser |
| JSessionID        | Preserves users states across page requests   | Expires on exit of browser    |
| Visit             | This is a session cookie that is required for the website to function   | Expires on exit of<br>browser |

### Statistics

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Statistics help us understand how you interact with our website by collecting and reporting information anonymously. We use this information to improve our website and the information that we give you.

| _gat | Used by Google Analytics to throttle request rate | Expires on exit of<br>browser |
|------|---|-------------------------------|
| _ga  | Used via Google Analytics to distinguish users    | 2 year expiry                 |
| _gid |   | Expires on exit of<br>browser |

### Marketing

These cookies track visitors across websites. We use this information to improve our website and the information that we give to you. They can also be used to display ads that are relevant and engaging to you.

| collect | Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels. | Expires on exit of<br>browser |
|---------|---|-------------------------------|
| tr      | Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.                    | 3 months                      |
| tr      | Used by Facebook to track site visitors to and from Facebook.   | Expires on exit of<br>browser |

# Data security and protection

We ensure the security of any personal information we hold by using secure data storage technologies and precise procedures in how we store, access and manage that information.

Occasionally we will need to share your personal data with third parties outside the European Economic Area (EEA), such as the USA.

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway. We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA. If we do this, it will only be to fulfil your order, process your payment details or provide support services on a contractual basis. If you are not a student, we may do this on the basis of a contractual obligation or consent.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, our contracts with third parties stipulate the standards they must follow at all times.

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Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

# Sponsored links

At times, our website may contain adverts on our pages and links to affiliate websites (typically NUS Extra. You can find their Privacy Policy <u>here</u>). These are usually self served through our own means. We only use trusted advertising partners who each have high standards of user privacy and security. However we do not control the actual adverts seen / displayed by our advertising partners.

We use advertising partners in these ways to help generate an income from the website, which allows us to continue our work and provide you with the best overall experience and valued information.

If you have any concerns about this we suggest you do not click on any adverts, sponsored or affiliate links found throughout the website.

# Email marketing messages & subscription

Under the GDPR we use legitimate interest and/or consent for anyone subscribed to our newsletter or marketing mailing list. The University shares students' data with us as part of our data sharing agreement, but we only use necessary data for the specific Marketing purpose it is required for. Any email marketing messages we send to students are done so through MSL, our website provider who stores the data sent directly from the University. For non-students we use a third-party provider to send emails if you have opted in to receive email Marketing messages.

Email marketing messages that we send may contain tracking beacons, tracked clickable links or similar server technologies in order to track subscriber activity within email marketing messages. Where used, such marketing messages may record a range of data such as; times, dates, I.P addresses, opens, clicks, forwards, geographic and demographic data. Such data, within its limitations will show the activity each subscriber made for that email campaign.

Any email marketing messages we send are in accordance with the GDPR and the PECR. We provide you with an easy method to withdraw your consent (unsubscribe) or manage your preferences. See any marketing messages for instructions on how to unsubscribe or manage your preferences, you can also <u>unsubscribe from all MailChimp lists</u>. Your details will never be sold or passed onto a third party for their Marketing purposes.

Our website provider is MSL. As a student at the University of Hertfordshire you are automatically a member of Hertfordshire Students' Union. Due to our data sharing agreement with the University, where your data is shared with us in order to enable us to deliver a service to students, we hold the following information about you within our website system;

• Email address you have given to the University to be contacted on

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- Phone number you have provided the University with (if applicable)
- Date of birth
- Address you have provided the University with (if applicable)
- I.P address
- Subscription time & date

These are all held securely on our system and access is limited to only those who need access to service your needs as a student.

### If you want us to stop using your data

- You can stop direct marketing communications from Hertfordshire.su by clicking the 'unsubscribe' link in any email communication that we send you or visiting <u>http://bit.ly/HSUContact</u>. We will then stop any further emails in those particular categories of marketing that you choose.
- All students at the University of Hertfordshire automatically become members of Hertfordshire Students' Union. However you do have the right to request not to be a member. You will not be unfairly disadvantaged by doing so, but you will lose the right to vote on SU decisions, hold elected positions in the SU including those in the Officer team, committees, societies, and benefit from our student pricing for entertainment and events. Any student who wishes not to be a member of the Students' Union, should inform the President of the Students' Union and the Director of the Students' Union in writing at contact@hertfordshire.su.
- Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

# **Resources & further information**

If you have any questions that haven't been covered, please contact our Data Protection Officer, Phil Mackay, who will be pleased to help you at contact@hertfordshire.su.

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the <u>Information Commissioner's Office</u>.

You can contact them by calling 0303 123 1113.

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