Student Data Privacy and Fair Processing Statement

1. Introduction

Wrexham Glyndwr Students' Union 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 to do anything with it which you would not reasonably expect.

Having information about our members allows us to tailor your student experience, make more informed decisions, communicate with you effectively and represent you to the best of our abilities.

Under the General Data Protection Regulations (GDPR) the legal bases the students' union uses for processing your information are:

- **Legal obligation (process c)**: processing your data is necessary for us to carry out our legal obligations in relation to the 1994 Education Act. Under this particular processing basis, your data will only be used for purposes outlined in the Education Act (see section 2.1 for more detail)
- **Necessary for the performance of a task (process e)**: this is where once you have enrolled as a student at Wrexham Glyndwr University, the University transfer information as outlined in point 6
- **Legitimate interest (process f)**: this is where we need to process your data for a legitimate interest. For example, if you have been elected as a Course Rep there is a legitimate reason for us contacting you regarding this. (More detail on this is in sections 2.2, 2.3, 2.4, 3, 5, 6 and 8).
- **With your consent (process a)**: this is where you have consented directly to us, either during the enrolment process or via our website to say that you want to be contacted by us about students' union activities (see section 2.1 and 2.2 for more detail).

2. Where we collect your information from:

2.1. When you become a member

When you enrol at Wrexham Glyndwr University, you automatically become a member of Wrexham Glyndwr Students' Union. The University shares data about you and your course with us for the purpose of voting in democratic students' union elections as per the 1994 Education Act. You will only be contacted about the elections by us for this purpose.

You will also have the opportunity at enrolment to 'opt in' to receiving other information from us about our services including, but not limited to our advice service, representation services, events, campaigns, sports and society information.

When the University gives us this data, we become responsible for it and will use this as our core central record of your membership. If you wish to opt out of students' union membership entirely, this should be done in accordance with our bye-laws which can be found on our website.

2.2. When you give it to us directly

You may give us your information in order to sign up to a society, sports team, one of our events, use our advice service, 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 from the University.

2.3. When you give it to us indirectly

Your information might be shared with us by organisations independent from us, such as Wrexham Glyndwr University or third parties we pair up with such as events companies. These independent third parties should only share your data with us when you have given your consent for them to do so. They will have their own Privacy Policy so you can check these to fully understand how they will process your data.

2.4. When you give permission to other organisations to share e.g. NUS

There may be occasions when we may combine information you provided to us with information available from external sources such as NUS. This will allow us to gain a better understanding of our members to improve our services to you.

3. When we could collect your data through third party organisations

3.1. You may have given permission for a company or other organisation to share your data with us. This could be when you bought a product or service, registered for an online competition or signed up with a website.

3.2. *Social Media* Depending on your settings or the privacy policies for social media and messaging services, you might give us permission to access information from those accounts or services.

3.3. *Information available publically* This This may include information found in places like newspapers, articles and Companies House

4. We collect your information as you use our website

Like most websites, we use "cookies" to help us make our website 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, phone or tablet. They make interacting with a website faster and easier, for example by automatically filling in your name and address in text fields.

In addition, they type of device you're using to access our website and the settings on that device may provide us with information about your device such as what type of device it is or 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.

5. What happens when you buy a product from us?

To place an order with us online you will need to register on our website. At the point of registration, we request certain information including your name, delivery address and email address. This is required to enable us to process your order and notify you of its progress. Once an order has been placed we might contact you by email to confirm your order details and again once your order has been accepted

and dispatched. 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. We also ask if you will provide us with your student ID when you shop which allows us to track products you've purchased to provide better customer service standards and develop the product range we offer to students. If you visit our physical shop in the students' union building you are under no obligation to provide us with this information.

If you make a purchase on our website, you will be asked to provide debit/credit card details. This is processed externally by our web provider via 'WorldPay' and the students' union does not hold, nor can access this information.

When you buy a product from us in our shop, your card details will not be printed on the merchant or customer receipt, only the last 4 digits of the card used will appear on the receipt. WGSU is PCIDSS compliant.

6. What personal data we collect and how we use it

If you are a student at Wrexham Glyndwr University and therefore a member of the students' union, certain information you provide at enrolment will be shared with us this includes: your name; student ID number; course, level, location and type of study; date of birth and student email address. This then allows us to give you the best possible service and excellent levels of administration and communication. In addition, when you attend at event, join a student group or use one of our services, we may ask for additional information such as: information regarding your health if you are participating in an activity for which we insure you (e.g. Sport); any access requirements if you are attending an event or activity so we can provide assistance if required or any dietary requirements if you are attending an event.

We will mainly use your data to:

- Provide you with the services, products or information you asked for
- Administer your membership
- 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 required (if participating in Sport for example)
- Generate demographic reports
- Verification of student identity

7. Communication

We may also use your data to help us in building profiles of our members and targeting our communications, this means we can target our resources effectively. For example, if we want to communicate an issue which impacts on Post Graduate students, we only want to contact Post Graduate students or we may want to see which school had the highest proportion of voters in our elections. Your data for this purpose will only be used to identify broad statistics and not you as an individual.

8. How we keep your data safe and who has access to it

Personal data collected and processed by us may be shared with students' union employees, volunteers or freelance workers under strictly controlled conditions. 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 for. We do not sell or share your personal information for other organisations to use.

We undertake regular reviews of who has access to your information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers or freelance workers.

Some of our suppliers might run their operations outside the European Economic Area (EEA). Although they may not be subject to the 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.

We may need to disclose your details if required to the police (c), regulatory bodies (c)or legal advisors(e)

We would only share your data in other circumstances if we have your explicit and informed consent.

9. Marketing and communications preferences

When you enrol at the University, you will get the opportunity to opt into marketing preferences from us and again the first time you log into our website. You can opt out of these communications at any stage by clicking the unsubscribe link contained within the email.

10. Keeping your information up to date

We mostly use the data transferred by the University to maintain accurate data about you as described above, but we really appreciate it if you let us know if your contact details have changed.

11. Retaining your data

We will only retain your personal data for as long as necessary for fulfil the purposed for what we collected it for. This includes for the purposes of satisfying any legal, accounting or reporting requirements. Generally speaking, we would only retain your data for the time in which you are a student at Wrexham Glyndwr University unless you have used a service where it has been explained to you that this could be longer. Details are outlined in our retention schedule.

To determine the appropriate retention period for data, we consider the type of data, potential risk and harm from unauthorised use, the purposes for which the data is needed and whether what we are trying to achieve can be done so using other means. In some circumstances we may anonymise your personal data so that it is no longer associated with you for research or statistical purposes (for example, in order to have a record of voter demographics) in which case that information could be used indefinitely.

Membership Information (retention schedule)				
General register of members		Kept only for the duration of membership	Membership record through NUS Digital	General Data Protection Regulation
Society/Sport Membership registration/Information		Keep only for the duration of the membership	Membership record through NUS Digital	General Data Protection Regulation
Results of student surveys: summaries and analyses of responses	3 years	From date of completion	Student Surveys results and analyses	Historic / Commercial Value
Student Representative information (Course Reps)	3 years	Current year + 3 years after office term has ended	Programme Representative course information	Historic / Commercial Value
Records of student volunteers	3 years	Current year + 3 years after position has ended	Registration details Volunteer Role Descriptions	Historic / Commercial Value
Advice service case files and related documentation held within Advice Pro	6 years	After Last action on case	Records documenting the provision of Welfare/Advice Services to individual students stored on Advice Pro	Limitation Act 1980

12. Understanding the detail of our security measures

When we process your data we will have already carefully assessed the lawful justification for doing so, the parameters in which the data is processed, the length of time we hold your data and the secure storage of your data. The Students' Union operates a Data Protection Policy for our employees and volunteers. All employees and volunteers handling data are required to undertake general data protection training and third parties handling data undertake general data protection training. Third parties handling data are also required to provide a contact which meets the requirements of the Information Commissioner's Office.

13. CCTV

WGSU has CCTV installed in its premises in line with its Premises Licence. We have a separate policy for our CCTV which can be found https://www.wrexhamglyndwrsu.org.uk/main-menu/your-union/privacy-statement

14. Your right to know what data we hold about you, make changes or ask us to stop using your data

You have a right to ask us to stop processing your personal data and/or ask for a copy of the information we hold about you. Information on how to do this can be found at Information on how to do this can be found at https://www.wrexhamglyndwrsu.org.uk/main-menu/your-union/privacy-statement

15. 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 union@glyndwr.ac.uk

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