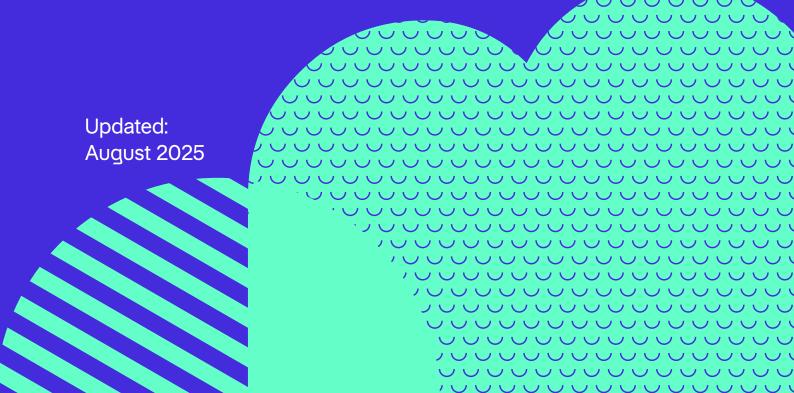


# STUDENT DATA PRIVACY STATEMENT





### **Student Data Privacy Statement**

Bucks Students' Union ("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 to do anything you wouldn't reasonably expect from us.

As a membership organisation, we are constantly trying to develop a better understanding of our members and by using your personal data allows us to make better decisions, communicate more efficiently and, ultimately, to help us fulfil our mission of making life better for students at Bucks.

This privacy statement outlines what personal data is processed by the Union, in relation to its members, the legal basis for processing personal data, storage and retention requirements, and the data subject's rights regarding their data.

#### **Definitions**

**Personal data** is any information relating to an identified or identifiable natural person ('data subject'). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identified, such as a name, an identification number, cardholder data, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Sensitive personal data** includes information relating to racial or ethnic origin, disability, political opinions, religious beliefs, trade union membership, health, sex life and criminal convictions. The processing of sensitive personal data is subject to much stricter conditions.

**Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Data controller** is the natural or legal person, public authority, agency or other body which, along or jointly with others, determines the purposes and means of the processing of personal data.

**Data processor** is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

**Consent of the data subject** means any freely given, specific, informed and unambiguous indication of an individual's wishes by which they, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to them.

## **Responsibilities**

#### **Our responsibility**

In accordance with the UK General Data Protection Regulation (UK GDPR), Data Protection Act (2018), and Data (Use and Access) Act 2025, Bucks Students' Union is the data controller. That means we are legally responsible for the personal data that we collect and hold about you.



The senior person responsible for ensuring that the Students' Union is compliant with relevant data protection laws is the Data Protection Officer. The Data Protection Officer for Bucks Students' Union is the Head of Communications and Marketing.

The Union agrees that personal data shall be:

- processed lawfully, fairly and in a transparent manner, in relation to the data subject
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible
  with those purposes
- adequate, relevant and limited to what is necessary in relation to the purpose(s) for which they are processed
- accurate, and where necessary, kept up to date
- kept in a form which permits identification of data subjects for no longer than is necessary for the purpose(s) for which the personal data is processed
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

#### Your responsibility

As a student, it is your responsibility to ensure that all personal data provided to the Union is accurate and up to date. You should also ensure that you have read and understood the applicable data privacy statements and how these apply to you as a member of Bucks Students' Union. You can either call us on 01494 601 600 or email <a href="mailto:sudataprotection@bnu.ac.uk">sudataprotection@bnu.ac.uk</a> if you have any concerns.

## Where we collect information, about you, from

We collect information in the following ways:

#### When you become a member

When you enrol on an accredited course, at Buckinghamshire New University, you automatically become a member of Bucks Students' Union. Buckinghamshire New University regularly shares information with us which includes data about you and your course. Information on the legal basis the University uses to share your information with us is available in the University's <u>Student application and Enrolment Privacy Notice</u> and the <u>Students Privacy Notice</u>. When the University gives us this data we become responsible for it and will use this as our core central record of your membership.

#### 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, take part in research activities, use our Advice Centre, purchase our products, register for volunteering opportunities 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 membership records.

#### When you give it to us indirectly

Your information may be shared with us by independent organisations for the purposes of administering some of our core services. You should check their privacy statements 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 and 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 may come 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, purchase tickets for an event or sign-up for a volunteering opportunity.

#### Social media

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.

#### Information available publicly

This may include information found in places such as Companies House and information that has been published in articles or newspapers.

#### When we collect it, as you use our website

Like most websites, we use cookies to help us understand the way you use it and improve the user experience. Cookies are small text files that are transferred to your computer, phone or tablet and are used to essentially remember you. They make interacting with a website faster and easier, for example by automatically completing your name and address details. More information is available within our Cookie Statement.

Additionally, the type of device you're using to access out website and the settings on that device may provide us with information about your device, including what type of device it is 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 you will need to either login, using your Blackboard account details, or create a guest account. At the point of registration, we will 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. Should we need to contact you for any reason relating to your order we will use the email address registered to your account or the telephone number you provided. We also ask if you will provide us with your student ID number when you shop instore as a record of the transaction and to enable us to develop the product range we offer to students. For more information, please see the General Data Privacy Statement.



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

The type and quantity of information we collect and how we use it depends on why you are providing it.

#### **Our members**

If you are one of our members, Buckinghamshire New University provide us with a set of key information you provided at enrolment. The sharing of this information is covered by a data sharing agreement, between the University and Students' Union. 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.

In addition, when you attend an event, join a student club or society, register for a volunteering opportunity or use one of our services, we may ask for additional information, such as:

- your date of birth to ensure compliance with age-related laws
- information relating to your health, if you are taking part in specific activities
- any disabilities so we can provide assistance, if required
- · your bank details to facilitate payments, if required
- personal and academic issues you identify to us
- research responses.

We will 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 any National Governing Bodies (NGB) or other sports-related partnerships.

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

From time to time, we use segmentation techniques to ensure our communications are relevant and to provide an improved experience for our members. 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 will only ever be analysed through demographic reports, which only analyses broad statistics and is non-identifiable data.



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

Personal data collected and processed by us may be shared with Students' Union employees and, under strictly controlled conditions, the following groups, where necessary: information from partner organisations or organisations who support us in these communications.

- Buckinghamshire New University
- voluntary organisations
- sports bodies
- advisers
- other service provider partners.

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.

Some of our suppliers run their operations outside the UK and European Economic Area (EEA). Although these suppliers may not be subject to the same data protection laws as companies based in the UK or EU, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us, you agree to this transfer, storage or processing at a location outside the UK and 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. We acknowledge the fact that due to the nature of our work, and acting as a representative organisation for students, in certain circumstances, we are duty bound to protect the rights of other individuals, or other third parties, where information is disclosed to us confidentially. Where information is disclosed to us in express confidence, we have an obligation to respect this and we may treat this information as being exempt under the UK GDPR and Data Protection Act (2018). This will be treated on a case by case basis and we will endeavour to disclose as much information as possible, within the permitted boundaries of the law and respecting the duty of confidence to other individuals.

## **Marketing and communications preferences**

**Membership communications** As a member, you have a legitimate interest in hearing from us about the products and services we offer, what we're doing to represent you and opportunities that might be of interest to you. Occasionally, we may include information from partner organisations or organisations who support us in these communications. You may opt-out of these communications at any point by clicking on the unsubscribe link at the bottom of the email or by emailing <a href="mailto:sudataprotection@bnu.ac.uk">sudataprotection@bnu.ac.uk</a>.

**Direct marketing:** As a charity, we need to fundraise to provide the range of services we offer to our members, students of Buckinghamshire New University. From time to time, we will send marketing materials, on behalf of external clients, to our members, where you have told us that we can do so. We do not sell or share personal details to third-parties for the purposes of direct marketing.



**Controlling what you want to hear about:** We make it easy for you to tell us how you want us to communicate, in a way that suits you. We will mostly communicate by email but there will be clear instructions on how to opt-out when we send you information (normally through a link that is included at the bottom of emails). If you don't want to hear from us, that's fine. Just let us know by contacting us on 01494 601 600 or sudataprotection@bnu.ac.uk.

You have a right to ask us to stop processing your personal data, and if it's not necessary for the purpose you provided it to us (eg processing your membership or registering you for an event) we will do so. You can either call us on 01494 601 600 or email sudataprotection@bnu.ac.uk if you have any concerns.

You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

If you want to access your information, you must complete the <u>Subject Access Request Form</u> with a description of the information you want to see and the required proof of your identity, by post, to Bucks Students' Union, Queen Alexandra Road, High Wycombe, Buckinghamshire, HP11 2JZ. We do not accept these requests by email so we can ensure that we only provide personal data to the right person.

## Understanding the detail of our data 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 the data is held for, the secure storage of your data and undertaken impact assessments to ensure your rights are delivered.

The Students' Union operates a <u>Data Protection and Information Security Policy</u> which is supported by a practical <u>Data Protection and Information Security handbook</u> for our employees and volunteers. All employees handling data are required to undertake general data protection training and third-parties handling data are required to provide a contract which meets the requirements of the Information Commission's Office.

The Students' Union does not store any card data on any of our systems for online transactions. The Union utilises Elavon (through SagePay or Opayo), Stripe or PayPal as payment processors for these transactions.

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

Data protection laws, and in particular the UK GDPR, gives individuals greater control over their personal data. We have an obligation to enable and facilitate the exercise of data subject's rights, relating to:

- right to be informed
- right of access
- right to rectification
- right to erasure



- · right to restrict processing
- right to data portability
- right to object
- rights related to automated decision-making, including profiling

We will consider requests relating to any of the rights listed above in accordance with all relevant and applicable data protection laws and regulations.

If you want to access your information, you should aim to complete a <u>Subject Access Request Form</u> with a description of the information you want to see and the required proof of your identity, by post, to Bucks Students' Union, Queen Alexandra Road, High Wycombe, Buckinghamshire, HP11 2JZ. Although you can request access to your data in several ways, we will still need to you to verify your identity to ensure we are releasing data that we hold on you to the correct person.

It is preferred that requests to any other rights, including the rectification of personal data that we hold on you, is made in writing to ensure that we maintain accuracy in the data we hold on you.

If you have any questions or if you would like to exercise your rights on any data that we hold on you, please send them to <a href="mailto:sudataprotection@bnu.ac.uk">sudataprotection@bnu.ac.uk</a>. For further information see the <a href="mailto:InformationCommissioner's Office - guidance document.">Information Commissioner's Office - guidance document.</a>

## **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 then 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 sudataprotection@bnu.ac.uk.