

THE STUDENTS' UNION (*THE SU*) PRIVACY POLICY

Rationale: To set out how The SU adheres to the General Data Protection Regulation (*GDPR*) and the Privacy and Electronic Communications Regulations (*PCER*).

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How The SU uses personal data

The SU uses personal data for the following purposes:

- to identify and represent the views of Student Members;
- to provide services, products or information asked for;
- to administer membership, including membership of SU clubs, societies and networks;
- to set-up voting permissions for SU elections and referendums;
- to contact members about formal matters that we are required to by law;
- to enable us to respond to queries/requests efficiently and accurately;
- to understand how we can improve our services, products or information;
- to tailor marketing and communications to individual preferences;
- to provide an efficient and smooth website experience.

Personal data The SU collects about Students

When students complete registration at the University of Bath they automatically become members of The SU.

As part of a data sharing agreement the University shares the following personal data with The SU:

- Student ID;
- Title, first name, middle name, surname, preferred name, gender, and date of birth;
- University email address, mobile phone number and home address;
- Faculty, department, course name, course code, course end date and year of study;
- Type of Student: Undergraduate, Postgraduate taught, Doctoral;
- Fee status: Home, EU, Overseas student;
- Mode of study;
- On placement y/n;
- Nationality and country of residence;
- Care leaver y/n, parental responsibility y/n, care giver y/n, first family member to attend University y/n;
- SAMIS student status (*Current student, suspended etc*);
- Additional fields such as disability, ethnicity, POLAR are provided as aggregated data through Business Objects (these fields are not accessible through MSL and attributed to individual students).

The University shares this personal data with The SU on the basis that there is a legitimate interest for students to be offered with the membership services provided by the Union, which include representation functions.

Personal data The SU collects about service users

The SU collects and processes the following personal data about service users:

- Club memberships, committee roles, representative roles and other voluntary roles;
- Photography & filming taken at events;
- Award nominations, event plan submissions and vehicle hires;
- Insurance claims;
- Records of ticket/product purchases/refunds;
- Bank details to facilitate payments;
- Advice & support student case files.

This personal data is shared directly by service users with The SU on the basis of consent and that there is a legitimate interest for this to be provided in order to deliver the services they are using.

Storing personal data

The SU has agreements in place with the following to store and process data securely on our behalf:

- The University of Bath;
- AdvicePro;
- MSL.

With the exception of the above, personal data will not be shared by The SU with any other third parties (*except where required by law*) without the permission of the individual to whom the data relates to.

Each of the organisations listed above have their own privacy policies which can be found on their websites.

The SU keeps:

- student records and membership details for three years after they leave the University before being disposed of automatically by MSL;
- student member disciplinary records and complaints for four years before being disposed of manually by staff;
- student advice and support case notes are automatically deleted by AdvicePro after a case has not been active for more than 6 years;
- student reimbursement records for seven years before being disposed of by the Finance Team.

Marketing

The SU will occasionally send Student Members information about products and services it thinks will be of interest to them during their time at the University of Bath.

Student Members who have agreed to receive marketing communications may always opt out at a later date by unsubscribing or updating their preferences on their website profile page.

Subject access request

Under GDPR individuals have the following rights in relation to their personal data:

- right of access - the right to ask for copies of your personal information;
- right to rectification - the right to ask for personal information you think is inaccurate or incomplete to be rectified;

- right to erasure - the right to ask for your personal information to be erased in certain circumstances;
- right to restriction of processing - the right to ask for the processing of your personal information to be restricted in certain circumstances;
- right to object to processing - the right to object to the processing of your personal information in certain circumstances;
- right to data portability - the right to ask that personal information you gave The SU be transferred to another organisation, or to you, in certain circumstances;

To exercise any of the rights above an individual should complete an online subject access request form.

The online form will ask the requester to:

- provide a scanned copy of their ID card for verification purposes;
- indicate from a list provided what personal data they want to be provided with;
- indicate a timeframe they want us to carry out this request for;
- indicate which data subject rights they wish to exercise.

A request will be actioned within one month of confirmation of the subject access request form being received. If longer than a month is required to fulfil a request the individual must be informed of the reason.

Where an individual chooses to view, access or be provided with a copy of their personal data The SU may be required to redact personal data belonging to third parties (*students, members of public or other organisations*).

If personal data is to be provided to an individual it will be password protected and this will be given at a meeting (*in person or online*) so as to visually confirm that the individual matches the ID card.

The SU will keep a record of the request, any information given and emails exchanged with the requester.

Cookies

A 'cookie' is a small piece of information that is placed on a computer when it visits certain websites.

The SU uses the following types of cookies:

- Functionality cookies: these are required in order for the website to function;
- Analytics cookies: these are used to anonymously remember a device when it visits the website allowing tracking of browsing patterns in order to help build a profile of how the website is used.

By law, The SU must provide website users with the following information about the cookies used and ask them by way of a pop-up message to 'opt in' to using these cookies.

FUNCTIONALITY COOKIES		
Cookie type	Purpose	Expires
ASP.NET_SessionID	Stores a temporary unique identifier for your session – no other information is stored.	Exit of browser
ASPXAUTH	When logged in, this cookie stores an encrypted value which identifies a person to the site and can only be read by the server. If the Remember Me function is used this cookie remains on a computer for 3 months.	Exit of browser or 3 months
AntiXsrfToken	Implements a preventative mechanism against Cross-Site Request Forgery attacks (see here for further details)	Exit of browser
NREUM	Used by New Relic (<i>performance monitoring</i>) as a work around for browsers that do not support the Navigation Timing API .	Exit of browser

ANALYTICS COOKIES		
Cookie type	Purpose	Expires
_utma	Used by Google Analytics to capture and determine unique visitors and the frequency of views. __utma is written to the browser on the first visit to a site (<i>from the browser being used</i>).	2 years
_utmb	Used by Google Analytics to establish and continue a session on the site. Each time a page is visited it is updated to expire in 30 minutes.	30 minutes
_utmc	Previously used by Google Analytics javascript to define a session status.	6 months
_utmz	Used by Google Analytics to store the type of referral used to reach the site; e.g. direct, link, web search, etc.	Exit of browser
COOKIE_OK	This is the cookie that stops the opt-in message (<i>for cookies</i>) appearing each time an individual visits the site.	Permeant

In addition to the above the website may contain third party cookies that have been placed within advertisements by advertisers for analysis purposes. These are anonymous and cannot identify individuals.

If an individual wishes to remove cookies from their browser they can find out how do this by visiting www.aboutcookies.org for more information.

Making a complaint

If an individual has any concerns about The SU's use of personal information, they can make a complaint to The SU in accordance with the complaint's policy by emailing su-cda@bath.ac.uk.

They can also complain to the ICO if they are unhappy with how The SU has used their data.

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Telephone number: 0303 123 1113

Website: <https://www.ico.org.uk>