

Bangor University Students' Union

Student Data Privacy Statement

1. Introduction

While carrying out its various functions and activities, Bangor University Students' Union collects information from individuals and external organisations and generates a wide range of data which is recorded and maintained.

Bangor University Students' Union is the data controller in relation to your information, as defined in the Data Protection Act 2018 and is committed to protecting your rights, in line with the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR).

This statement explains how Bangor University Students' Union (hereinafter referred to as "the Students' Union") handles and uses your personal information during your time as a student. The Students' Union is committed to protecting your personal information and to being transparent about what information it holds.

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.

2. What information do we collect about you and where we collect it from?

2.1. When you become a member

When you enrol at Bangor University, the University will share your data with the Students' Union where it is necessary for the pursuit of the legitimate interests of the Students' Union or yourself, in order to take part in democratic processes, benefit from representation services, join sports clubs and societies and receive communications. You will automatically become a member of the Students' Union at enrolment. Where consent has been provided, the University will also share ethnicity data to enable the Students' Union to monitor and promote BME engagement. A data sharing agreement governs this process which facilitates the University's obligations under section 22 of the education Act 1994, which can be found here -

<https://www.bangor.ac.uk/planning/information-sharing.php.en>

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, our by-laws can be found here

<https://www.undebbangor.com/voice/gm/papers/>

2.2. When you give it to us directly

You may give us your information in order to sign up to a club, society, volunteering project, 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 Bangor University or companies we pair up with such as Payment companies. 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*

We may combine information you provided to us with information available from external sources. This will allow us to gain a better understanding of our members to improve our services to you.

3. 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 are a means of storing information about you and your preferences on the hard drive of the computer you are using. 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.

The 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.

3.1 Session-based cookies

Session based cookies are deleted when you close your browser. Two cookies that are strictly necessary for functioning the logged in site are the 'Session ID cookie' and the 'Aspxauth cookie', both as session-based cookies, unless you choose for the session to save your details, then the information will be held for three months. The other session-based cookies;

- Implement a preventative mechanism against Cross-Site Request Forgery attacks
- Measures overall time to load the entire webpage.
- Store the type of referral used to reach the site (Used by Google Analytics)

3.2 Persistent cookies

A persistent cookie is more likely to collect a greater amount of personal information, such as browsing behaviour if so-configured, and is deleted manually or on its expiration date.

Our persistent cookies are used by Google Analytics to

- capture and determine unique visitors and the frequency of views (expires after 2 years)
- Establish and continue your session on the site (expires after 30 minutes)

4. What happens when you buy a product from us

To place an order with us online you will need to login on our website using your student login; this means that your transaction is linked to the details we hold on you (see section 5). 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/ready for collection. Should we need to contact you for any reason regarding your order, we will use the email address linked to your account, or the telephone number where provided. If you visit our physical shop in the students’ union building you will be asked to provide your name and student number which allows us to track products you’ve purchased to provide better customer service standards and develop the product range we offer to students.

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

If you are a student at Bangor University and therefore a member of the students' union, the following student information you provide at enrolment will be shared with us by the University:

- Student Number (500 number)
- Username
- Full Name
- Department
- Programme and Part
- Predicted Leave Date
- Programme Level
- Date of Birth
- Gender
- Nationality
- Home Address
- Term Address
- University Email Address
- Home Email Address
- Mobile Telephone Number
- Emergency Contact Details
- Language Choice

This then allows us to give you the best possible service and excellent levels of administration and communication. In addition, when you attend an event, join a student group or use one of our services, we may ask for additional information such as: "Personal Information" which identifies you and enables you to be contacted. We will also ask for information about your course or regarding your health if you are participating in an activity for which we insure you (e.g. Sport, Societies); we may ask you for next of kin details for emergency contact only, and for details of any medical conditions that might affect your participation in the activity that could put you or others at risk.

We will use the information for the following purposes:

- To administer your membership of the Students' Union.
- To administer the services and activities of the Students' Union, such as Sports Clubs, Societies, Volunteering projects and Course Reps.
- To run democratic elections
- To carry out research on the demographics, interests and behaviour of our registered members.
- To send you email newsletters from the Students' Union and details of student events
- To improve the content of the Students' Union website
- To perform marketing and promotional activities.
- To forward information to you which we feel you may find useful, such as details of products services, events and forthcoming employability opportunities.

- Verification of student identity

We may pass your personal information onto the organisers of Sports Clubs, Societies or other services of the Students' Union, which you choose to join.

We also collect anonymous information for statistical purposes. Any anonymous information is not linked to your personal information and cannot be used to identify you.

If you make a purchase on our website, you will be asked to provide debit/credit card details. This is processed externally by our Payment Company Sage Pay.

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.

6. 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 contractors 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 contractors.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors. We would only share your data in other circumstances if we have your explicit and informed consent.

7. Marketing and Communications

Personal details relating to each student are shared by the University with the Students' Union to ensure you can vote and access Students' Union services. This enables the University to fulfil its obligation to support the operation of the Students' Union. The transfer of information between BU and the Students' Union is specifically noted in the University's Data Protection Statement.

Unless you have opted out, occasionally throughout your time at the University the Students' Union will communicate with you via email. This will be for the main purpose of communicating services provided solely by the Students' Union in line with the students' membership. If you would like to be removed from a mailing list you can opt out of that type of communication using the unsubscribe link provided in the email. You can edit and view your contact details by logging into the website and going to the right-hand corner of the screen.

8. Sharing Data with Partners

Your data is only shared with external agencies upon legitimate request and/or when required by law such as a court order.

The Students' Union has no responsibility for the management of personal data processed by Bangor University, which is solely responsible for its own compliance with data protection legislation. The University's nominated representative for data protection legislation, and the Data Protection Officer is Head of Governance and Compliance, Gwenan Hine gwenan.hine@bangor.ac.uk.

The Students' Union reserves the right to share limited information with Bangor University as necessary to pursue its legitimate interests, or to ensure the smooth operation of procedures and practices in the interests of students. Specific information shared with the University, and its' purpose, is detailed in our sharing agreement which is published online.

Further to this, the Students' Union reserves the right to pass necessary information (including personal data) to the University in exceptional circumstances, such as to uphold and enforce disciplinary procedures.

Every year we send an e-mail out to all graduating students explicitly asking permission to pass on information to Bangor University's Alumni Department. Students can opt out of the process; any students who chooses to opt out will not be a part of the selection we send over to the Alumni Department. We inform the alumni office of any Clubs and Societies the students (who have not opted out) have been involved with, along with the contact details of the students, which they provided to the University upon registration.

A third party 'Memberships Solutions Limited' (MSL) provide an information management system to store and manage our students' personal information. MSL are bound by a contract stating that personal information will not be modified, deleted, or shared, without the instructions of Bangor Students' Union, or used for any purpose other than that specified by the Students' Union. They are also contractually obliged to abide by current data protection legislation.

9. 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.

10. 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 Bangor University unless you have used a service where it has been explained to you that this could be longer.

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.

11. 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.

12. 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. Contact mair.rowlands@undebbangor.com if this is the case. 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.

13. 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 - mair.rowlands@undebbangor.com