



# STUDENT PRIVACY NOTICE:

## HOW WE USE YOUR PERSONAL INFORMATION AT CAMBRIDGE SU.

This document provides information about the use of your personal information by Cambridge SU, whether this is as part of a single survey, an ongoing campaign, use of our Student Advice Service or participation in SU elections and activities. Cambridge SU defines "personal information" as any information which relates to, or identifies you, as an individual in line with the Data Protection Act (1998) and will also sometimes capture "sensitive information" as shown below:

Contact details	Personal Information	Sensitive information
First Name Last Name CRSid Mobile Phone number Email Address	Age Range - (under 18, 18-24, 25-35, 36+) College Gender Nationality Year of Study Mode of Study Student Type (level of study) Study Status Course Name Department Name Faculty Name Expected course end date Bank Details History of purchases Subject matter of any advice requested from the Student Advice Service	The Data Protection Act defines sensitive personal data as; Racial or ethnic origin Political opinions Religious beliefs Trade union membership Physical or mental health Sexuality Criminal offences We may record and process this information through <ul style="list-style-type: none"> <li>• Student Group Membership</li> <li>• Campaign groups</li> <li>• Employment records</li> <li>• Student Advice Service Records</li> </ul>

Cambridge SU ("we", "our" or "us") promises to respect any personal data you share with us, or that we get from other organisations, such as the University of

Cambridge, and keep it safe. We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect. As a membership-led organisation, data regarding our members helps ensure students are always kept at the heart of our work.

The information published here applies to the use, sharing and disclosure of your personal information by Cambridge SU. Cambridge SU is a separate legal entity from both the [University of Cambridge](#), and each of the 31 Cambridge Colleges for these purposes. The University and your College will provide you with its own statement setting out how it will use, share and disclose your personal information while you are a student.

## WHAT IS THE PURPOSE & LEGAL BASIS OF PROCESSING STUDENT DATA?

Cambridge SU will process your personal information for a range of contractual and internal purposes, including the following:

- to represent your interests as a student of the University of Cambridge in accordance with the Union's constitution and democratic functioning;
- to provide, run and coordinate activities and facilities to you (e.g. student campaigns, member services, Student Advice Service etc.);
- to enable your participation in organised activities and events (e.g. student schemes such as the Shadowing Scheme; attendance at training, forum or social events organised for you to attend; society stands at Fresher's Fair; participation or attendance at Student Council meetings; etc.);
- to communicate effectively with you (predominantly via email and online/via digital means), including the distribution of relevant [e-]newsletters, memos and circulars, and notice of student elections and campaigns;
- to gauge member satisfaction and gather feedback, operate security (including CCTV), deal with complaints and issues, and for monitoring purposes;
- to support your training, medical, safety, welfare and religious requirements; and
- to compile statistics and conduct research for internal reporting purposes.

We consider the processing of your personal information for these purposes to be either necessary for the performance of our contractual obligations with you (e.g. to manage your student experience and welfare while studying at Cambridge), or necessary for compliance with a legal obligation (e.g. equal opportunities monitoring), or necessary for the performance of tasks we carry out in the public interest (e.g. Widening Participation activities, representation of student interests to the University), or necessary for the pursuit of the legitimate interests of Cambridge SU or an external organisation (e.g. to enable your access to external services).

We will not use your personal information to carry out any wholly automated decision-making that affects you<sup>1</sup>. We will ensure that:

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<sup>1</sup> Automated decision making is the ability to make decisions without human involvement. In practice, profiling can often be a precursor to automated decision making. 'Profiling' is a form of automated processing of personal data used to analyse or predict matters relating to an individual.

- data is kept safe and secure;
- data is handled legally, responsibly, and ethically;
- we are open and transparent about what data we are using and why; and
- all legal requirements are met regarding data privacy.

## HOW AND WHERE WE COLLECT PERSONAL INFORMATION

We collect information in the following ways:

1. When you give it to us INDIRECTLY (i.e. you become a MEMBER). Each year that you enrol on a University of Cambridge accredited course you automatically become a member of the Cambridge SU, unless you opt out during enrolment. When you applied to become a student you were told [how the University and the relevant College\(s\) would use your personal information to process your application and for related purposes](#). The University has its own notice for students detailing its protocols for managing your privacy. The University of Cambridge provides Cambridge SU with a direct feed of student data which creates our register of members which includes information about you and your course. When the University gives us this data we become responsible for it and will use this as our core central record of your membership.
2. 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, undertake research activities, 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 against our register of members. By joining student groups, this may tell us something about your personal lifestyle that would constitute sensitive personal data as defined by the Data Protection Act. When we seek to obtain information for a specific campaign, cause or survey, which aims to solicit student opinion, we will seek your consent at the point of collection (which you can withdraw at any time); this will detail the purposes that this data will be used for. However, this data may also be used for equalities monitoring and student welfare, and as this processing is in the course of the official duties of Cambridge SU, the law does not require your consent for us to use your data in this way. However, your data will not be processed in such a way as to make you as an individual identifiable to any external or unauthorised parties, except where your explicit consent is given.
3. Depending on your social media settings or the privacy policies for social media and messaging services like Facebook or Twitter, you might give us permission to access information from those accounts or services.

4. Depending on your app settings, you might give us permission to access information from your device if you opt to download the Cambridge SU app.
5. Information available publicly such as information found in places like Companies House and/or information that has been published in articles/newspapers.
6. Like most websites, we use analytics and “cookies” to help us make our site - 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 (or phone or tablet). They make interacting with a website faster and easier - for example by automatically filling your name and address in text fields. In addition, 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, including what type of device it is, what specific device you have 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. Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website<sup>2</sup>.
7. To place an order through our e-shop, membership is required. In order to process your order and notify you of its progress, we request certain information including your name, delivery address and email address. Once an order has been placed, we may contact you by email to confirm your order details and again once your order has been accepted and despatched. 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 may also ask if you will provide us with your Single Sign-On when you shop in store, this allows us to track the products you purchase, provide better customer service standards and develop the product range we offer to students. In store you are under no obligation to provide us with this information.

## WHAT PERSONAL DATA WE COLLECT AND HOW WE USE IT

Cambridge SU will keep a record of the information you submit in the course of participation in any of its activities and/or with its personnel: such as any given survey, campaign-orientated or consultative exercise, involvement in any schemes or outreach programs, correspondence, or use of Cambridge SU services and facilities. We will keep a record of the details you provide in these instances, as well as any supplementary personal information from the University regarding your College, course, or student status. This personal information may include data such as your name, equality and diversity data, course studied and involvement in

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<sup>2</sup> We cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy and cookie statement. You should exercise caution and look at the statements and policies applicable to the website in question.

the activities of Cambridge SU. The type and quantity of information we collect and how we use it depends on why you are providing it. If you are one of our members the University, in response to their obligations to you, provide us with a set of key information you provided at enrolment. 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 group 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
- Your bank details to facilitate payments (if relevant)
- Any disabilities or access requirements so that we can provide assistance where needed

The University will include your basic contact details in their internal online directory, [Lookup](#), though you can opt out of this. You may also choose to include your email address in our external online directory, [Jackdaw](#). Cambridge SU is able to access these directories and, in order to undertake its legitimate activities as a Students' Union, may cross reference existing data it legitimately processes with personal information from these directories.

## **IMPORTANT - Student Advice Service**

Sensitive personal data is recorded on the Student Advice Service Monitoring form. Completing this form is not a requirement for accessing the service, and this is clearly indicated on the form.

This data may also be used for equalities monitoring and student welfare, and as this processing is in the course of the official duties of the service, the law does not require your consent for us to use your data in this way. However, your data will not be processed in such a way as to make you as an individual identifiable to any external or unauthorised parties, except where your explicit consent is given.

## **HOW LONG WILL MY DATA BE KEPT?**

Any information that you submit to Cambridge SU, or that was otherwise collected, is kept for a period of seven years, or longer dependent upon the use of your data as outlined at the point of collection such as the use of multi-year statistics in order to inform campaigns and initiatives. Anonymised forms of your data may be kept beyond this.

## **TARGETING COMMUNICATIONS FOR MEMBERS**

Where you have given us consent we use profiling and screening techniques to ensure communications are relevant and timely, and to provide an improved

experience for our members. Profiling also allows us to target our resources effectively, which members consistently tell us is a key priority for them. 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 would only ever be analysed or profiled through encrypted and protected data processes, which only ever identifies broad statistics. In doing this, we may use additional information from third party sources when it is available.

## ADJUSTING YOUR MARKETING & COMMUNICATIONS PREFERENCES

As a member we believe 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. You may opt out of these communications at any stage by clicking the unsubscribe link contained within the email or updating your contact preferences through the Cambridge SU website. Our forms have clear marketing preference questions and we include information on how to opt out when we send you marketing. If you don't want to hear from us, that's fine.

As a charity we need to fundraise to provide the services we offer to University of Cambridge students. Occasionally we will send marketing material, such as solus emails, to our members where you have told us that we can. We do not sell or share personal details to third parties for the purposes of marketing.

### Keeping your information up to date

We mostly use the record of members provided by the University of Cambridge to maintain accurate data about you as described above. We really appreciate it if you let us know if your contact details change.

### 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. Cambridge SU has both a Student Privacy Notice (this document) and Data Security Policy which is supported by a practical handbook for our employees and volunteers. All employees and volunteers handling data are required to undertake annual GDPR training and third parties handling data are required to provide a contract which meets the requirements of the Information Commissioner's Office. The Students Union does not store any sensitive card data on our systems following online transactions. The Union utilises payment processors SagePay, Paypal and Stripe alongside ecommerce experts MSL to handle these matters. Cambridge SU uses MSL as its website provider.

## HOW WE KEEP YOUR DATA SAFE AND WHO HAS ACCESS

Your personal information is created, stored and transmitted securely in a variety of paper and electronic formats. Access to your personal information is limited to Cambridge SU employees who have a legitimate interest in this data collected for the purpose of carrying out their contractual duties and under strictly controlled conditions the following groups where necessary:

- Contractors
- Advisors
- Agents
- 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. We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors. Some of our suppliers run their operations outside the European Economic Area (EEA). For example, we may engage a secure email client or research platform to undertake our service and as such we may need to share your information. 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. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the 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.

### **IMPORTANT - Student Advice Service**

The Student Advice Service do not share your data with individuals beyond the service unless (i) you ask us to do so or (ii) there is a serious and imminent risk to your own or to other's safety, or when we are legally obliged to do so, or (iii) with your separate and clear consent.

In the course of its legitimate activities, the Student Advice Service may share your information with service-providers contracted to support its operations. For example, the Student Advice Service engages the services of a confidential case management system (Student case Manager as provided by MSL). Other than as set out above, we will not normally publish or disclose any personal information about you to other external enquirers or organisations unless you have requested it or consented to it, or unless it is in your vital interests to do so (e.g. in an emergency situation).

On your first contact with the service, we create a confidential secure electronic file that will contain the personal information we process as part of the service, for example: a copy of the Registration form, a copy of the Monitoring form, any email correspondence we have had with you, notes of sessions or meetings we have attended with you, any other contact or correspondence you have with the Service, or contact with others on your behalf. Having a complete account of your involvement with us helps us to support you as a user of our Service.

We also record how you found out about the Student Advice Service and whether or not you would like to be invited to take part in the anonymous feedback and impact surveys. We may also supplement personal information from you with information made available by the University and Colleges.

The information is held on a confidential case management system (Student Case Manager). All access to the confidential case management system is password protected and limited explicitly to the individuals who work within Cambridge SU to support the legitimate activities of the Student Advice Service for the purpose of carrying out their role in providing advice and support to you.

We also use data to compile anonymous statistics about the use of the service, for research purposes, equalities monitoring and to identify trends and patterns that may contribute to the Unions' mission to improve the student experience at the University of Cambridge. This data is held securely on the Cambridge SU file server in a confidential folder with access limited to Student Advice Service staff members. All access to the Cambridge SU File Server is password protected.

Our use of your personal information will not be excessive or unwarranted.

## YOUR DATA RIGHTS

You have the right to access the personal information that is held about you through a "Subject Access" request by Cambridge SU. You also have the right to ask us to correct any inaccurate personal information we hold about you, to delete personal information, or otherwise restrict our processing, object to processing or to receive an electronic copy of the personal information you provided to us. For details on how to do this, please contact [info@cambridgesu.co.uk](mailto:info@cambridgesu.co.uk)

### What happens to a subject access request?

On receipt of all relevant documentation, the Data Controller will contact the appropriate departments to obtain the data. In order to locate the correct information the Data Controller may ask the person making the request to give an indication of the types of data they wish to see, to what activity the information might relate (being a member of a student's group, employment, ticket purchase) and where they believe the data is being stored.

2. The Data Controller will consider the rights of third parties who have contributed information to the individual's file(s). If possible, third parties will be anonymised prior to the information being released, if this is not possible, the consent of the third party to release the information to the person making the request will be sought. Where consent cannot be obtained or is refused, the Data Controller will consider whether it is reasonable to release the information in accordance to the Data Protection Act. Some kinds of information are exempt under the Data Protection Act.

3. Where appropriate, the information will be released to the person making the request. All requests will be dealt with within 40 calendar days of the receipt of the request.



## Opting out of membership

If you want to opt-out of all communications and data processing you will be required to surrender your membership to Cambridge SU which will limit your access to activities and services. If you have any questions please send these to [info@cambridgesu.co.uk](mailto:info@cambridgesu.co.uk).

## Complaints

If you are not happy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF. For further information see the Information Commissioner's guidance [here](#).

## REVIEW OF THE STUDENT DATA & PRIVACY NOTICE

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 [info@cambridgesu.co.uk](mailto:info@cambridgesu.co.uk).