



## DATA PROTECTION POLICY: CONSUMER

### INTRODUCTION

This policy provides information about the use of your personal information by Cambridge SU, whether this is as part of a single survey, an ongoing campaign, or participation in Cambridge SU activities more widely.

Cambridge SU ("we", "our", "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 do anything you wouldn't reasonably expect. Cambridge SU defines 'Personal Information' as any information which relates to or identifies you as an individual.

Facilitating our legal requirements, organisation policy and services to our customers (consumers) through using your personal data allows us to make better decisions, communicate more efficiently and, ultimately, ensure you receive the services required. 'Consumers' refers to members who engage with Cambridge SU to purchase products or items such as society memberships, event tickets or sales at our shop.

### HOW WE COLLECT AND PROCESS YOUR PERSONAL INFORMATION?

Cambridge SU engages with you in a number of ways in the course of its legitimate activities as a students' union. In the course of your Interaction with Cambridge SU your data may be retained, and where this occurs, Cambridge SU will be able to demonstrate a legal basis for doing so and will, wherever required, inform you of its collection. This page outlines how Cambridge SU processes data and aims to notify you of how your data is processed. In addition to the information published here, when you use specific activities and facilities offered by Cambridge SU, you will be told about any other uses of your personal information for that specific purpose, where consent is required.

## WHO WILL PROCESS MY PERSONAL INFORMATION?

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 (<https://www.cam.ac.uk/>), 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.

## WHERE WE COLLECT INFORMATION ABOUT YOU FROM

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 purchase or transaction, given survey, campaign-orientated or consultative exercise, involvement in any schemes or outreach programs, correspondence, or use of Cambridge SU services and facilities. Cambridge SU will keep a record of the details you provide in these instances, as well as any supplementary personal information from the University.

To place an order with us online, registration is required. At the point of registration, we request certain information which is required to enable us to process your order and notify you of its progress. If you are a student, we may also ask if you will provide us with your Student ID number and date of birth when you shop in store. When purchasing products in person, we may take your name, college, email and Cambridge identifier to assist with the processing of the sale.

The type and quantity of information we collect and how we use it depends on why you are providing it. In registering as a customer we will ask you to provide us with the following personal information:

- Student ID
- College
- Name
- Address
- Email
- Telephone number
- Date of Birth (required for online verification)

We will mainly use your data to administer our contracted duties with you and to send you carefully selected information about our products and services.

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.

Your personal information is created, stored and transmitted securely in a variety of paper and electronic formats.

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 transaction), or necessary for compliance with a legal obligation (e.g. to maintain financial records), or necessary for the performance of tasks we carry out in the public interest (e.g. membership activities for students at Cambridge), 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:

- 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.

## WHO WILL MY PERSONAL INFORMATION BE SHARED WITH?

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 relating to the legitimate charity activities of the students' union. Our use of your personal information will not be excessive or unwarranted. We do not give out any of your details to third-parties for the purpose of marketing or solicitation.

In the course of its legitimate activities as a students' union, Cambridge SU may share your information with service-providers contracted to support its operations. For example, Cambridge SU may engage the services of an email client to process its email; may utilise online storage services; or may engage in services that help to securely manage sensitive datasets such as mailing lists or survey data. In the course of engaging with any third party services your data will only ever be shared for legitimate administrative purposes and for Cambridge SU's own legitimate activities; your data will never be sold to third parties and strict contractual provisions will be in place, along with internal management controls, to ensure contracted services facilitate Cambridge SU's legitimate use of your data only.

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. In the course of informing university-wide campaigns Cambridge SU may share your information with either the University or individual Colleges, especially concerning matters of your welfare<sup>2</sup> or for monitoring purposes.

When matters concerning the well-being of a specific student arise, you may be identified to a College or the University, but only when this is necessary for the health or safety of an individual (such as for law-abiding purposes). On occasion,

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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 form of automated processing of personal data used to analyse or predict matters relating to an individual.

<sup>2</sup> Cambridge SU is only able to share the data it collects (e.g. via correspondence, or its daily activities), and only obligations to the law or safety of individuals shall necessitate a conflict to confidentiality expressed during collection.

the above types of sharing may involve the transfer of your personal information outside the European Economic Area (e.g. to facilitate your participation in an activity, or to utilise a secure administrative service for Cambridge SU's day-to-day activities). Such transfers usually are necessary in order to meet our legal or contractual business obligations, and are carried out with appropriate safeguards in place to ensure the confidentiality and security of your personal information.

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).

## HOW LONG IS MY INFORMATION 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. If you use the Student Advice Service, your information is retained for seven years after your last use of this service (this is covered in the SAS privacy policy), unless you ask for it to be deleted before this.

## HOW CAN I ACCESS MY PERSONAL INFORMATION?

You have the right to access the personal information that is held about you by Cambridge SU through a 'Subject Access' request. 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@cusu.cam.ac.uk](mailto:info@cusu.cam.ac.uk).

If you have any questions about how your personal information is used, or wish to exercise any of your rights, please contact [info@cusu.cam.ac.uk](mailto:info@cusu.cam.ac.uk).

## HOW DO I COMPLAIN?

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 (<https://ico.org.uk/>).