



DATA PROTECTION POLICY: NON-STUDENT PARTNER

INTRODUCTION

This policy outlines the use of your personal information by Cambridge SU, whether this is as part of our representative work on behalf of students at the University of Cambridge and its constituent Colleges; part of the Union's wider engagement with stakeholders as part of its charitable activities in pursuit of its purposes, or as a part of our service-delivery to students.

Cambridge SU ("we", "our", "us") promises to respect any personal data you share with us, or that we get from the university, 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 that relates to or identifies you as an individual.

Facilitating our legal requirements, organisation policy, representation of students and services to our students, suppliers, contractors and clients through using your personal data allows us make better decisions, communicate more efficiently and, ultimately, ensure you receive the services required. 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 document outlines how Cambridge SU processes data and aims to notify you of how your data is processed.

NON-STUDENT PARTNER DATA

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 policy outlines how Cambridge SU processes data and aims to notify you of how your data is processed.

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 product, programme or offer, 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.

Cambridge SU may also process your personal information that it gathers from your employer, public sources or from documentation or correspondence or records shared with us. For example, Cambridge SU will retain minutes from meetings, or glean contact details from websites, in order to advance its goals as a union for students. Cambridge SU processes this information about you as part of its representative and campaigning and lobbying work on behalf of students at Cambridge in the advancement of its charitable objectives.

Your personal information is created, stored and transmitted securely in a variety of paper and electronic formats. We will use standard programs, such as email clients and widely known public data storage platforms and secure internal digital file stores; and sometimes we may use customer relationship management or emailing platforms and accounting software, to assist in the processing of your information. Our use of your personal information will not be excessive or unwarranted.

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 THIS INFORMATION?

The information published here applies to the use, sharing and disclosure of your personal information by Cambridge SU, its personnel and its volunteers. 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.

WHAT PERSONAL INFORMATION WILL BE PROCESSED?

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 meeting (e.g. committee meeting), event, publication, survey, campaign-orientated or consultative exercise, involvement in any schemes or organised 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 sources made available, or shared with us, by your employer. This personal information may include data such as your name, email address (work or home depending on which you share), position in your organisation/company and job title/role, work address, telephone, work history as far as that which is made available to the charity, history of decisions made

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that relate or could relate to the interests of students at the University of Cambridge, and involvement in the activities of your employer, Cambridge SU or details of the capacity in which you are of interest to the students at the University of Cambridge. For avoidance of doubt, the charity may use your personal information to identify your likelihood to align with current or ongoing agendas of the students' union, which itself may inform its plans for promoting student interests at the University.

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 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.

The University may include your basic contact details in their internal online directory, Lookup, though you can opt out of this (<https://www.lookup.cam.ac.uk/>). You may also choose to include your email address in their external online directory, Jackdaw (<https://jackdaw.cam.ac.uk/mailsearch/>). 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

WHAT IS THE PURPOSE AND LEGAL BASIS OF THE PROCESSING?

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

- to represent the interests of students 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 and students and prospective students (e.g. student campaigns, member services, Student Advice Service etc.);
- to enable students' and Young Persons' participation in organised activities and events (e.g. student schemes such as the Shadowing Scheme; attendance at meetings or events organised for students to attend; society stands at Freshers' Fair; etc.);
- to communicate effectively with you (predominantly via email and online/via digital means), including the distribution of relevant [e-]newsletters, memos and circulars, where the agendas and interests of students at Cambridge may be of interest to you or the role for which you are employed;
- to gauge your views and satisfaction and gather feedback, operate security (including CCTV), deal with complaints and issues, and for monitoring purposes; and
- to compile statistics and conduct research for internal reporting purposes.

When we seek to obtain information for a specific campaign, cause or survey, which aims to solicit your 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. 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.

We consider the processing of your personal information for these purposes to be either necessary for the performance of our contractual obligations with students (e.g. to manage their student experience and welfare while studying at Cambridge), or necessary for compliance with a legal obligation (e.g. retaining financial or legal records), 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. in the conduct of committee business at the University of Cambridge or meeting public representatives).

We will not use your personal information to carry out any wholly automated decision making that affects you¹. 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 DATA BE SHARED WITH?

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.

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 student welfare². When matters concerning the well-being of a specific student arise, you may be identified to your employer, but only when this is necessary for the health or safety of an individual (such as for law-abiding purposes) or as part of statutory obligations concerned students or their education experience.

As described above, your personal information is shared with relevant staff at the Cambridge Colleges as required and with the University. In addition, it is shared as

¹ 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.

² 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.

permitted or required by law, on a considered and confidential basis, with a range of external organisations, which may include the following where necessary for legitimate processing:

- external individuals involved in relevant Cambridge SU committees or procedures;
- relevant Higher Education bodies (e.g. Office for Students, Office of the Independent Adjudicator, National Union of Students, the organisation(s) running the National Student Survey and other student and leaver surveys);
- on occasion and where necessary, the police and other law enforcement agencies;
- on occasion and where necessary, independent auditors or Government taxation agencies;
- on occasion and where necessary, subsidiary companies of the University;
- companies or organisations providing specific services to, or on behalf of Cambridge SU, the University and/or one or more Colleges; or
- the providers of any external/collaborative learning and training placements or opportunities.

On occasion, 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 your information is processed as part of activities of the Student Advice Service, your information is retained for seven years after your information last becomes directly relevant to an ongoing particular case.

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.

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.

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/>).