|  |
| --- |
| Privacy Policy2022 |
| **September 2022** |

Contents

[Summary 4](#_Toc117516075)

[Purpose 4](#_Toc117516077)

[Statement 4](#_Toc117516079)

[What information do we collect 4](#_Toc117516081)

[People who are neither staff nor students 4](#_Toc117516082)

[Staff Data 4](#_Toc117516083)

[Student Data 5](#_Toc117516084)

[Who is the information shared with? 6](#_Toc117516085)

[Research Accountability 6](#_Toc117516086)

[Storing your Personal Data 7](#_Toc117516087)

[Cookies 7](#_Toc117516088)

[How do we use the information we collect? 8](#_Toc117516089)

[Access to your personal data 8](#_Toc117516090)

[Changes to this Policy 8](#_Toc117516091)

[Annex 1 9](#_Toc117516092)

[How and why we are processing your personal data and your legal rights 9](#_Toc117516093)

[Legal basis for processing 10](#_Toc117516094)

[Health and safety: 10](#_Toc117516095)

[Prevent Strategy functions 11](#_Toc117516096)

[Research 11](#_Toc117516097)

[Change History Record 12](#_Toc117516098)

[Endmatter 12](#_Toc117516099)

# Summary

# The University collects, holds and processes student information. So as to manage its operations effectively, it is vital that the University processes this information. The Privacy Policy details how personal data of students enrolled at Edge Hill University is processed fairly and in compliance with current UK Data Protection legislation. Privacy Notices explain exactly what the University does with personal data and individuals rights concerning that processing.

# Purpose

# Edge Hill University regards your privacy as important and comply with the principles of the current and changing Data Protection legislation. This policy provides an overview of how your data may be collected and how it is retained. Please note, some departments inside of the University may collect and use data differently. These departments will have a departmental Privacy Notice explaining these practices

# Statement

## This privacy statement applies to all University websites that link to this page. Please note that some sites related to the University may collect and use data differently. These sites will have a local privacy notice explaining these practices. If the user leaves the University website and visits a website operated by a third party, Edge Hill University cannot be held responsible for the protection and privacy of any information that users provide when visiting such third-party websites. Accordingly, users should exercise caution and review the privacy statement applicable to the website in question.

# What information do we collect

## People who are neither staff nor students

The University needs to hold and process personal data relating to many people in order to maintain proper records, provide advice and guidance to the public and to provide goods and services. We hold financial information so that we may process payments; information on health and disability so that we can provide support and assistance to visitors and guests; and many other categories (See Annex 1) of information in order to both run the business and activities of the University, and in order to fulfil our legal obligations.

## Staff Data

The University needs to hold and process personal data relating to staff in order to maintain proper records, provide support and guidance to staff and monitor pensions and payroll, performance and contractual obligation. Financial information is held to enable paying staff salaries and expenses; information on health and disability for statutory return purposed and so that adequate support can be offered. See Annex 1 for details of additional categories of information processed in order to both run the business and activities of the University, to help and support staff and in order to fulfil our legal obligations.

## Student Data

The University needs to hold and process personal data relating to its students in order to keep proper records, provide support and guidance to students and monitor academic progress. We hold financial, sponsorship and fees data so that we can invoice students correctly and record payments; information on health and disability so that we can properly support students; academic information so we can track progress and provide appropriate learning and teaching support and opportunities; and many other categories of information – which are listed below – in order to both run the business and activities of the University, to help and support students and in order to fulfil our legal obligations.

In addition, the University needs to hold and process personal data relating to those seeking to become students (prospective students and applicants), in order to support and guide prospective students, assess academic suitability for admission, and facilitate the admission process, including assessing fee status and, for International students, arranging the CAS number used in visa applications. We also hold data on prospective students' socio-economic and family background to support the University's mission to widen access to higher education and responsibilities relating to the Office for Students.

When you visit and use our website, products and services, we may collect data or ask you to provide certain data, including personal data. “Personal Data” is any data relating to an identified or identifiable individual.

The personal data we collect might include the data that you give to us, including your name, date of birth, address and email address. There is also data that is automatically collected when you use the site, this is not collected to identify you, but instead collected so we can find ways in which we can improve our website and identify how many users we had on the site on that day.

Examples of the data that is automatically collected include IP address, domain name, language and information regarding what pages are accessed at particular times. Examples of when information is gathered include:

• Signing up for newsletters

• Requesting a prospectus

• Registering for open days;

• or if you are a member of staff or a student who use our portal.

## Who is the information shared with?

When you provide us with your personal data, we will only use it for the reason you provided. This data will not be shared with a third party unless you are informed that this will happen, and you agree. The University may disclose appropriate personal data, including sensitive personal data, to third parties, where there is legitimate need or obligation, during or after your period of study including but not restricted to, partner institutions; insurance brokers; agents and suppliers; debt collection agencies and auditors. Such disclosure is subject to procedures to ensure the identity and legitimacy of such agencies.

The University will also use your data, together with data about other current and former students, to carry out statistical analysis in relation to its student population or for historical or research purposes (but not to make decisions about you).

The University is sometimes required to take part in surveys or research conducted by or on behalf of Government departments, executive agencies, non-departmental public bodies or Higher Education bodies relating to individuals who have graduated from or left the University. If so, your contact details will be shared with the organisation carrying out the survey or research on behalf of the University.

## Research Accountability

Data controllers must be able to demonstrate they are complying with the data protection principles and other requirements of the UK GDPR. It is essential therefore that researchers document any policies or procedures they adopt in order to comply with data protection requirements. Similarly, if relying on consent as the legal basis for processing, you must be able to demonstrate that the individual has consented by maintaining a record of when consent was obtained, how it was given and what the individual has been told at the time of consent. To promote accountability, a record of processing activities should be maintained as they will be subject to inspection by the ICO in the event of any security breech. These records must detail the following:

• Category of data subject: from whom the data has been collected

• Category of personal data: what type of data has been collected

• Category of recipients: what other parties the data is shared with, if applicable

• Details of any transfers to a third country: relevant to transfers outside the EU

• Time limit for erasure: if applicable

• General description of security measures

The Data Protection Act 2018 supplements the UK GDPR by stipulating that the requirement for appropriate safeguards will not be met if the processing is likely to cause substantial damage or substantial distress to a data subject or it forms the basis for decisions or measure relating to a particular individual. This condition does not apply to intervention medical research that has been approved by a NHS Ethics Committee.

Since 1 January 2021, the UK has left the European Union. This has created two significant changes with regards to data protection.

* The UK has now become a “third country” in data protection terms. The UK has been awarded an adequacy decision from the EU, meaning data transfer between the UK and the EU can continue as before. This decision will be reviewed in three years.
* The GDPR is European Union legislation. Since the UK has left the EU, the title of the legislation has changed to reflect the UK’s more withdrawn role in Europe. The legislation is now known as the UK GDPR. Whilst fundamentally the same law, it has now been altered to apply only to the UK and its local laws.

If a researcher is using a third party to collect or process personal data on their behalf [a ‘data processor’], they must have a written agreement with the third party. Researchers should seek advice form the Research Office with respect to all such agreements. In all instances, researchers should be able to demonstrate that they have proactively addressed the data protection implications of their projects, ensuring compliance with the requirements for accountability and privacy by design.

## Storing your Personal Data

All information collected is stored on our secure servers and any payment transactions will be encrypted using SSL technology. The University will adopt, where relevant, the principles of recognised international security standards, such as ISO 27001.

## Cookies

A cookie is a small piece of data (text file) that a website – when visited by a user – asks your browser to store on your device in order to remember information about you, such as your language preference or login information. Your cookie preferences can be set by selecting the Cookie Settings button on the cookie popup. Those cookies are set by us and called first-party cookies. The University also uses third-party cookies – which are cookies from a domain different than the domain of the website you are visiting – for our advertising and marketing efforts. More specifically, the University uses cookies and other tracking technologies. Additional information is available via the Cookies page at: https://www.edgehill.ac.uk/about/legal/cookies/

## How do we use the information we collect?

The personal information you give to us, is used to send marketing communications such as newsletters, information regarding open days and events. If you have requested a prospectus, the personal information such as address, is used to complete the request.

The information automatically collected when using the site (listed above) is used to:

• Review and Improve the design of the website

• Monitor and analyse the utilisation of the website

• Monitor and analyse the usage for our own demographical research purposes

## Access to your personal data

You have the right to request copies of data held about you by the University. To do so please contact dataprotection@edgehill.ac.uk. If you no longer want us to use your data or wish to amend the type of communications you receive, then you can opt out at any time via the unsubscribe link included in every email.

## Changes to this Policy

We may change this policy at any time by posting amendments to it and without the need for consultation. Please ensure you read the Policy that is in force at the time of your transaction. Any changes we make to our Privacy Policy in the future will be posted on this page.

# Annex 1

### How and why we are processing your personal data and your legal rights

#### Categories of information

* + Personal data: eg names, addresses, dates of birth, emergency contacts
	+ Educational records: eg entry qualifications, progression and achievements, extra-curricular activities
	+ Financial information: bank details, credit card information
	+ Health and Disability information
	+ CCTV images
	+ IP Addresses

#### Special data

'Special categories of personal data' are defined as information relating to the following:

* + Racial or ethnic origin
	+ Political opinions
	+ Religious or philosophical beliefs
	+ Trades union membership
	+ Genetic or biometric data
	+ Health
	+ Sex life or sexual orientation

The University may this data, but only in specific and restricted circumstances, and always in accordance with Article 9 of the GDPR

#### Sources of information

* + Provided by data subjects
	+ Agents and recruitment consultants
	+ Partner institutions
	+ Insurance brokers and suppliers
	+ Publicly available sources (eg the media)
	+ External tracing agents

#### Purposes of processing

* + Advertising and promotion of the University, its goods and services
	+ Issuing of publications
	+ Undertaking research
	+ Fundraising
	+ Awarding honorary degrees
	+ Managing accounts and records
	+ Commercial activities
	+ Security, prevention and detection of crime
	+ Health and Safety
	+ Prevent Strategy functions
	+ Debt recovery

### Legal basis for processing

The legal basis for processing (including specific General Data Protection Regulation articles):

Managing accounts and records**:**

* + Article 6(1)b: processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of a data subject prior to entering into a contract
	+ Article 6(1)d: processing is necessary in order to protect the vital interests of the data subject or of another natural person
	+ Article 6(1)e: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

#### Commercial activities:

* + Article 6(1)f: processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child

#### Advertising and promotion of the University, its goods and services, fundraising:

* + Article 6(1)a: the data subject has given consent to the processing of his or her personal data for one or more specific purpose

#### Alumni relations, issuing of publications, security, prevention and detection of crime; awarding of honorary degrees:

* + Article 6(1)c: processing is necessary for compliance with a legal obligation to which the controller is subject
	+ Article 6(1)d: processing is necessary to protect the vital interests of the data subject or other natural persons
	+ Article 6(1)e: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

### Health and safety:

* + Article 6(1)c: processing is necessary for compliance with a legal obligation to which the controller is subject
	+ Article 6(1)d: processing is necessary to protect the vital interests of the data subject or other natural persons
	+ Article 6(1)e: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
	+ Article 6(1)f: processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child

Prevent Strategy functions**:**

Article 6(1)c: processing is necessary for compliance with a legal obligation to which the controller is subject
Article 6(1)e: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

### Research

Research involving living humans:

* + Article 6 (1) e: processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
	+ Article 9 (j): processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject

# Change History Record

|  |  |  |  |
| --- | --- | --- | --- |
| **Version** | **Description of Change** | **Approval** | **Date**  |
| 1.0 | Initial Draft | - |  |
| 1.1 | Minor comments and corrections | - |  |
| 1.2 | Updated UK GDPR legislation | ISG | 09/2022 |

# Endmatter

|  |  |
| --- | --- |
| Title | Privacy Policy |
| Policy Owner | Planning & Data Protection Officer |
| Approved by | ISG |
| Date of Approval |  |
| Date for Review  | 01/09/2025 |