

## CONSUMER DATA PRIVACY STATEMENT

Last Reviewed: 17th August 2020

#### INTRODUCTION

Heriot-Watt University Student Union ("we", "our" or "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.

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.

#### WHERE WE COLLECT INFORMATION ABOUT YOU FROM

To place an order with us online, 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.

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

The type and quantity of information we collect and how we use it depends on why you are providing it. In making an online purchase we will ask you to provide us with the following personal information:

- Name
- Address
- Email





- Telephone number
- Student ID (if necessary for purchase)

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 or telephone number where provided.

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

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 and contractors.

Our online retail services are provided by external platforms who gather your data and maintain the record of your transaction on our behalf. We restrict access to these platforms using passwords to prevent unauthorised users gaining access. The external provider may also have access to the details you provide to be able to you assist you with enquiries. You should ensure you read the privacy statement of any external platform provider before entering your details. Two such suppliers we currently use are:

Supplier: Membership Solutions Ltd Purpose: Website platform provider

Supplier: PayPal

**Purpose:** Online payment merchant

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to 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

#### KEEPING YOUR INFORMATION UP TO DATE

We request that suppliers, contractors and clients make best attempts to ensure data held by the Students' Union is up to date and accurate. In the event of any changes to data or the discovery of any inaccuracies please contact hello@hwunion.com.

### 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.

The Students' Union operates a Data Protection and Information Security Policy which is supported by a practical handbook for our employees and volunteers. All employees and volunteers handling data are required to undertake general data protection training and third parties handling data are required to provide a contract which meets the requirements of the Information Commissioner's Office.

# 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, and if it's not necessary for the purpose you provided it to us for (e.g. Union policy) we will do





so. Contact us on 0131 451 5333 or privacy@hwunion.com if you have any concerns.

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.

If you want to access your information, you must complete the Subject Access Request Form with a description of the information you want to see and the required proof of your identity by post to Heriot-Watt University Student Union, Riccarton, Edinburgh, EH14 4AS. We do not accept these requests by email so we can ensure that we only provide personal data to the right person.

If you have any questions please send these to privacy@hwunion.com, and for further information see the <u>Information Commissioner's guidance here</u>.

#### 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 privacy@hwunion.com

