

STUDENT 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.

Developing a better understanding of our members through your personal data allows us make better decisions, communicate more efficiently and, ultimately, helps us to reach our goal of having a positive impact with every Heriot-Watt student.

WHERE WE COLLECT INFORMATION ABOUT YOU FROM

We collect information in the following ways:

WHEN YOU BECOME A MEMBER

Each year that you enrol on a Heriot-Watt University accredited course you automatically become a member of Heriot-Watt University Student Union. Heriot-Watt University shares a register of students with us 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.

WHEN YOU GIVE IT TO US DIRECTLY

You may give us your information in order to sign up to a student group or society, 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.

WHEN YOU GIVE IT TO US INDIRECTLY

Your information may be shared with us by independent organisations, for example Heriot-Watt University, Oriam or event partners. These independent third parties will only do so when you have indicated that you have given consent to share this data with us, or they have provided a valid legal basis for doing so. An example could be the Sports Union providing a list of members to enable you to vote during their annual elections on the Student Union voting platform. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

WHEN YOU GIVE PERMISSION TO OTHER ORGANISATIONS TO SHARE

We may combine information you provide to us with information available from external sources in order to gain a better understanding of our members to improve our communication methods, products and services.

The information we get from other organisations may depend on your privacy settings or the responses you give, so you should regularly check them. This information comes from the following sources:

Third party organisations

You may have provided permission for a company or other organisation to share your data with third parties such as the Student Union. This could be when you buy a product or service, register for an online competition or sign up with a comparison site.

Social Media

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.

Information available publicly

This may include information found in places such as Companies House and information that has been published in articles/ newspapers.

WHEN WE COLLECT IT AS YOU USE OUR WEBSITES

Like most websites, we use "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. There are more details in our Cookies Statement available at www.hwunion.com/privacy.

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.

WHEN YOU BUY A PRODUCT FROM US

To place an order with us online, registration is required. At the point of registration, we request certain information including your name, address and email address. This information is required to enable us to process your order and notify you of its progress. 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.

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.

OUR MEMBERS

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. The information provided to the Student Union includes:

- Your name
- Your Student ID
- Your Heriot-Watt email address
- Your mobile telephone number
- Your Date of Birth
- Your year of study
- Your study level (e.g. UG, PGT, PGR etc)
- Your School
- Which campus you study at
- Your enrolment status

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 bank details to facilitate payments
- Information relating to your health if you are taking part in a high risk activity
- Any disabilities so that we can provide assistance where needed

We will mainly use your data to:

- Provide you with the services, products or information you asked for
- Administer your membership
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted
- Understand how we can improve our services, products or information

BUILDING PROFILES OF MEMBERS AND TARGETING COMMUNICATIONS

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 (such as society memberships and mailing list opt-ins) 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.

HOW WE KEEP YOUR DATA SAFE AND WHO HAS ACCESS

Personal data collected and processed by us may be shared with Student Union employees and volunteers 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). 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, unless we believe you may potential harm yourself or others and sharing your data will help to prevent this.

MARKETING & COMMUNICATIONS PREFERENCES

MEMBERSHIP COMMUNICATIONS

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. Occasionally, we may include information from partner organisations or organisations who support us in these communications.

DIRECT MARKETING

As a charity we need to fundraise to provide the services we offer to Heriot-Watt University students. We do this through our retail, food and beverage business, advertising business and events business. We send marketing material 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.

CONTROLLING WHAT YOU WANT TO HEAR ABOUT

We make it easy for you to tell us how you want us to communicate, in a way that suits you. 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. Just let us know when you provide your data or contact us on 0131 451 5333 or privacy@hwunion.com.

KEEPING YOUR INFORMATION UP TO DATE

We mostly use the record of members provided by Heriot-Watt University 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.

The Student 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.

The Student Union does not store any sensitive card data on our systems following online transactions. The Union utilises payment processor Paypal to handle these matters.

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. processing your membership or registering you for an event) 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 [Information Commissioner's guidance here](#).

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.