

## Members Privacy Notice

Last Revised: 20<sup>th</sup> November 2018

### 1. Introduction

Glasgow Caledonian University (GCU) Students' Association ("we", "our" or "us") is a charitable organisation whose registered address is 70 Cowcaddens Road, Glasgow, G4 0BA. We are a registered Scottish charity, number SC022887 and we are registered with the Information Commissioner's Office, with Registration Number Z5904134.

We promise 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 reach our Vision that GCU students will have an outstanding experience that will live with them forever. Our members are defined in [Schedule 1 of our Constitution](#).

All of your personal information will be treated in accordance with the General Data Protection Regulation (GDPR), Data Protection Act 2018 and the data protection principles, as set out in our Data Protection Policy.

### 2. Where we collect information about you from

GCU Students' Association is a 'data controller' and gathers and uses certain information about you. Where we are also a 'data processor', we will process information received from third parties about you.

We collect information in the following ways:

#### **From GLASGOW CALEDONIAN UNIVERSITY**

Each year that as a student you register on a GCU accredited course you automatically become a member of the GCU Students' Association, unless you opt out during registration. GCU annually shares a register of members with us which includes information about you and your course. When GCU 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**

**GCU students** may give us information in order to sign up to a student group, an election, for one of our events, undertake research activities, use our advice service, become a volunteer, purchase our products or communicate with us. When you give us this information we take responsibility for looking after it and, if required, we will cross reference this data against our register of members.

All **GCU employees** are Associate Members of GCU Students' Association and must register an account on our website using their GCU email address in order to take part in social, sporting and cultural activities. GCU employees may give us information in order to sign up to a student group, for one of our events, purchase our products or communicate with us. When you give us this information we take responsibility for looking after it.

Any student who has completed one Trimester at GCU can apply for **Life Membership**. Some individuals are awarded **Honorary Life Membership**. You must register an account on our website in order to take part in social, sporting and cultural activities. Honorary or Life Members may give us information in order to apply for the membership, sign up to a student group, for one of our events, to become a volunteer, purchase our products or communicate with us. When you give us this information we take responsibility for looking after it.

#### **When you give permission to OTHER ORGANISATIONS to share**

Your information may be shared with us by independent organisations. These independent third parties will only do so when you have indicated that you have given consent to share this data with us. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

#### **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.

#### **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](#).

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.

#### **Information available PUBLICALLY**

This may include information that has been published in articles/newspapers.

### **3. What personal data we collect and how we use it**

The legal basis for processing information for members is relying on our legal obligations under the Education Act 1994, you providing consent (such as for direct marketing purposes) and through

legitimate interests in processing a students' membership and sending communications relating to their membership, as part of the wider GCU student experience. We may collect and use your personal information for statistical and archive purposes in the public interest.

The type and quantity of information we collect and how we use it depends on why you are providing it.

### **GCU Students**

When students apply and accept an offer at GCU, they enter into a contract with the University and as part of this they agree that the University can process their personal information for administrative and educational purposes and that limited personal data will be shared with the Students' Association to process a students' membership and receive communications relating to their membership (ie as part of the GCU student experience). It also enables the University to support GCU Students' Association to be run in a fair and democratic manner. When you use our services and participate in one of our activities we use this information to provide the best possible standards of administration and communication.

This information includes, but is not limited to:

- Student ID
- Name
- Date of Birth
- Gender
- Email Address
- Nationality
- Course (Name and Code)
- Study Type (UG, PGT or PGR)
- Level of Study
- Course End Date
- Academic School
- Mode of Study (FT or PT)

GCU Students' Association also shares limited personal data with the University, such as students' involvement in volunteering and student representation, relevant information relating to disciplinary matters or complaints, to facilitate room or event bookings or where we have significant concerns about a GCU students' health or wellbeing. This information is managed through a Data Sharing Agreement between the University and GCU Students' Association.

### **GCU Employees**

In order for GCU employees to activate their Associate Membership you will create an account on our website. You need to provide your name, GCU email address and Date of Birth.

### **Life Members and Honorary Life Members**

Life Members are required to apply to become have a Life Membership. Honorary Life Members are awarded this membership. In order to activate your membership you will create an account on our website and provide your name, email address, Date of Birth, address, course studied at GCU and course end date. You can also choose to provide your Student ID and course start date.

### **All Members**

In addition when you log into our website for the first time, attend an event or activity, join a student group, become a volunteer, candidate in an election or use one of our services we may ask for additional information such as, but not limited to:

- Your mobile number
- Your photo
- Your bank details to facilitate payments
- Information relating to your health or next of kin if you are taking part in a high risk activity
- Any disabilities or access needs so that we can provide assistance where needed
- Demographics
- Interests
- Research responses
- Personal and academic issues you identify to us

We will mainly use your data to:

- Provide you with the services, products or information you asked for
- Provide you with the services, products or information relating to any affiliated clubs or societies
- Administer your membership and our services
- Support you as a volunteer, including registering you for external training, conferences or events
- Keep a record of your relationship and involvement with us
- Facilitate elections
- Administer nominations for award events (ie Sports Ball, Teaching Awards, STAR Awards)
- Ensure we know how you prefer to be contacted
- Understand how we can improve our services, products or information
- Register your membership with National Governing Bodies where relevant, and/or British Universities and College Sport (BUCS) and Scottish Student Sport (SSS).

### **4. How we keep your data safe and who has access**

Personal data collected and processed by us may be shared and restricted to relevant employees and volunteers of GCU Students' Association 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.

Information may be held at our offices, on GCU IT servers and with third party agencies, service providers, representatives and agents. GCU Students' Association use [One Voice Digital](#) as our website and membership system provider. We also collect information using [Jotform](#) and [Survey Monkey](#), who both have their own privacy notices.

Some of our suppliers or service providers run their operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as organisations 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 undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained employees, 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.

Our Advice Centre has a [Confidentiality Policy](#) that outlines how the information you provide to us is used. We will not normally share your personal information with a third party without your consent. We would however breach your confidentiality where there is a legal obligation to disclose information e.g. a court order or where we believe that you, or a third party, is in serious personal danger.

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.

As a member led charitable organisation it is important that our elected representatives are publicly accountable and contactable by members. We publish the names of all elected representatives alongside their assigned @GCUstudents.co.uk email addresses, we may also publish University email addresses where appropriate to the individual and their role such as Academic Reps and Committee Members. Where University email addresses (@caledonian.ac.uk) are published or made available to

members the individual will be entitled to opt-out of this through by contacting [dataprotection@GCUstudents.co.uk](mailto:dataprotection@GCUstudents.co.uk).

We will share information with third parties only in support of the activities of GCU Students' Association, for example entries to national sporting competitions, room bookings, attending external training, conferences or events or insurance purposes. We take the security of your data seriously and will never sell on your data or use it for any other purpose other than for which it was collected. Where we share your personal information with third parties we ensure that we have appropriate measures in place to safeguard your personal information and to ensure that is solely used for legitimate purposes in line with this Privacy Notice.

We keep your information for no longer than necessary for the purposes for which the personal information is processed. Further details can be found in our Retention Schedule.

## **5. 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.

In addition GCU students can opt into receiving tailored communications, such as on specific services, activities and campaigns.

### **Direct Marketing**

We work with third parties to provide you with information that will benefit you such as exclusive discounts, promotions or jobs. When you register on our website you can opt into receiving these marketing emails. When we advertise external companies this generates income that supports providing the services we offer. We do not sell or share personal details to third parties for the purposes of marketing.

### **Controlling what you want to hear about**

You may opt out of email communications at any stage by clicking the link at the bottom of each email we send you or by logging into your account on our website and changing your communication preferences.

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 0141 331 3886 or [dataprotection@GCUstudents.co.uk](mailto:dataprotection@GCUstudents.co.uk).

Please note that we have a legal requirement under the Education Act 1994 that our elections are 'fairly and properly conducted' and for our Full Time Officer Elections that 'all members are entitled to vote'.

Therefore GCU students are not able to opt out of these limited number of election emails. Once you have voted in an election you should stop receiving emails about that election.

## 6. Keeping your information up to date

We mostly use the record of members provided by GCU to maintain accurate data about you as described above. We really appreciate it if you let us know if your contact details change.

## 7. 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.

We use [One Voice Digital](#) as our website and membership system provider. One Voice Digital keeps these systems safe and secure in line with industry best practice. There is a Data Processing Agreement between GCU Students' Association, GCU and One Voice Digital.

We do not store any sensitive card data on our systems following online transactions. We use payment processor contracted through our website provider [One Voice Digital](#) to handle these matters. Payments taken in store are handled through [Worldpay](#).

## 8. Your rights

The [General Data Protection Regulations \(GDPR\)](#) sets out rights for individuals.

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 0141 331 3886 or [dataprotection@GCUstudents.co.uk](mailto:dataprotection@GCUstudents.co.uk).

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 we ask you to make a [Subject Access Request](#).

The [Code of Practice relating to the operation of the Students' Association](#) outlines that GCU students have the right to not be a member of GCU Students' Association. If you do not want to be a member of GCU Students' Association, you can opt out by contacting the Chief Executive of GCU Students' Association: [chief.executive@GCUstudents.co.uk](mailto:chief.executive@GCUstudents.co.uk).

Under certain conditions you also have the right to ask us to:

- Restrict the use of your data e.g. if you have raised issues about the accuracy or use of your personal data, until we have investigated and responded to your concerns.
- Erase your information or tell us to stop using it to make decisions about you.

- Comply with your wishes where you have previously agreed to us processing your data for a particular purpose and have withdrawn your consent to further processing.
- Provide you with a portable electronic copy of data you've given us.

## 9. Changes to this Privacy Notice

We may change this Privacy Notice 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 or concerns please send these to [dataprotection@GCUstudents.co.uk](mailto:dataprotection@GCUstudents.co.uk). You can see further information and guidance from the [Information Commissioner's Office](#).