

## RVCSU Privacy Statement and Data Protection Policy

The collection and use (processing) of your data is governed by the UK General Data Protection Regulation (GDPR) Data Protection Act 2018, and other relevant UK legislation.

We take our responsibility to protect your privacy seriously. This statement sets out the data we collect about you, how we collect it, the reasons for collecting it, how we use it, how we store it, how long we keep it for, and our policy regarding sharing information with others. It also tells you about your rights concerning this data.

RVC Students' Union (RVCSU) ("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 with your data. This Data Privacy Statement sets out what you need to know and what you can expect from RVC Students' Union, in line with your rights under the UK General Data Protection Regulations and Data Protection Act (2018) ("GDPR").

In this document, a controller and processor are defined as this as per the [ICO Website](#)

'*controller*' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

'*processor*' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

### Where do we collect information about you from?

We collect information in the following ways:

**When you give it to us directly:** You may give us your information in order to take part in our membership activities, use one of our services, take a survey, purchase products or communicate with us. When you give us this information, we take responsibility for looking after it. There are some areas of RVCSU where we may have additional privacy policies and treat your data in a different way, including if we employ you, and if you use our advice and support services. Giving your information to student groups and societies means you are giving this information to RVCSU directly, as these groups are RVCSU groups and our covered under our policies and procedures.

**When we collect it as you use our website:** Like most websites, we use cookies to help us make our site – and the way you use it – better. Cookies mean that our website will remember you, and do things like automatically filling your name and address in text fields. You can control and/or delete cookies as you wish – for details, see [aboutcookies.org](#). You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and

functionalities may not work. 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.

**Through our Data Sharing Agreement with The Royal Veterinary College (RVC):** Each year, when you enrol as a student at RVC you automatically become a member of RVC Students' Union, unless you chose to opt-out of membership. RVC shares a register of members with us which gives us information about you and the course you're studying. When you share your data with RVC you are agreeing to share part of that data with us. What data is shared, and the way that we use it is set out in this agreement. When RVC gives us this data we become responsible for it, and we use it as the core information for your membership.

**When you buy a product or ticket from us:** To place an order with us online, registration is required. At the point of registration, we request certain information including your name, delivery 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. We do not store any sensitive card data on our systems following online transactions. We use payment processor [PayPal](#) and [MSL](#) to handle these matters. We have data sharing agreements in place with these organisations to ensure your data is handled in accordance with the law.

### **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:

When you take part in our membership activities and use our services, we will use this information to provide the best possible standards of administration and communication.

We may ask for information such as:

- Your name and contact details so that we, and the group you are joining can keep in touch with you.
- Your bank details to facilitate payments.
- Your date of birth so that we are compliant with age related law, and can uphold appropriate safeguarding.
- Information relating to your health if you are taking part in relevant high-risk activities.
- Information about any disability so that we can provide reasonable adjustments and support.

We mainly use your data to:

- Administer your membership.
- Provide you with the services, products, or information you asked for.
- Keep a record of your relationship with us.
- Ensure we know how you prefer to be contacted.
- Enable your activities through any national governing bodies like British Universities & College Sports
- Personalise communications, using information about who you are, what you study, what groups you're involved in to send relevant communications to relevant people.

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

Personal data collected and processed by us may be shared with RVCSU employees and volunteers and under strictly controlled conditions the following groups where necessary:

- Contractors
- Agents
- Advisors
- 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 and service providers.

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 be required to provide personal data to a Court, law enforcement or emergency services if required to do so by law. This would only be where legally required to do so.

In all other circumstances we will only ever share your data if we have your explicit and informed consent.

## Marketing & Communications Preferences

**Membership Communications:** We believe we have a legitimate interest in communicating with our members about what your elected officers are doing, the services we offer to our members, what we're doing to represent you, democratic decisions affecting our members and opportunities that might be of interest to you.

**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. If you don't want to hear from us, that's fine. Just let us know when you provide your data, by setting your preferences on our website or contact us on [rvcsu@rvc.ac.uk](mailto:rvcsu@rvc.ac.uk)

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. to provide our service to you) we will do so. Contact us on [rvcsu@rvc.ac.uk](mailto:rvcsu@rvc.ac.uk) if you have any questions.

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

**Subject Access Requests:** If you want to access your information, please contact [rvcsu@rvc.ac.uk](mailto:rvcsu@rvc.ac.uk) with a description of the information you want to see and a proof of your identity. If you have any questions please send these to [rvcsu@rvc.ac.uk](mailto:rvcsu@rvc.ac.uk) and for further information see the [Information Commissioner's guidance](#).

## Your rights to your data

You are protected by UK law and the General Data Protection Regulations. Your rights relating to data are:

- The right to be informed
- The right to access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability

- The right to object
- Right in relation to automatic data processing and profiling

You can find out more about your rights on the [ICO website](#)

### **Exercising your rights**

To ask us to stop contacting you: you can sign up to and unsubscribe from specific email communications using our website and links in the emails. You can also make a request via [rvcsu@rvc.ac.uk](mailto:rvcsu@rvc.ac.uk)

To ask us for a copy of your data: email [rvcsu@rvc.ac.uk](mailto:rvcsu@rvc.ac.uk) with the description of the information you want to see. To protect your data privacy and prevent data theft you will be asked to provide proof of identity. We will provide you with your data within 30 days of receiving your proof of ID.

To ask us to delete your data: contact us via [rvcsu@rvc.ac.uk](mailto:rvcsu@rvc.ac.uk) with a description of the data you want to have erased. To protect your data privacy and prevent data theft you will be asked to provide proof of identity. We will provide you with your data within 30 days of receiving your proof of ID. We may not be able to delete your data if it is required for the purpose you supplied it, for example if you provided us your name to buy a ticket for an event you still want to attend.

To ask us to correct your data contact us via [rvcsu@rvc.ac.uk](mailto:rvcsu@rvc.ac.uk) with a description of the information that is incorrect, out of date or incomplete.

### **Student groups, societies, clubs**

RVCSU are not the data controller for any of the websites, social media pages or communications belonging to any societies, campaigns, sports clubs, student media groups independently.. To exercise your data rights you will need to contact the student group directly. If you have any questions or need any assistance with this contact us via [rvcsu@rvc.ac.uk](mailto:rvcsu@rvc.ac.uk). To make a complaint about how a student group has handled your data contact us with the relevant information via [rvcsu@rvc.ac.uk](mailto:rvcsu@rvc.ac.uk)

### **Complaints about our handling of your data**

Our aim is to work with you on any requests relating to your personal information, however if you are not satisfied with the response you can make a complaint using the [SU complaints procedure](#)

If you do not feel RVCSU have adequately dealt with your complaint you have the right to complain to the Information Commissioner’s Office (ICO). You have a right, at any time, to complaint to the ICO. As an independent UK authority, it upholds information rights in the public interest, promotes openness by public bodies and data privacy for individuals. You can visit their website at <https://ico.org.uk/>

**Changes to this Privacy Statement:** We may change this Privacy Statement from time to time. If we make any significant changes to how we treat your personal information we will make this clear on our website or by contacting you directly.

### RVCSU Data Processing Information Table

Reason for processing your data	“Special Category Data” that we process	Categories of Personal Data that we process	Length of time your data is retained	Article 6 Lawful basis for processing your data	Article 9 Lawful basis for processing your “Special Category” Data	Rights that may be available to you
To provide membership services to RVCSU members	Ethnicity, Disability	Title, Name, Middle Name, Last Name, Preferred Name, Pronouns, Date of Birth, Student ID Number, Year of Study, Course Name, Email Address, Phone Number, Contact Address, Nationality, Gender	5 Years After <ul style="list-style-type: none"> <li>- Graduation</li> <li>- Withdrawing from RVC</li> <li>- Leaving membership of RVCSU</li> </ul>	Legitimate Interests	Substantial public interest, where processing is necessary to uphold and monitor the equality of opportunity or treatment in an organisation	Right to: <ul style="list-style-type: none"> <li>- Erasure</li> <li>- Object</li> <li>- Access</li> <li>- Rectify</li> <li>- Restrict</li> </ul>
To facilitate membership activities and groups that you express interest in or join such as sports, societies and campaigns.	Not applicable	Name, Gender, Nationality, Student Status, Contact address, Student ID number, email address	5 Years After <ul style="list-style-type: none"> <li>- Graduation</li> <li>- Withdrawing from RVC</li> <li>- Leaving membership of RVCSU</li> </ul>	Legitimate Interests	Not Applicable	Right to: <ul style="list-style-type: none"> <li>- Erasure</li> <li>- Object</li> <li>- Access</li> <li>- Rectify</li> <li>- Restrict</li> </ul>
To communicate membership services and opportunities by email that aid the	Not Applicable	Name, University Email Address, Course	1 Years After <ul style="list-style-type: none"> <li>- Graduation</li> <li>- Withdrawing from RVC</li> </ul>	Legitimate Interests	Not Applicable	Right to: <ul style="list-style-type: none"> <li>- Erasure</li> <li>- Object</li> <li>- Access</li> <li>- Rectify</li> </ul>

student experience of those studying at RVC			- Leaving membership of RVCSU			- Restrict
To communicate information about specific products and services by email (eg about our shop, bar or events)	Not Applicable	Name, University Email Address, Course	1 Years After - Graduation - Withdrawing from RVC - Leaving membership of RVCSU	Consent	Not Applicable	Right to: - Erasure - Access - Rectify - Restrict - Withdraw - Portability
To generate insights to improve our event and services and ensure we provide an inclusive services, products and activities	Ethnicity Disability Sexuality	Name, Gender, Nationality, Student Status, Contact Address, Student ID number, university email address	2 years after completing survey	Consent	(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;	Right to: - Erasure - Access - Rectify - Restrict - Withdraw - Portability
To support RVCSU members to resolve issues, complaints and disputes with the University or external organisations.	Ethnicity Disability Sexuality	Name, Gender, Nationality, Student Status, Contact Address, Student ID number, university email address	6 years from completion and closure of casework	Legitimate Interests	(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject; (g) substantial public interest for the purpose of monitoring equality of opportunity or treatment	Right to: - Erasure - Object - Access - Rectify - Restrict

To provide event ticketing for Union events/activities and sports and societies events/activities to ensure smooth and effective administration of events/activities.	Not Applicable	Name, Email Address, Student ID Number	6 years from transaction	Contract and Legitimate Interests	Not Applicable	Right to: <ul style="list-style-type: none"> <li>- Erasure</li> <li>- Access</li> <li>- Rectify</li> <li>- Restrict</li> <li>- Withdraw</li> <li>- Portability (Contract Only)</li> <li>- Object (Interest Only)</li> </ul>
Use of sexuality, disability and ethnicity data to facilitate democratic processes as outlined in the Unions Constitution and Schedules	Ethnicity Disability Sexuality	Name, Gender, Nationality, Student Status, Contact Address, Student ID number, University email address	5 Years After <ul style="list-style-type: none"> <li>- Graduation</li> <li>- Withdrawing from RVC</li> <li>- Leaving membership of RVCSU</li> </ul>	Consent	(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject; (g) substantial public interest for the purpose of monitoring equality of opportunity or treatment	Right to: <ul style="list-style-type: none"> <li>- Erasure</li> <li>- Access</li> <li>- Rectify</li> <li>- Restrict</li> <li>- Withdraw</li> <li>- Portability</li> </ul>
Photographs used for marketing and publicity	Not applicable	Faces and Names	8 years after photos were taken	Consent	Not Applicable	Right to: <ul style="list-style-type: none"> <li>- Erasure</li> <li>- Portability</li> <li>- Withdraw</li> <li>- Access</li> <li>- Rectification</li> <li>- Restriction</li> </ul>
Buying through our website (tickets, products, membership)	Not applicable	Name, Student Status, Contact Address, Student ID Number, University Email Address	6 years after transaction	Contract	Not applicable	Right to: <ul style="list-style-type: none"> <li>- Erasure</li> <li>- Portability</li> <li>- Access</li> <li>- Restriction</li> </ul>



						- Rectification
Acting as a data processor for student groups, societies, campaigns etc	Ethnicity, disability, sexuality	Name, gender, nationality, student status, contact address, student ID number, university email address	5 Years After <ul style="list-style-type: none"> <li>- Graduation</li> <li>- Withdrawing from RVC</li> <li>- Leaving membership of RVCSU</li> </ul>	Contract	We act as a "data processor" for RVCSU Student groups	Right to: <ul style="list-style-type: none"> <li>- Erasure</li> <li>- Portability</li> </ul>

