# **CRM Privacy Statement**

## We believe in complete transparency.

We use Microsoft Dynamics CRM and dotdigital to provide a source of data on enquirers, applicants, current students and graduates. In Marketing, we share this information only with the e-communications, student and academic services, events and faculty-based teams. The intention behind this shared resource is to improve mutual understanding, by enhancing the quality of our communication at all levels and developing a better appreciation of our relationship with you. The systems we use have strict Business Policies and permissions integrated into them.

For Placements we share information with the placement organisations for the purpose of the provision of the student's programme of study. In terms of users, employees of placement organisations we have data captured this in CRM. We information we require for placements include a name, work email and where they work. From a GDPR prospective, how and why we retain this data is detailed in the Placements Organisation Partnership Agreement. For the purposes of the Data Protection Act, the University and the applicable Participant(s) are joint "data controllers" of enquirers, applicants and current student data.

## Personal data processed in CRM and dotdigital.

Any personal data held about you will usually have been collected from you during your relationship with the University/University partners including UCAS. The personal data that may be stored and processed by CRM and dotdigital are divided into two categories. The "shared tier" and the "restricted tier".

The "shared tier" which is accessible by select CRM users at the University includes your name and title, date of birth, contact details and course details.

The "restricted tier" category is only available to those who have explicit access to such data as finance (including records of donations that you have made to the University of Northampton or direct debits), this data is held with the Finance Department and/or Advancement and Fund-raising team. All other data such as information relating to your family and personal interactions, or any disability, qualifications, information from tutors, or data held with Student Services is only available to those who have explicit access to that data.

#### How your data may be used.

The University will process personal data in accordance with the performance of contractual arrangements, you as a student have with us (including your obligations to the professional body Art 6 1(b))

Unless you have requested otherwise, the University and its Participants may use the data held in CRM and dotdigital for a range of communications and marketing activities with you (by email, mail, telephone, social media or text message), including distribution of publications, the promotion of benefits and services, notification of events and for programmes involving academic and administrative departments. Tools may be used to monitor the effectiveness of our communications with you, including email tracking, which records when an email from us is opened and/or how many links are clicked within the message. The data from this tracking is generally used in an anonymised form.

You have the right under the GDPR and Data Protection Legislation, particularly (In accordance with the General data Protection Regulation (GDPR) (EU) 2016/679, (as amended by the UK GDPR and in conjunction with the UK Data Protection Act 2018), The University will process personal data in accordance with the performance of contractual arrangements you as a student have with us (including your obligations to the professional body). (Art 6 1(b)). You have the right to make representation to the University and at any time during your enrolment on your programme

Please contact <u>CRMsupport@northampton.ac.uk</u>, <u>study@northampton.ac.uk</u> or the applicable contacts at the University as appropriate if you wish to opt out of any of the below:

- your details being held
- receiving any or all the range of communications and marketing activities
- to amend the contact information, we use to reach you.

If you request that your data is removed from CRM and/or dotdigital, we will remove all personal data, with the following exceptions:

- Any Placement data was we have the legitimate right to keep this data
- a note of the request to remove your data will be retained, to prevent you from being inadvertently contacted in the future;
- an anonymous reference may be attributed to you in documentation compiled from the record of your event attendances and/or the record of donations that you have given, for the purposes of internal or external recording or accounting for any

event attended, and for any donation required to be retained for audit, reporting or accounting purposes.

Then 5 years after graduation the data is transferred to our Fundraising and Advancement teams who will contact you when this happens and allow you the opportunity to ask questions and opt in or out of communications. For more information please see our Alumni Privacy Statement.

#### Security measures and data retention.

We take the security of your personal data very seriously. In addition to the security measures imposed on users of the systems themselves, the systems have measures in place to ensure compliance with all Information Commissioner's Office regulations.

In accordance with the principles of the GDPR, we aim to keep the data held in CRM and dotdigital up to date and only if the data is still relevant for the above purposes or otherwise for reporting or auditing requirements of the university and its participants. Please let us know if your details need updating at any time by contacting <a href="mailto:CRMsupport@northampton.ac.uk">CRMsupport@northampton.ac.uk</a>.

# Your rights to access your personal data.

As a data subject, under the GDPR and Data Protection Legislation, particularly (In accordance with the General data Protection Regulation (GDPR) (EU) 2016/679, (as amended by the UK GDPR and in conjunction with the UK Data Protection Act 2018), The University will process personal data in accordance with the performance of contractual arrangements you as a student have with us (including your obligations to the professional body). (Art 6 1(b)), you have rights of access to the personal data held about you by any data controller. If you wish to access the personal data held about you in CRM and dotdigital, please contact the head of the University of Northampton Records Team <a href="mailto:phil.oakman@northampton.ac.uk">phil.oakman@northampton.ac.uk</a>.

## Contacting us.

If you have any queries about the use of your personal data, wish to notify us of a change in your contact details or wish to request a change to the processing of your personal data, please contact <a href="mailto:CRMsupport@northampton.ac.uk">CRMsupport@northampton.ac.uk</a>.