

# University of Northampton Core Privacy Notice

### Who we are?

We are the University of Northampton and we process your personal data to provide you with University services, to undertake our responsibilities and legal/statutory obligations, and to monitor our own performance. The University of Northampton is a data controller, registered with the Information Commissioner's Office, and for the purposes of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR), we have appointed a Data Protection Officer who has formal responsibility for data protection compliance within the organisation.

Our Data Protection Officer can be contacted at:

DPO@northampton.ac.uk

Or by writing to:

The Data Protection Officer, Vice Chancellor's Office, Waterside Campus, University of Northampton, NN1 5PH

### What data do we hold about you?

The type of data the University of Northampton holds about you will be dependent on which University process uses your data. There are specific Privacy Notices with more details available at: <u>https://www.northampton.ac.uk/about-us/privacy-policy/</u> In general terms we will process your personal data because it is necessary to:

- carry out our obligations to you
- deliver your chosen course as a student
- manage your employment as a member of staff
- maintain the interests of the public
- uphold the law including our statutory and regulatory obligations.

Some main examples of the personal data which we might process are listed below. This list is not exhaustive:

- Your name
- Contact details
- Date of birth
- Nationality
- Ethnic origin
- Academic history including qualifications
- Disabilities
- Medical information as appropriate to maintaining wellbeing
- Financial information
- Your use of the University's facilities such as the library
- Disciplinary action
- Digital photograph

### How do we collect your data?

#### **Direct Collection**

We collect data to operate effectively and provide you the best experience at the University. You may provide some of this data directly to us, such as when you apply for a University place or begin as a member of staff.

#### **Indirect Collection**

We also obtain data from third parties. A good example of this is student data from UCAS (Universities and Colleges Admissions Service). UCAS collect your personal data to manage and support your application to higher education, which they then share with prospective universities. For staff, the University may for example get information from a previous pension provider to transfer your provision to a University scheme.

### Why do we process your data?

We may process your personal data because it is necessary for the performance of a contract with you. In this respect, some of the reasons we use your personal data may be for the following:

- to interact with you before you are enrolled as a student, as part of the admissions process
- to interact with you as a prospective member of staff before appointment
- once you have enrolled or been appointed, to provide you with the services as set out in our Student Agreement or your employment contract
- to deal with any concerns or feedback you may have
- for any other purpose for which you provide us with your personal data
- for the administration of disciplinary processes
- to pay staff and administer pension rights.

We may also process your personal data because it is necessary for the performance of our tasks carried out in the public interest or because it is necessary for our or a third party's legitimate interests. In this respect, we may use your personal data for example the following:

- to provide you with educational services which may not be set out in our Student Agreement but which are nevertheless a part of our academic and educational mission
- to monitor and evaluate the performance and effectiveness of the University, including by training our staff or monitoring their performance
- to maintain and improve the academic, corporate, financial, estate and human resource management of the University
- to promote equality, diversity and inclusion throughout the University
- to seek advice on our rights and obligations, such as where we require legal advice
- to recover money you owe to us.

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

- to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements
- for the prevention and detection of crime
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal data where:

- it is necessary for medical purposes
- it is necessary to protect your or another person's vital interests

• we have your specific or, where necessary, explicit consent to do so.

### Who do we share your data with?

The University may share your data with:

- Other public authorities or public partnerships, such as schools, hospitals, police as the law requires
- Government departments such as HESA (Higher Education Statistics Agency)
- University of Northampton Students' Union
- Organisations with which we hold contracts which help us deliver our services to you.

# How long do we keep your data for?

Your personal data is kept in accordance with the University's Records Retention Schedule.

#### Students

The University continues to hold some data about you even you have completed your studies. This may be used as evidence of your academic achievements, to supply statistics, or to provide information to regulatory bodies and other agencies to whom we are legally required to supply data.

#### Staff

We have statutory obligations to retain permanently certain records for example any contact with hazardous materials or relating to your pension.

#### Disposal

Personal data is disposed of periodically in accordance with the University's retention schedule. This ensures that the data retained is proportionate and necessary to the role of the University and its purpose for processing.

# Your rights

Under the Data Protection Act you have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you
- to require that we cease processing your personal data if the processing is causing you substantial damage or distress
- to require us to correct the personal data we hold about you if it is incorrect
- in some cases to require us to erase your personal data
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal)
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

For more information on these rights please contact the Data Protection and Information Governance team at DPO@northampton.ac.uk.

### How do we keep your data secure?

The General Data Protection Regulations requires us to process your personal data securely. This includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage. The University takes all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Where the University transfers your data to any organisation in a third country or international organisation (e.g. using Cloud storage) appropriate or suitable safeguards will be written into the contract with the other organisation.

# **Profiling and automated decisions**

Large volumes of information, from a range of sources can be processed using algorithms to detect trends and correlations. Occasionally your data may be processed in this way to help identify students when extra support may be needed, for example if you are at risk of failing in an aspect of your course.

No decision made by the University is based solely on such automated processing.

### How to complain

If you have a complaint about the way you believe your data is being processed, in the first instance, a discussion with the Data Protection and Information Governance team may resolve things and they can be contacted by emailing:

DPO@northampton.ac.uk.

If you remain dissatisfied, you have the right to refer your complaint to the Information Commissioner's Office (ICO) for a review

https://ico.org.uk/

# **Document information**

**Owner:** Data Protection and Information Governance team, <u>DPO@northampton.ac.uk</u>

Date of last review: November 2023