

Sheffield Hallam Students' Union Privacy Statement

The privacy of our stakeholders is important to us and the Students' Union takes care to safeguard it. The following information details how the Students' Union uses personal data in line with the requirements of the UK General Data Protection Regulation (UK GDPR). The Privacy Notice below sets out how we use the personal data of website users, enquirers and visitors.

Introduction

This notice covers the personal data that we collect by phone, website, email and voicemail. We have separate Privacy Notices for [Employees, Applicants, Workers and Contractors](#) & [Students](#).

In 2018, the UK adopted the GDPR into domestic law to make the UK GDPR, as well as enacting the Data Protection Act 2018 which sits alongside the UK GDPR to help application to the UK context. Personal data is information relating to an identifiable living individual.

Transparency is a key element of the GDPR and this Privacy Notice is designed to inform you:

- How and why the Students' Union uses your personal data,
- What your rights are under GDPR
- How to contact us so that you can exercise those rights

Contact details

Address:

6 Paternoster Row
Sheffield
South Yorkshire
S1 2QQ

Phone: 0114 225 4111

We have appointed a Data Protection Officer (DPO), who can be contacted should you have any questions regarding the ways in which your data is processed.

DPO email: dpo@bruceandbutler.com

What are the legal conditions/lawful bases for processing?

The legal conditions/lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever the Students' Union and other organisations process personal data:

- **(a) Consent:** you, the data subject, have given clear consent for the Students' Union to process your personal data for a specific purpose.
- **(b) Contract:** the processing is necessary for a contract that the Students' Union has with you, or because you have asked the Students' Union to take specific steps before entering into a contract.

- **(c) Legal obligation:** the processing is necessary for the Students' union to comply with the law (not including contractual obligations).
- **(d) Vital interests:** the processing is necessary to protect someone's life.
- **(e) Public task:** the processing is necessary for the Students' Union to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- **(f) Legitimate interests:** the processing is necessary for the Students' Union's legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the your personal data which overrides those legitimate interests.

Personal data that we collect:

- Identity data: First name, last name
- Contact data: Address, phone number
- Technical data: IP address, geographical data, behavioural tracking

Why do we process personal data?

We process personal data across the Union to:

- **Respond to enquiries from students (Legal Basis-legitimate interests)** such as responding to requests for information about our services. To answer enquiries the Students' Union may use a customer relationship management system (CRM). It is in the Students' Union's **legitimate interests to provide you with further information which we believe is relevant to your enquiry**. You will have the opportunity to manage your preferences which includes the right to object to this processing and unsubscribe from further communications at any time. In these cases, the Students' Union will respond promptly to any such request.
- **Registration for events (Legal Basis-Performance of a Contract)**. We collect data that you provide to the Students' Union to enable us to register you for our events. Where you provide special categories of personal data/sensitive personal data, e.g. access requirements/disability/reasonable adjustments, we use this data **to provide you with further information and to make reasonable adjustments to help**. You will have the opportunity to manage your preferences which includes the right to object to this processing and unsubscribe from further communications at any time. In these cases the Students' Union will respond promptly to any such request.
- **Subscription Services (Legal Basis-Consent)** such as SMS text messages with regular updates. Any information you supply for this is used only to deliver messages based on the subject you choose to the email address or phone number you specify. You may unsubscribe at any time. In these cases, the Students' Union will respond promptly to any such request. Your data will be retained until you unsubscribe from this service.
- **To process orders made through the Students' Union online shop (Legal Basis- Performance of a Contract)** such as merchandise and tickets. The Students' Union shop offers a variety of services which you will need to log in or register for to order goods and services from the Students' Union. You may be asked to supply different types of personal data depending on the goods or services you have requested such as:
 - Purchase of merchandise such as Sheffield Hallam University branded clothing
 - Event tickets

Information related to financial transactions will be retained for up to 7 years for tax and audit purposes.

- **To process applications for employment (Legal Basis-Necessary for the performance of a contract)**. In order to apply for a vacancy within the Students' Union, and for the application to be processed, applicants are required to submit personal details. Where we process special categories of personal data/sensitive personal data in relation to your employment application, we do so on the basis of the employment in Article (9)(b) of the UK GDPR. You will always have the option of responding to the equality monitoring questions with "Prefer not to say".

- **Respond to Freedom of Information requests (Legal basis - legal obligation).** In order to make a valid FOI request, you must provide your name and an address/email address for correspondence. These are used for the purpose of managing your request and complying with our legal obligations. Data that you supply and our response to you will be retained for 6 years to fulfil legal obligations.
- **Respond to other enquiries (e.g. research, consultancy, business services) (Legal basis - consent, necessary for a contract, legitimate interests depending on the nature of your enquiry).** The Students' Union will use the data that you provide to respond to your enquiry. To answer enquiries the Students' Union may use a customer relationship management system (CRM). It is in the Students' Union's legitimate interests to process your personal data and provide you with further information which we believe is relevant to your enquiry. Where we rely on legitimate interests, you will have the opportunity to manage your preferences which includes the right to object to this processing and unsubscribe from further communications at any time. In these cases the Students' Union will respond promptly to any such request. Retention will depend on the nature of your enquiry.
- **Browsing our website and monitoring the usage of our website (Legal basis - legitimate interests).** Please see our [Cookies Policy](#).
- **To maintain the appropriate physical, electronic and organisational security measures of the Students' Union (Legal Basis-Legitimate Interest).** The Students' Union collects data through our CCTV which has signage in place to indicate areas that have CCTV in place. Please see our [CCTV Policy](#).
- **Process feedback on our services (Legal Basis-Legitimate Interests).** If you contact us by email or through a web page to request information, report a problem, make a complaint or provide feedback on our services we will use the information you provide to respond to your message, to address the issue you have raised, and to make improvements to our services. We do not use this information for other purposes.

Who do we share your data with?

You should be aware that in order to provide our services we may need to share your personal or sensitive personal data within the organisation or outside Sheffield Hallam Students' Union. The privacy of your personal data is paramount and will not be disclosed unless there is a justified purpose for doing so.

The Students' Union NEVER sells personal data to third parties.

Your data may be used by or shared with:

- **Students' Union staff** who need the information to process your request, purchase or application.
- **Contractors and suppliers**, where the Students' Union uses external services or has outsourced work which involves the use of your personal data on our behalf. The Students' Union will

ensure that appropriate contracts and/or data sharing agreements are in place and that the contractors and suppliers process personal data in accordance with the UK GDPR and other applicable legislation. Examples of suppliers include Membership Solutions Limited, who host our Online Store, SagePay who process payments on behalf of the Union, SHU IT services and support, confidential waste disposal, mailing services. If we need to transfer your personal information to another organisation for processing in countries that aren't listed as 'adequate' by the European Commission, we'll only do so if we have model contracts or other appropriate safeguards (protection) in place.

- **Government bodies and departments**, in the UK and overseas, responsible for statistical analysis, monitoring and auditing.

We may also ask for your consent to use your personal data for other purposes. You will be given additional information for each purpose and have the right to withdraw your consent at any time.

Security

The Students' Union takes a robust approach to protecting the information it holds. This includes the installation and use of technical measures including firewalls and intrusion detection and prevention tools on our network and segregation of different types of device; the use of tools on Students' Union computers to detect and remove malicious software and regular assessment of the technical security of our systems. Sheffield Hallam University IT staff monitor systems and respond to suspicious activity. The University has Cyber Essentials certification.

Alongside these technical measures, there are comprehensive and effective policies and processes in place to ensure that users and administrators of Students' Union information are aware of their obligations and responsibilities for the data they have access to. By default, people are only granted access to the information they require to perform their duties.

Training is provided to new staff joining the Students' Union and existing staff have training, manuals and expert advice available if needed.

Managing your preferences

In line with the UK GDPR you have the right to manage how the Students' Union gets in contact with you and how they can do this e.g. email, SMS or post. To manage these preferences click [here](#).

Data subject rights

One of the aims of the UK GDPR is to empower individuals and give them control over their personal data. The GDPR gives you the following rights:

- The right to be **informed**
- The right of **access**
- The right to **rectification**
- The right to **erase**
- The right to **restrict** processing

- The right to **data portability**
- The right to **object**
- Rights in relation to **automated decision making and profiling**

For more information about these rights please see the relevant Privacy Notice, which details how you can action them.

You should contact the Data Protection Officer if:

- You wish to request details of any data held on yourself
- You would like to report a data security breach (e.g. if you think your personal data has been lost or disclosed inappropriately)
- You would like to **complain** about how the Students' Union has used your personal data
- You have any questions about this privacy notice or how your data is processed

Data Protection Officer
Sheffield Hallam Students' Union
The HUBS
Paternoster Row
Sheffield
S1 2QQ

dpo@bruceandbutler.com

Further information and support

The Information Commissioner is the UK's independent regulator for the UK's data protection legislation. The Information Commissioner's Office (ICO) has a website with information and guidance for members of the public: <https://ico.org.uk/for-the-public/>

The ICO operates a telephone helpline, live chat facility and email enquiry service. You can also report concerns online. For more information, please see the Contact Us page of their website: <https://ico.org.uk/global/contact-us/>

Changes to this Notice

If we decide to change this Privacy Notice, we would post such changes on this page so that you are always aware of what information we collect, how we use it and under what circumstances we disclose it.

Sheffield Hallam Students' Union is not responsible for the content of external websites.