

The Robert Gordon University Student Association

GDPR Privacy Statement

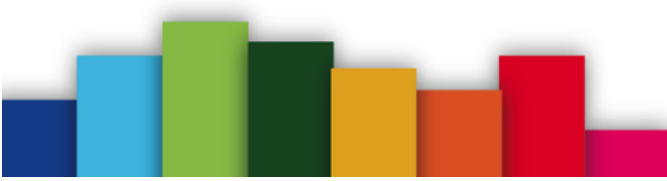
Last updated	24 th May 2018
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Definitions

Charity	The Robert Gordon University Student Association, a registered charity
GDPR	The General Data Protection Regulation
Responsible Person	Michele Collie, General Manager (m.collie@rgu.ac.uk)
Data Retention Guide	A register of all systems or contexts in which personal data is processed by the Charity

Key contacts

Data Protection Officer (Robert Gordon University)	Ian Croft, Information Governance & Complaints Officer (i.f.croft@rgu.ac.uk)
Controller	Michele Collie, General Manager (m.collie@rgu.ac.uk)
Representative	Gregor Mailer, Design & Marketing Manager (ext.mailer@rgu.ac.uk) Stephen Fiddes, Student Advice & Administration Coordinator (s.j.fiddes@rgu.ac.uk)



1. Introduction to the Privacy Statement

The General Data Protection Regulation (GDPR) is a European Union wide law that was introduced on 25th May 2018 and which supersedes the Data Protection Act 1998 in the UK, giving more rights to you as an individual and more obligations to organisations holding your personal data. One of your rights is to be informed, which means we are required to give you more information about the way in which we use, share and store your personal data.

We (Robert Gordon University Student Association, thereafter 'RGU:Union') are an independent student-led organisation which exists to represent, engage, support and develop all members. RGU:Union provides opportunities for extra-curricular activities to ensure all students get the most from their time at RGU.

This statement covers the following obligations as defined by the GDPR:

- How RGU:Union collects your data
- How RGU:Union records your data
- How RGU:Union uses your data
- How RGU:Union retrieves your data
- How RGU:Union stores your data, including period of retention
- How RGU:Union discloses your data, where relevant
- Our legal basis for processing your data
- Your rights and how you can access, amend and delete your personal data.

To explain the data RGU:Union collects in an easily understandable format, we have presented it according to how we gather this data/how you interact with us.

2. Data protection principles

The charity is committed to processing personal data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for

longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General provisions

- a. This policy applies to all personal data processed by the charity.
- b. The Responsible Person shall take responsibility for the charity’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually (see “Changes to this privacy statement” section below)
- d. The charity shall register with the Information Commissioner’s Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. The lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever we process your personal data:
 - Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
 - Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
 - Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
 - Vital interests: the processing is necessary to protect someone’s life.
 - Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
 - Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)
- b. To ensure processing of data is lawful, fair and transparent, the charity shall maintain a Data Retention Guide.
- c. The Data Retention Guide shall be reviewed at least annually.
- d. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner (see “Your Rights” section below).

4. What information we collect about you

As a part of our service, RGU:Union will collect and store information about you (your personal data). The tables below explain in what instances we will collect data, what data we will collect, why we collect it, how long it is stored for and whether it is shared with any other parties.

When you use our digital services

	Retention Period	Sharing (Is the data shared with or accessed by other parties?)	Legal basis
MSL User (individuals who register on our website,	Defined by user	MSL	Consent

which is a content-management system provided by Membership Solutions Ltd)			
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When you provide personal data

	Retention Period	Sharing (Is the data shared with or accessed by other parties?)	Legal basis
Society Membership	6 years	No	Consent
Sports Club Membership	6 years	Robert Gordon University	Consent
Student Group Membership	6 years	No	Consent
Volunteer Registration	6 years	Robert Gordon University (eg HEAR) Affiliated organisations	Consent
Student Election Candidate	Unlimited	No	Consent Legal obligation
Advice Service User	4 years	No	Consent
Nightline Service User	4 years	No	Consent
Participants in Democratic Processes	Unlimited	Shared with student body	Consent Legal obligation
Class Representatives	4 years	University Student body	Consent
Enter a competition	1 year	No	Consent
Complaints	5 years	No	Consent
Give us feedback (unprompted)	2 years	No	Consent
Give us feedback (when we ask you)	2 years	No	Consent
When you use other platforms to interact with us	When you use a social media platform, details about how your personal information is held, is described within the relevant social media policy, such as Facebook or Twitter.	N/A	N/A
Incident Reporting/Health and Safety	3 years from the date the report was made	University	Consent

Human Resource data	6 years after employment ceases	University	Consent
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When you contact us directly

	Retention Period	Sharing (Is the data shared with or accessed by other parties?)	Legal basis
When you email us	When you contact us via email, we will retain your email and our response to it for as long as the business issue remains	No	Consent
When you write to us	When you contact us via post, we will retain your letter/postal address/personal information and our response to it for as long as the business issue remains	No	Consent

Information that is shared with us

	Category of data (i.e. whether the data is sensitive)	Retention Period	Sharing (Is the data shared with or accessed by other parties?)	Legal basis	Legitimate interest
Student data from Robert Gordon University	No	For duration student enrolment	No	Legitimate interest Legal obligation	Information is distributed to new students regarding RGU:Union, as they will become members upon enrolling at RGU. As a democratic, member-led organisation, it is necessary to



					inform students of our democratic processes and structures.
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5. When we contact you

When we send marketing communications by electronic means (e.g. email) we ensure that such marketing complies with the Privacy and Electronic Communications Regulations 2003. The following rules apply when sending electronic messages that contain marketing to personal email addresses:

- RGU:Union must have consent before making any kind of marketing approach by email
- This consent must have been given directly by the recipient to RGU:Union or its agents unless it is given by someone else in the first person, such as in the following form: "I would like to be kept updated about the union's activities..."

6. Lawful purposes

- a. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- b. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the charity's systems.

7. Data minimisation

- a. The Charity shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

8. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

9. Archiving

- a. To ensure that personal data is kept for no longer than necessary, the charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

10. Security

- a. The charity shall ensure that personal data is stored securely. If it is stored electronically, modern software that is kept-up-to-date will be used.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

11. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

12. Your Rights

Under the General Data Protection Regulations, you have rights as an individual which you can exercise in relation to the information we hold about you. Individuals can find out if we hold any personal information by making a 'subject access request'. Read more about your individual rights on the Information Commissioner's Office website:

<https://ico.org.uk/for-the-public/personal-information/>.

13. Changes to this privacy statement

We keep our privacy statement under regular review. This privacy statement was last updated on 24 May 2018. You may wish to check it each time you submit personal information. If material changes are made to the Privacy Policy, for instance affecting how we would like to use your personal information, we will provide a more prominent notice. You can access this policy at any time through the link at the bottom of our website: www.rguunion.co.uk.

14. How to contact us

RGU:Union tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures. Alternatively, if you would like to report a concern to the Information Commissioner's Office (ICO) about how RGU:Union handles your personal data, more information can be found on the ICO website: <https://ico.org.uk/concerns/handling/>.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

Email us: m.collie@rgu.ac.uk

Telephone: 01224 262292

Or write to:

Data Protection

RGU Students' Union
Union Way
Garthdee Campus
Garthdee Road
Aberdeen AB10 7GE