

**Middlesex University Students’ Union – Privacy, Data Protection & Security Policy**

**INTRODUCTION**

Middlesex University Students' Union (MDXSU) exists to represent and support all students at Middlesex University, and as such, collects and utilises data relating to our student members, as well as other individuals. MDXSU is committed to protecting the privacy, data, and security of its members and stakeholders. This policy outlines the measures and guidelines implemented by MDXSU to ensure the protection of personal information, comply with data protection laws, and maintain a secure environment for all data processing activities.

As a data controller, we are required to ensure that all information held by us abides by the requirements and guidelines of the Data Protection Act 1998 (DPA), as well as with the General Data Protection Regulation (GDPR) from May 2018.

This policy applies to all personal data collected, processed, stored, or transmitted by MDXSU, regardless of the format or medium. It applies to all employees, officers, representatives, volunteers, and contractors who handle personal data on behalf of MDXSU.

The following outlines what personal data we hold and how it is used, along with guidance on your rights in relation to this. If you have any queries, please contact the MDXSU Data Protection Officer (the Communications & Marketing Manager, Camelia Purwanto) by emailing mdxsu@mdx.ac.uk.

You can also write to us at:

Middlesex Students’ Union

The Burroughs, Hendon, London,

NW4 4BT

Table of Contents

[1. WHY DOES MDXSU COLLECT PERSONAL DATA? 4](#_Toc141191900)

[2. WHAT PERSONAL DATA IS COLLECTED AND USED? 5](#_Toc141191901)

[1. Personal Data obtained through our Data Sharing Agreement 5](#_Toc141191902)

[2. Personal Data provided by you 6](#_Toc141191903)

[1. Through our website and digital channels 6](#_Toc141191904)

[2. By using our digital channels 7](#_Toc141191905)

[3. Through surveys 7](#_Toc141191906)

[4. As a staff member, former employee, or applicant: 7](#_Toc141191907)

[3. HOW LONG DOES MDXSU KEEP MY PERSONAL DATA FOR? 8](#_Toc141191908)

[1. Student Data 8](#_Toc141191909)

[2. Employee Data 8](#_Toc141191910)

[4. WILL MDXSU SHARE MY PERSONAL DATA? 9](#_Toc141191911)

[1. The third parties whom we share data with: 9](#_Toc141191912)

[1. Purpose and Necessity: 9](#_Toc141191913)

[2. Vendor Selection: 10](#_Toc141191914)

[3. Data Minimisation: 10](#_Toc141191915)

[4. Data Security: 10](#_Toc141191916)

[5. Legal Agreements: 10](#_Toc141191917)

[6. Transparency: 10](#_Toc141191918)

[7. Data Sharing Consent: 10](#_Toc141191919)

[8. Regular Auditing: 10](#_Toc141191920)

[9. Data Retention: 10](#_Toc141191921)

[10. Continuous Monitoring: 11](#_Toc141191922)

[5. HOW DOES MDXSU SECURE MY PERSONAL DATA? 12](#_Toc141191923)

[1. Restricted Access 12](#_Toc141191924)

[2. Security Measures 12](#_Toc141191925)

[3. Identity Verification 12](#_Toc141191926)

[4. Breach Notification 12](#_Toc141191927)

[6. HOW DO I MANAGE MY DATA, AND WHAT ARE MY RIGHTS? 13](#_Toc141191928)

[1. Access and Information 13](#_Toc141191929)

[2. Data Rectification and Erasure 13](#_Toc141191930)

[3. Withdrawal of Consent 13](#_Toc141191931)

[4. Opting Out of MDXSU Membership 13](#_Toc141191932)

[5. Review and Correction of Information 13](#_Toc141191933)

[6. Limitations on Information Release 14](#_Toc141191934)

# WHY DOES MDXSU COLLECT PERSONAL DATA?

MDXSU collects personal data to fulfill its responsibilities as a representative and supportive body for students at Middlesex University. The collection of personal data serves the following primary purposes:

1. **Administration and Facilitation of Elections:**
* To enable students to elect their student representatives, MDXSU collects personal data to verify student eligibility and manage the election process effectively.
1. **Student Representation:**
* MDXSU collects personal data to administer student representation on University committees and other representative bodies, ensuring effective student engagement and participation.
1. **Communication:**
* MDXSU uses personal data to send communications about MDXSU events, opportunities, services, and relevant news to students.
* Students have the option to opt out of email communications at any time by updating their account/profile preferences at [www.mdxsu.com](http://www.mdxsu.com).
* MDXSU enables student groups to communicate with their members by collecting and using personal data appropriately, facilitating effective group management and engagement.
1. **Operation of MDXSU Services and Activities:**
* Personal data is collected to facilitate the smooth operation of MDXSU services and activities, including the MDXSU Advice Service, ensuring effective support and assistance to students.
1. **Lawful purpose**
* Data may be kept to comply with legal aspects of the organisation, such as the registration of trustees or passing on Safeguarding data.
1. **Reports and Evaluations:**
* MDXSU generates reports and evaluations to analyse student engagement with MDXSU and the overall student experience at Middlesex University. Personal data is utilized to gather insights and improve services.
1. **Operation of** [**www.mdxsu.com**](http://www.mdxsu.com)
* Personal data is collected to operate the features and functionality of the MDXSU website ([www.mdxsu.com](http://www.mdxsu.com)), ensuring a seamless user experience and access to relevant information.

In addition to current students, MDXSU may also process personal data of current and past employees, applicants, staff members at Middlesex University, Middlesex University alumni, advertising partners, and the general public. This data is processed to facilitate recruitment, comply with employment laws, and support the staff of the Students' Union.

# WHAT PERSONAL DATA IS COLLECTED AND USED?

The data collected falls into some or all the following categories:

|  |  |  |
| --- | --- | --- |
| **Contact Information (1)** | **Activity Information (2)**  | **Personal/Sensitive information (3)** |
| First name | Age (including age range) | Racial or ethnic origin |
| Surname | Type of study | Political opinions |
| University ID | Level of Course | Religious beliefs |
| (MOOXXXXX) University  | Name  | Trade union membership |
| User ID | Department | Physical or mental health details |
| Mobile phone number | Faculty | Sexuality |
| Email address | School | Criminal offences  |
| Next-of-kin contact details | Term time address | Advice casework records |
|   | Home address | Employment records |
|   | Bank details / card details | Membership information |
|   | Membership information | Campaign activity |
|   | Advice casework details |   |
|  |  |  |

## Personal Data obtained through our Data Sharing Agreement

By enrolling at Middlesex University, you automatically become a member of MDXSU, and your data is shared with MDXSU by the University. This data sharing is essential to fulfil legal obligations and serve the legitimate interests of the students. The data is shared in accordance with the terms outlined in this policy and the [Data Sharing Agreement](http://www.mdxsu.com/resources/mdxsu-mdx-data-sharing-agreement/download_attachment) between MDXSU and Middlesex University.

If you are a student at Middlesex University London, certain contact (1) and activity information (2) is obtained through the [Data Sharing Agreement](http://www.mdxsu.com/resources/mdxsu-mdx-data-sharing-agreement/download_attachment) between MDXSU and Middlesex University. However, students have the option to opt out of their membership of Middlesex Students' Union by sending an email to mdxsu@mdx.ac.uk

The data obtained through this agreement includes the following:

1. **Contact Information:**
* Title
* Last name
* First names
* Student ID
* IT User ID
* Date of birth
* Gender
* University Email Address
* Residential Category
* Term-time address (postcode only)
1. **Academic Information:**
* Programme name, programme code, department, and faculty/school
* Academic year
* Level of study (undergraduate, postgraduate, etc.)
* Admit term (start and end dates)
* Mode of attendance (full time, part time, sandwich, etc.)
* Enrolment status
* Student campus location
* Academic progress, including module outcomes, progression, and qualifications awarded

Please note that sensitive information (3) is not shared between the University and MDXSU unless it is necessary for the operation of the MDXSU Advice Service.

For full details regarding the data sharing arrangement between MDXSU and Middlesex University, you can access the MDXSU and Middlesex University Data Sharing Agreement [here.](http://www.mdxsu.com/resources/mdxsu-mdx-data-sharing-agreement/download_attachment)

## Personal Data provided by you

### Through our website and digital channels

When accessing our website, you may be requested to provide information about yourself, including contact (1) and activity (2) data. This may include your name, contact details, and credit or debit card information when making purchases or registering for events. Joining certain student groups, such as our Liberation groups for disabled students, women students, LGBT+ students, and those of African, Arab, Asian, or Caribbean heritage, may involve the disclosure of sensitive information (3). By providing us with your details during registration, ticket purchases, group membership, election nominations, and other activities, you consent to MDXSU using your personal data in accordance with this policy. During website registration, you have the option to opt into communications from the Students' Union, and you can modify your preferences at any time.

If you send us information about yourself via email or web-based forms, you consent to the collection of this personal data. We may retain the content of your email messages, your email address, and any ongoing responses. Additionally, when you contribute user content on [www.mdxsu.com](http://www.mdxsu.com), you consent to the collection and use of the personal data associated with that content.

### By using our digital channels

We may collect anonymous information transmitted by your browser as part of a web page request, which may include cookies. This information is collected in a way that does not personally identify you and is used to enhance the user experience on our website.

Please note that we are not responsible for the websites linked to or from our website, including the information or content contained therein. Your browsing and interaction on any other website, even those linked on our website, are subject to the respective website's rules and policies. Our Privacy Policy is not applicable in such cases.

### Through surveys

By participating in MDXSU surveys and submitting your responses, you consent to providing personal data and opinions as requested. The collection and use of this data will be clearly communicated to you when you choose to participate and will be in accordance with this policy.

### As a staff member, former employee, or applicant:

Middlesex Students' Union collects contact (1), activity (2), and personal (3) information to facilitate recruitment and support employees in accordance with employment law. The collected data includes:

1. **Initial application:**
* Name and address
* National Insurance number
* Contact details (telephone number, email address)
* Permission to work in the UK (self-declaration)
* Relevant qualifications or highest qualifications attained
* Professional development/training and membership of professional bodies
* Employment history
* Supporting statement
* Referee details
* Criminal record disclosure
* Equal Opportunities monitoring data (gender, date of birth, nationality, marital status, sexual orientation, religious belief, ethnicity)
* Declaration of any disability as defined under the Equality Act 2010
1. **Once a candidate has been offered employment:**
* Bank details
* Emergency contact details
* Qualification information required for reporting to HESA
* Equal opportunities monitoring data (as described above)
* Health information
* Some positions may require completion of a DBS compliance check

# HOW LONG DOES MDXSU KEEP MY PERSONAL DATA FOR?

At MDXSU, we have a strict policy of retaining personal data only for as long as necessary. We ensure that personal data is securely destroyed once the relevant retention period has ended. Currently, the retention periods for different categories of data are as follows:

## Student Data

The majority of student data is retained for a period of one year after graduation. After this period, the data is securely destroyed to protect your privacy.

## Employee Data

Employee data is retained for a maximum of eight years. This period aligns with legal requirements and allows us to fulfil our obligations as an employer.

It's important to note that these retention periods are subject to change in accordance with legal obligations, regulatory requirements, and best practices. We regularly review and update our retention policies to ensure compliance with applicable laws and industry standards.

MDXSU takes data privacy and security seriously. We implement appropriate technical and organizational measures to protect personal data during its retention period, and we ensure its secure disposal when it is no longer required.

# WILL MDXSU SHARE MY PERSONAL DATA?

MDXSU is committed to protecting your personal data and will not sell or trade it with third parties. We prioritise the confidentiality and security of your information. However, there are instances where it may be necessary to share your data to provide certain services or fulfil our obligations. In such cases, we ensure that the sharing of data is done in a responsible and lawful manner.

We may share your data with third-party service providers who assist us in delivering our services. For example, we collaborate with UnionCloud, our website provider, to allow students to log in, purchase tickets, and join groups. In these instances, data sharing is essential to facilitate these activities.

Rest assured that any sharing of your personal data will always be based on legitimate interests or with your explicit consent or another relevant legal basis. We carefully assess the necessity and legality of data sharing before entering any arrangements.

MDXSU maintains a comprehensive data protection framework to safeguard your personal data. We ensure that all third-party recipients of your data adhere to strict data protection standards and contractual obligations to protect your privacy.

## The third parties whom we share data with:

Certain services and functionalities necessitate collaborating with trusted third-party partners. When engaging in third-party data sharing, we prioritise data protection and privacy to ensure the security and integrity of personal information. Here's how we handle third-party data sharing:

### Purpose and Necessity:

MDXSU only shares data with third parties when it is necessary to provide specific services or enhance the overall student experience. Data sharing is limited to essential information required for the designated purpose and aligned with the individual's consent or legitimate interests.

### Vendor Selection:

We carefully evaluate and select third-party vendors, partners, or service providers based on their commitment to data protection, compliance with relevant regulations, and adherence to industry best practices. Vendors are contractually obligated to handle data in accordance with MDXSU's policies and data protection requirements.

### Data Minimisation:

MDXSU ensures that only the minimum amount of personal data necessary for the intended purpose is shared with third parties. We prioritise data minimization to reduce the risk of unauthorised access or misuse of personal information.

### Data Security:

We hold third-party partners to the same stringent data security standards as MDXSU. We require them to implement appropriate technical and organisational measures to protect data from unauthorized access, alteration, or disclosure.

### Legal Agreements:

Before engaging in any data sharing with third parties, MDXSU establishes clear and legally binding agreements outlining the purpose of data sharing, the data to be shared, the responsibilities of the third party, and the measures in place to ensure data protection.

### Transparency:

We are transparent about third-party data sharing practices, and we inform individuals about the involvement of third parties and the purposes of data sharing in our privacy notices and communications.

### Data Sharing Consent:

For certain activities where data sharing is not strictly necessary, we obtain explicit consent from individuals before sharing their personal data with third parties. Consent is sought in a clear and unambiguous manner, giving individuals the option to decline data sharing.

### Regular Auditing:

MDXSU conducts regular audits of third-party data sharing activities to ensure compliance with contractual obligations and data protection regulations. Any discrepancies or issues identified are promptly addressed.

### Data Retention:

We ensure that third-party data recipients adhere to the same data retention policies as MDXSU. Personal data shared with third parties is retained only for the duration required to fulfil the agreed-upon purpose.

### Continuous Monitoring:

MDXSU continuously monitors third-party data sharing practices to ensure ongoing compliance with data protection standards and to address any emerging risks or changes in the data sharing landscape.

|  |  |
| --- | --- |
| **Partner**  | **Purpose** |
| Student groups at MiddlesexUniversity | If you opt into membership of one of the student groups, communities, or societies that MDXSU supports, you are consenting to your personal data (received through our Data Sharing Agreement and/or your account on our website) being shared with the relevant group committee. This is for the committee to manage memberships and send communications to their members. All membership lists remain within UnionCloud.  |
| Middlesex University  | MDXSU shares staff data (including student staff) with the University Human Resources team to process pay roll. MDXSU may share information with Middlesex University or a third party in the event of an accident or injury or alleged criminal activity |
| National Union of Students | Each year, students vote to decide which students will represent MDX at the NUS National Conference. We will share the details of the elected NUS Delegates with the National Union of Students’. MDXSU is affiliated to the National Union of Students (NUS). When creating an account on www.mdxsu.com, you can choose to opt into emails from NUS.  |
| UnionCloud - OneVoice Digital (website platform and data management system)   | MDXSU uses the NUS Digital UnionCloud platform to provide our website functionality and to store membership data. This enables students to purchase or book ticket, join groups, vote for representatives, and submit ideas. We also use UnionCloud to process payments and send email communications, and to analyse engagement.  |
| AdvicePro - AdviceUK  | We use a platform called AdvicePro to manage our Advice Service. The software helps us to keep track of student cases and contactthe students. www.advicepro.org.uk/privacy-policy/ |
| SurveyHero | We use this platform to administer our surveys and collect feedback from students via SurveyHero.com, who support us with free use of their online survey software. www.surveyhero.com/privacy |
| Google Analytics | MDXSU uses Google Analytics to help understand use of www.mdxsu.com. This service collects the information sent by your browser as part of a web page request, including cookies and your IP address, and their use of it is governed by their Privacy Policy. Visitor information collected by Google Analytics may be used by Google for the purposes of enhancing their products and providing you with personalised services. You can opt out of Google Analytics collecting information about you by using the Google Analytics Opt-Out Browser Extension.  |
| Providing a reference to other companies/employers | If requested by a current or past member of full-time or student staff, we will provide a reference for the individual concerned.  |

Further to this, information you provide to us may be provided to third parties and/or retained in an aggregate statistical format, where an individual cannot be identified.

# HOW DOES MDXSU SECURE MY PERSONAL DATA?

At MDXSU, we prioritise the protection of your personal data and adhere to stringent measures to ensure its security. Here's how we safeguard your information:

## Restricted Access

Your personal data is accessible only to authorised MDXSU staff members who require access to perform their designated roles. We limit access to your data to those individuals who need it to provide you with the requested services. Third-party access is also strictly regulated and only granted where necessary, as specified in our previous policy.

## Security Measures

We implement appropriate technical and organisational security measures to prevent the loss, unauthorised access, or misuse of your personal data. These measures include secure storage systems, encryption, firewalls, and regular security audits. Our aim is to protect your information from unauthorized disclosure or alteration.

## Identity Verification

To ensure the privacy and security of your data, we take reasonable steps to verify your identity before granting access to your account. This may involve requesting a unique password or additional authentication methods. It is important that you maintain the confidentiality of your password and account information, and control access to your email communications from MDXSU.

## Breach Notification

In the unfortunate event of a security breach resulting in the compromise of personal information, MDXSU will promptly notify the affected individuals in accordance with the notification procedures specified by Middlesex University. We take breach incidents seriously and work diligently to rectify the situation. Additionally, if required by applicable laws and regulations, we will report the breach to the [Information Commissioner’s Office (ICO).](https://ico.org.uk/)

We are committed to continuously reviewing and enhancing our data protection practices to staying up-to-date with the latest security standards and legal requirements. Your trust and privacy are of utmost importance to us.

# HOW DO I MANAGE MY DATA, AND WHAT ARE MY RIGHTS?

At MDXSU, we respect your rights and provide you with control over your personal data. Here's how you can manage your data and understand your rights:

## Access and Information

You have the right to request access to the personal data that we hold about you and understand how it is processed. This allows you to review the information we have and verify its accuracy.

## Data Rectification and Erasure

If you believe that the personal data we hold about you is inaccurate or incomplete, you have the right to request its rectification. Additionally, in specific circumstances, you have the right to request the erasure of your personal data. We will assess these requests in accordance with applicable laws and regulations.

## Withdrawal of Consent

You have the right to withdraw your consent for MDXSU to store or process your personal data at any time. If you choose to withdraw your consent, please note that certain services may no longer be available to you, but this will not affect your rights as a SU member.

## Opting Out of MDXSU Membership

As a student, you have the option to opt out of MDXSU membership by contacting us directly at mdxsu@mdx.ac.uk. In such cases, we may retain your profile information and user content for a reasonable time for statistical purposes.

## Review and Correction of Information

To review or correct the information MDXSU holds about you, please contact us at mdxsu@mdx.ac.uk. We will respond to your request within one month from the date of receipt, although complex requests may require up to three months for a response. Subject access requests are free of charge.

## Limitations on Information Release

In certain circumstances, MDXSU may be unable to release information to you, such as when it contains personal data about another client or third party. In such cases, we will inform you of your right to lodge a complaint and appeal to a higher, judicial authority.

We are committed to ensuring that your data rights are respected and will handle your requests in a timely and transparent manner.