Middlesex University Students' Union – Privacy 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 your information and processing individuals' data lawfully and fairly, and will always ensure that personal data is collected, handled, stored and shared in a secure manner.

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.

The following notice 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 & Income Manager, Laura Higgs) by calling +44 (0) 20 8411 6450, or by emailing mdxsu@mdx.ac.uk.

You can also write to us at:

Middlesex Students' Union The Burroughs, Hendon, London, NW4 4BT

WHY DOES MDXSU COLLECT PERSONAL DATA?

The majority of personal data we process relates to current students at Middlesex University. In order to fulfill our duties as a Students' Union – representing and supporting students – we require student data for the following primary purposes:

- Administration and facilitation of elections, enabling students to elect their student representatives
- Administration of student representation on University committees and within other representative bodies
- Sending of communications regarding MDXSU events, opportunities, services and relevant news

- You may opt out of email communications at any time by updating your <u>account/profile</u> <u>preferences</u> at <u>www.mdxsu.com</u>.
- Operation of MDXSU services and activities, including the MDXSU Advice Service
- Generation of reports and evaluations to analyse student engagement with MDXSU, and, more widely, the experience of students at Middlesex University
- Enabling our student groups to communicate with their members
- Operating features and functionality of <u>www.mdxsu.com</u>

MDXSU also processes personal data for current and past employees, as well as applicants, in order to facilitate recruitment, follow employment laws and support Students' Union staff. Other data may relate to staff members at Middlesex University, Middlesex University alumni, advertising partners and the general public.

WHAT PERSONAL DATA IS COLLECTED AND USED?

The data we collect falls into some or all of the following categories:

Contact Information (1)	Activity Information (2)	Personal/Sensitive information (3)
First name	Age (including age range)	Racial or ethnic origin
Last name	Type of study	Political opinions
University ID (MOOXXXXX)	Level of study	Religious beliefs
University User ID	Course Name	Trade union membership
Mobile phone number	Department	Physical or mental health
Email address	Faculty	Sexuality
Next-of-kin contact details	School	Criminal offences
	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 with Middlesex University, you also become a member of Middlesex Students' Union, and your data is provided to MDXSU from the University. As well as being necessary to comply with legal obligations and for the legitimate interests of the students. The data is shared is in accordance with this policy and its terms, and the <u>Data Sharing Agreement</u> between MDXSU and Middlesex University.

This means that if you are a student at Middlesex University London, some of your contact (1) and activity information (2) is obtained through a <u>Data Sharing Agreement</u> between MDXSU and Middlesex

University. Students can choose to opt out of their membership of Middlesex Students' Union at any time by emailing mdxsu@mdx.ac.uk.

The data obtained is outlined as follows:

- Title
- Last name
- First names
- Student ID
- IT User ID
- Date of birth
- Gender
- University Email Address
- Residential Category
- Term-time address (postcode only)
- 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

Sensitive information (3) is not shared between the University and MDXSU unless necessary for the Students' Union to operate the MDXSU Advice Service.

You can view the MDXSU and Middlesex University Data Sharing Agreement in full here.

Personal Data provided by you

Through our website and digital channels:

By accessing our website you may be asked to provide information about yourself, including contact (1) and activity (2) data – such as your name, contact details and/or credit or debit card information. Joining some of our student groups – for example, our Liberation groups for disabled students, women students, LGBT+ students and those of African, Arab, Asian or Caribbean heritage - could be seen as a disclosure of sensitive information (3).

By providing us with your details when registering, purchasing tickets, joining groups, nominating yourself for election and other activities, you consent to MDXSU using your personal data in accordance with this policy. When registering on our website, you have the option to opt into communications from the Students' Union. You can change your preferences at any time.

If you send us information about yourself by email, including through web-based forms, you consent to the collection of this personal data and we may retain the content of your email messages, your email address and any ongoing responses. You may also provide us information in user content you post to www.mdxsu.com, and in doing so consent to the collection and use of this personal data.

By using our digital channels:

We may collect anonymous information sent by your browser as part of a web page request, including cookies. We collect this information in a way which does not identify anyone, and use it in order to improve the user experience of browsing and navigating our site.

Please note that we are not responsible for websites linked to or from our website, nor the information or content contained therein. Your browsing and interaction on any other website, including those that have a link on our website, is subject to that website 's own rules and policies, and our Privacy Policy is no longer in effect.

Through surveys:

By completing any MDXSU surveys and submitting your responses, you consent to providing personal data and views as requested therein. The collection and use of this data will be made clear 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 data collected is outlined below:

- Initial application:
 - Name and address
 - National Insurance number

- Contact details (telephone number, email address)
- Self-declaration of permission to work in the UK
- o Relevant qualifications or indication of highest qualification held
- o Professional development/training and membership of any professional body
- 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 about any disability as defined under the Equality Act 2010
- Once a candidate has been made an offer of employment:
 - Bank details
 - Emergency contact details
 - Qualification information required to be shared with HESA
 - Data captured for equal opportunities monitoring (as above)
 - Health information
 - o Certain positions also require a DBS compliance check to be completed

HOW LONG DOES MDXSU KEEP MY PERSONAL DATA FOR?

We do not hold onto personal data for any longer than is necessary, and ensure that it is destroyed once the relevant time period has elapsed. At present, the majority of student data is destroyed one year after graduation, while employee data is retained for a maximum of eight years.

WILL MDXSU SHARE MY PERSONAL DATA?

Middlesex Students' Union will not sell or trade your personal data, and will not share any data unless it is necessary in order to provide services. However, we will share data with third parties where this is in the legitimate interest of fulfilling relevant services. For example, data is shared with UnionCloud – who provide our website – in order for students to log in and purchase tickets and join groups, amongst other purposes.

Where data is shared, this will always be undertaken for the purposes of legitimate interest, or with the direct consent of the individual or other relevant legal gateway.

The third parties whom we share data with are listed below:

Partner	Purpose	
Student groups at Middlesex University	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 in order 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 in order 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	
Community Placement partners	Our Community Placement scheme provides students paid, part- time internships which utilise their skills and experience, while also benefitting local organisations. In order to facilitate recruitment and/or employment, student applications will be shared with the relevant partner organisation.	
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'.	
	Middlesex Students' Union 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 contact the 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 PROTECT MY PERSONAL DATA?

In order to ensure that your personal data is protected, and that we are acting in accordance with data protection guidelines, your personal data is available only to relevant members of MDXSU staff with authorized access, unless in the case of the third-parties as specified above. We utilise appropriate security measures to prevent loss or unauthorised use of sensitive information.

To protect your privacy and security, we take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from MDXSU, at all times.

In the event that personal information is compromised as a result of a breach of security, MDXSU will promptly notify those persons whose personal information has been compromised, in accordance with the notification procedures as instructed by Middlesex University. Where necessary we will also inform the <u>Information Commissioner's Office (ICO)</u>.

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

Under data protection regulations, you have the right to obtain access to personal data that we store about you, and find out how it is processed. You also have the right to prevent further processing or even request erasure in specific circumstances.

You also have the right to withdraw consent from MDXSU storing or processing your personal data at any time, and can, of course, also decline to submit personally identifiable information to MDXSU. In these cases, we may not be able to provide certain services to you – such as sending e-tickets to confirm an event booking, or enabling you to join a society or student group.

As a student, you may choose to opt out of MDXSU membership at any time by contacting us directly at mdxsu@mdx.ac.uk. We may archive your profile information and user content for a reasonable time for statistical purposes.

To review or correct information that MDXSU has about you, you will also need to contact us at mdxsu@mdx.ac.uk. You will receive a reply no later than one month from the date the request is received, though complex requests may take up to three months. Subject access requests are free.

There may be circumstances in which MDXSU cannot release information to you, such as where it contains personal data about another client or third party. In this event we will advise you of your right to complain and lodge an appeal with a higher, judicial authority.