

GDPR Privacy notice for Customers

Last Revised: 26 November 2018

What is the purpose of this document?

Solent Students' Union and Solent Students' Union Trading Limited is committed to protecting the privacy and security of your personal information. Solent Students' Union is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This privacy notice describes what to expect when Solent Students' Union collects or processes personal information.

All data is held in accordance with the guidelines set out in the General Data Protection Regulations (GDPR) and the Privacy of Electronic Communications Regulation.

It applies to information we collect about:

- Customers and members
- Users of our website
- People who give us feedback or complete questionnaires, polls or surveys

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

What data do we collect about you?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

When you become a Customer

Each time you register for an event ticket online there is certain information that our sales platform partners Fatsoma Ltd will need to fulfil our service to you. At the point of registration, Fatsoma Ltd request certain information which is required to enable us to process your ticket order and notify you of its progress. Sharing this data enables Fatsoma Ltd to fulfil its contracted duty to provide a service to Solent Students' Union as well as observing the legitimate interests of customer to offer the services provided by the Union.

When you register for a paid event, you will provide financial information (e.g. your credit card number and expiration date, billing address etc.). This information is processed by Fatsoma Ltd. Solent Students' Union and Solent Students' Union Trading Ltd do not have access to this data.

We collect, store, and use the following personal information about you:

- name
- email address
- telephone number
- postal address

This information is shared securely by Fatsoma Ltd with Solent Students' Union through a secure login to the Fatsoma application for the purpose of ticket redemptions, event entry and event updates only, we require them to observe the requirements of all data protection legislation.

We use this information to:

- Carry out our contracted obligations as a retailer to you.
- Provide access to our services and activities.
- To contact you about event information and updates or cancellations.
- To communicate with you about events and offers which we feel would benefit you.

Each time you register for our lottery there is certain information that our lottery providers Sterling Management Centre Ltd (Unity Lottery) will need to fulfil our service to you. At the point of registration, Sterling Management Centre Ltd (Unity Lottery) request certain information which is required to enable us to process your lottery entry and notify you of its progress. Sharing this data enables Sterling Management Centre Ltd (Unity Lottery) to fulfil its contracted duty to provide a service to Solent Students' Union as well as observing the legitimate interests of customer to be offered the products and services provided by the Union.

When you register for the lottery, you will provide financial information (e.g. your bank details, billing address etc.). This information is processed by Sterling Management Centre Ltd (Unity Lottery) and Solent Students' Union do not have access to this data.

We collect, store, and use the following personal information about you:

- name
- email address
- telephone number
- postal address
- date of birth (to clarify legal status to play a lottery in the UK)

This information is shared securely by Sterling Management Centre Ltd (Unity Lottery) with Solent Students' Union so we can provide you with updates about the charity, we require them to observe the requirements of all data protection legislation.

We use this information to:

- Carry out our contacted obligations as a retailer to you.
- Provide you with updates about the charity.

Each time you use the Safe Solent taxi service, you will supply your personal data at the point of booking to fulfil the service to you. This data is collected by Radio Taxis (Southampton) Ltd to deliver a free and safe taxi service to Solent University students who study late at night for the added security of getting them home safely. As part of this process and the legal obligations of Radio Taxis (Southampton) Ltd for their licensing certain personal data is taken.

When Radio Taxis (Southampton) have fulfilled the service to the customer they send over itemised invoices of its usage to Solent Students' Union for billing and analysis purposes. This data is analysed to make sure that the service is both financially viable and in line with what the customer wants.

We collect, store, and use the following personal information about you:

- name
- telephone number
- address

This information is shared securely by Radio Taxis (Southampton) Ltd with Solent Students' Union so we can pay for this service for our customers and analysis the usage of the service to make sure that it is both sustainable and efficient.

We use this information to:

- make sure that the service is in line with the needs of our members
- pay for the service for our customers

When you give it to us INDIRECTLY

Your information may be shared with us by independent organisations, for example event partners or our own trading company. These independent third parties will only do so when you have indicated that you have given consent to share this data with us. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

When you give permission to OTHER ORGANISATIONS to share

We may combine information you provide to us with information available from external sources in order to gain a better understanding of our members to improve our communication methods, products and services.

The information we get from other organisations may depend on your privacy settings or the responses you give, so you should regularly check them. This information comes from the following sources:

Third party organisations

You may have provided permission for a company or other organisation to share your data with third parties such as the Students' Union. This could be when you buy a product or service, register for an online competition or sign up with a comparison site.

Social Media

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.

Information available publicly

This may include information found in places such as Companies House and information that has been published in articles or newspapers.

When we collect it as you use our WEBSITES

Like most websites, we use cookies to help us make our site – and the way you use it – better. Cookies mean that a website will remember you. They're small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields. There are more details in our [Cookies Statement](#) which can be found at www.solentsu.co.uk/privacy

In addition, the type of device you're using to access our website and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have and what operating system you're using. Your device manufacturer or operating system provider will have more information in their privacy policy.

Why do we collect the data and what is our legal basis for doing so?

We will only use your personal information when the law allows us to.

When we process your data we will have already carefully assessed the lawful reason for doing so, the reasons for which the data is processed, the length of time the data is held for, the secure storage of your data and undertaken assessments to ensure your rights are delivered.

Developing a better understanding of our customer through your personal data allows us to make better decisions, communicate more efficiently and, ultimately, helps us to reach our goal of every student having an excellent experience at Solent University.

Depending on the activity your data is used for, we rely on a number of conditions for processing.

- We have to comply with legal obligations for example to provide you with representation and access to our services and activities, to meet our obligations under health and safety law or insurance requirements to use our vehicles.
- It is necessary to fulfil a contract with you for example if you join one of our societies or want to work at the Students' Union.
- You have given your consent for example to stand in an election to become an officer or to become a society committee member.
- We have a legitimate interest for example to use photographs of our members at events, to report to the wider membership on what we are doing or using statistical data from our advice service to improve the experience of students at the University. We carefully balance your rights when we think there is a legitimate interest in processing data.
- We may need to protect your or someone else's interests for example if you are injured during one of our events or activities.

Some of the grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Who do we share your data with?

We only share information when there are lawful grounds for doing so. For example we may share:

- Third party providers of services such as MSL who provide our website and require our membership register to administer our online voting platform or AdvicePro who provide a case management system for our Advice Service
- The police if there are ongoing criminal investigations
- Google if we are using google analytics for the purpose of reporting
- Legal advisors

We require third parties to respect the security of your data and to treat it in accordance with the law. We may transfer your personal information outside the EU for any of the purposes described in this notice. If we do, you can expect a similar degree of protection in respect of your personal information. Sensitive personal data will not be shared with third parties without your express consent unless required by law or in your vital interests in an emergency.

Marketing & Communications Preferences

Membership Communications

As a customer we believe you have a legitimate interest in hearing from us about the products and services we offer, what we're doing to represent you and opportunities that might be of interest to you. You may opt out of these communications at any stage by clicking the unsubscribe link contained within the email.

Direct Marketing

As a charity we need to fundraise to provide the services we offer to Solent University students we do this through our trading company (Solent Students' Union Trading Ltd) which is a social enterprise. We send marketing material on behalf of our trading company to our members and customers after gaining consent from them via email. We include information on how to opt in when we send you our original consent emails. If you don't want to hear from us just let us know. We do not sell or share personal details to third parties for the purposes of marketing.

How long will you retain my information?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for but may retain your personal data for a period of up to six years after your purchase.

Understanding the detail of our data security measures

When we process your data we will have already carefully assessed the lawful justification for doing so, the parameters in which the data is processed, the length of time the data is held for, the secure storage of your data and undertaken impact assessments to ensure your rights are delivered.

The Students' Union operates a Data Protection and Information Security Policy which is supported by a practical handbook for our employees and volunteers. All employees and volunteers handling data are required to undertake general data protection training and third parties handling data are required to provide a contract which meets the requirements of the Information Commissioner's Office.

Your rights in relation to the data we hold

You have a right to ask us to stop processing your personal data, and if it's not necessary for the purpose you provided it to us for (e.g. processing your membership or registering you for an event) we will do so.

Contact us on 02382 013389 or students.union@solent.ac.uk if you have any concerns.

You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

If you want to access your information, you must complete the **Subject Access Request Form** which you can download from www.solentsu.co.uk/privacy. Please send this by post with a description of the information you want to see and the required proof of your identity to:

Data Protection
Solent Students' Union,
East Park Terrace,
Southampton,
Hampshire,
SO14 0YN.

We do not accept these requests by email so we can ensure that we only provide personal data to the right person.

If you want to opt-out of all communications and data processing you will be required to surrender your membership to the Students' Union, which will limit your access to activities and services. You can do this by writing to the Union President or Solent University Student Records department via student.registry@solent.ac.uk

If you have any questions please send these to students.union@solent.ac.uk

You have the right to make a complaint at any time to the UK regulator for data protection issues:

Information Commissioner's Office (ICO)
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

0303 123 1113

Website: www.ico.org.uk

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO.

Geoffrey Sturgess
Warner Goodman Commercial
8 College Place
London Road
Southampton
SO15 2FF

Changes to this privacy notice

We may change this privacy from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our website or by contacting you directly.