

<b>Version Number</b>	<b>Purpose/Change</b>	<b>Author</b>	<b>Date</b>
<b>1.0</b>	<b>Data Privacy for Enquirers</b>	<b>Data Governance Team</b>	<b>December 2023</b>

**Privacy Statement** - By submitting this form, I (enquirer) acknowledge that I have read and agree to the University of Suffolk Privacy Policy. I understand that this policy outlines how the University of Suffolk collects, uses, and safeguards personal information provided through this web form. I consent to the terms and practices described in the policy.

### **Privacy Notice for Enquirers**

The General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (and, where applicable, EU GDPR) governs the way that organisations use personal data. Personal data is information relating to an identifiable living individual.

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

- how and why the University uses your personal data,
- what your rights are under GDPR, and
- how to contact us so that you can exercise those rights.

We keep our privacy policy under regular review. Any changes we make to our policy in the future will be posted on this page and, where appropriate, notified to you by email or post.

Please check back frequently to see any updates or changes to our privacy policy.

### **Data protection principles**

- We will comply with data protection law and principles, which means that your data will be:
- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

## Who are we?

The University of Suffolk is an institution dedicated to transformation – transforming individuals, our community, our region and beyond. Education, training and research are powerful tools to support transformation and change and to fulfil these obligations the University collects, stores, processes and shares personal data.

This privacy notice makes you aware of how and why your personal data will be used, as an enquirer of the University of Suffolk, and how long it will usually be retained for. The University of Suffolk is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you.

## Our Lawful basis for using the data is/are:

- Necessary for Legitimate interests - occasionally, we may need to use your personal data to pursue our legitimate interests. Some of these interests includes direct marketing, campaigns, and advertising, sending out personalised communications to you based on your interest.
- Necessary for Contract - there are some kinds of communications we would not want users to opt out of such as their confirmation to their booked event or receipt of their offer letters.
- Necessary for Vital Interests – We may use your personal information in situations where we need to provide accessibility to our facilities during events such as campus tours, open days or taster sessions.
- Necessary for the Performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. We may process your personal data for statistical and research purposes, e.g conversion activities for the marketing team.
- We will process your data on the basis of your Consent (enquirers). For example, to provide you with more information regarding events at the university or for the sake of widening participation. You will be asked to provide your consent using a clear concise message and an opt in statement.

## Why are we processing your personal data?

We collect and process your information to respond to your enquiry or event booking and manage our student recruitment services and processes.

We may also use the information you provide us in other ways:

- To compile statistics and conduct research in relation to enquirers for the purpose of planning and improving our processes., (but not to make any decisions about you).
- To send you communications (mail, email, phone, text, post) about events on and off campus i.e open days, taster days, workshops and inform you about the support and benefits available to University of Suffolk students.

Under the General Data Protection Regulation (GDPR) our processing is necessary for the performance of your student contract and for the legitimate interests of the University.

### **How your data is collected**

- Your data is collected from the information you provide us when you interact with us before applying, i.e enquiry forms, prospectus requests, event bookings, telephone calls, emails, applications you make directly to the University or through applications you make through a third party or agent. Please check with your application agent regarding their Data protocols.
- Additional information is collected from third parties such as UCAS, former places of education, agents/agencies, sponsors, and government departments.

### **The data we hold about you and how it is used.**

The University will collect information about you to provide services to you as an applicant or student. These details will include, but are not limited to:

- Contact details and other information submitted at key points through your University journey e.g. at enquiry, application.
- Health information (where applicable) includes information about health conditions or Disabilities (also for people you are bringing to an event so as to provide for their needs adequately). You may also provide this information to us as part of the equality monitoring, we carry out pursuant to our legal obligations under the Equality Act 2010 and is only given voluntarily.
- Country of domicile so as to ascertain your status and profiling for the purpose of communication.
- Details of courses of interest, level of interest, subject of interest and year of entry, this allows us to send you more personalised communications.
- Communications you have with us and communications we generate for you.

### **Your data will, or may, be shared with the following recipients or categories of recipient:**

Within the University, access to enquirer data is restricted to those who need it in order to carry out their role. This may include student recruitment officers, marketing business partners and student ambassadors who support the delivery of university services.

We need to disclose personal and special category 'sensitive' personal data to some external bodies as part of our statutory functions as required by law. These organisations are Data Controllers for your data, except where explicitly stated otherwise. Under these conditions, your data may be provided to organisations including but not limited to:

<b>Individual/ Category of Recipient</b>	<b>Details and linked documents</b>
--	-------------------------------------

Event venue providers	A variety of venues used and privacy notices of these are to be considered when using/visiting
Access agreement	Azorus may contain Special Category data such as ethnicity or race for Outreach/Widening Participation reporting for the 'Access Agreement
Cookies & Cookie similar technologies	Azorus, the CRM provider, employs cookie-like technologies intermittently, including web beacons, SDKs, pixels (or “clear gifs”), and various tracking tools. Each email sent by Azorus is embedded with single pixel gifs, also referred to as web beacons. These minute graphic files contain distinct identifiers, facilitating the University of Suffolk and Azorus in recognizing instances where our Contacts have opened an email or clicked on specific links. These technologies meticulously record details such as the Contact's email address, IP address, date, and time associated with each open and click within a campaign. Azorus leverages this data to compile comprehensive reports for the University of Suffolk, shedding light on the effectiveness of an email campaign and outlining the actions undertaken by Contacts.

### How your data is stored internally

Generally, information you provide to us is stored on our secure servers, or on our cloud-based systems. These are located within the UK or in countries/areas which are considered to have adequate privacy and information security provisions, such as the European Economic Area (EEA). However, there are times when we will need to store information outside these locations to fulfil our purposes and where we do, we will carry out transfer risk assessments to ensure that appropriate security measures are taken to protect your privacy rights. This may mean imposing contractual obligations on the recipient of your personal information where no other relevant safeguards exist. Technical measures such as encryption will also be considered.

Some processing of your information may be undertaken on the University's behalf by third party organisations. Organisations processing personal data on the University's behalf are also bound by the GDPR and the University has sought assurances from these organisations to ensure they are aware of their obligations under the GDPR and resulting legislation.

We currently use Azorus CRM for processes such as Data storage , Direct marketing, Event management, Profiling and Reporting. Data is stored outside of the EEA in Canada. Canada has “adequacy” status from the European Commission, which determined in 2001 that

Canada's law under PIPEDA (the Personal Information Protection and Electronic Documents Act) was strong enough to satisfy that any data transferred from the EU to Canada would be adequately protected.

Azorus uses Contractual as a Lawful basis for sending 'System emails' which are triggered by events such as event bookings, form completions or being imported from a 3rd party enquiry system. If you object to Profiling and Reporting, this effectively ends the service, and your data will need to be anonymised. You will no longer be able to benefit from the service. If you also objects or withdraw consent for Direct Marketing then this is handled by the Preference Centre, the Opt out on the bottom of emails, or within the UI.

The University is required under data protection legislation to keep your information secure, and measures are in place to prevent unauthorised access and disclosure of your information. Only relevant members of staff who require access to your records will be authorised to do so. Systems and electronic files are subject to password restrictions and other security measures. Any paper files will be stored in secure areas with controlled access.

### **How long is the data kept for?**

We retain your personal data for a maximum of 3 years, as we understand that your original enquiry to study may be for a later academic year, and if this is not the case, we would like to hold for the application cycle plus two additional years for research purposes.

### **Data Subject Rights including withdrawing consent**

One of the aims of the General Data Protection Regulation (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 erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

All personal data will be processed in accordance with the Data Protection Act 2018 and General Data Protection Regulation. If you have any queries or concerns about the use of your personal data regarding your graduation ceremony including withdrawing your consent, please contact the University Data Protection team using the details below

[datagovernance@uos.ac.uk](mailto:datagovernance@uos.ac.uk)

or

Data Governance Team

Fifth Floor

Waterfront Building

University of Suffolk

Neptune Quay

Ipswich Suffolk

IP4 1QJ