



Policy: **DATA PROTECTION POLICY**

Policy Title	DATA PROTECTION POLICY
Policy Ref:	2024_Data_Protec_Po_V2
Effective Date	June 2024
Responsible Office	Provost Office
Responsible Executive(s)	IT Department

Policy statement

As an academic institution, an employer, and a service provider, the University is dedicated to complying to the General Data Protection Regulation. In order to do this, the University agrees to:

- We process our data in a fair and lawful manner.
- We believe in the rights of individuals.
- We safeguard our personal information.
- We include privacy into our systems and procedures.

Scope

The University is subject to the General Data Protection Regulation and associated data protection legislation. The University covers the University's central academic activities, administrative functions, libraries and business services.

Definitions

The General Data Protection Regulation governs the processing of personal data. The following definitions are used:

- **Personal data** are data which can identify living individuals. As well as images, names and contact details it can also include numerical or statistical information from which an individual's identity can be derived.
- A **Data Subject** is the individual who is the subject of personal data.

Principles

The University is required to process personal data according to the following six principles:

Data Protection Principles	The context for the University
<i>Lawfulness, fairness and transparency</i>	The University explains to its staff, students and customers how it processes personal data at the point of collection and for what purposes
<i>Purpose limitation</i>	The University only uses the personal data it has for the purposes it was collected for
<i>Data Minimization</i>	The University only collects personal data which is relevant to the purposes it is required for
<i>Accuracy</i>	The University ensures that the data is correct, up to date and be able to rectify any mistakes quickly
<i>Storage Limitation</i>	The University does not retain personal data for longer than it is needed
<i>Integrity and Confidentiality</i>	The University protects its personal data against unauthorized access, loss or destruction by a range of security measures

Legal basis for processing – personal data

The University needs to meet the most common following lawful bases in order to process personal data:

Legal basis	Examples for the University
<i>Necessary for the performance of a contract</i>	Covers the majority of processing for our students and
<i>Data subject has given consent to the processing</i>	Covers mailing lists, marketing and other optional services for staff, students and customers
<i>Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</i>	Covers the retention of our student pass lists and transcript information for awards and verification
<i>Necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental</i>	Covers activities around alumni, charitable works and marketing of commercial services

Rights

Data subjects – our students, staff, and Faculty – have a number of rights under the Regulation. These include:

Right	The context for the University
<i>Right of access</i>	Data subjects have the right to find out about what we are doing with their data, check we are holding it correctly, and obtain a copy of what we hold
<i>Right to rectification</i>	The University makes every effort to ensure its data is accurate. If a data subject thinks something we hold about them is wrong, And they can ask anytime for this to be corrected. Then, The University will assess the
<i>Right to erasure / right to be forgotten</i>	Data subjects have the right to ask us to remove or delete the data we hold on them. The University will assess the request against the criteria and respond accordingly.
<i>Right to restriction of processing</i>	Data subjects may, in the course of a dispute with the University about the use of their data, ask the University to stop using their data if certain criteria apply.
<i>Right to data portability</i>	Data subjects have the right to ask the University to provide them with a re-usable electronic copy of their data to allow them to transfer it to another provider. This only covers data submitted to the University by the subject or data observed from the subject's use of a service If technically possible, the University will consider transferring information directly to another provider.
<i>Right to object</i>	Data subjects have the right to object to processing based on legitimate interests, legal obligation or for the purposes of direct marketing or for "scientific or historical research purposes or statistical purposes". The University will assess the request and respond accordingly.
<i>Automated decision making, including profiling</i>	If the University is making decisions about data subjects through purely automated means, such as a computer algorithm, data subjects can appeal against this decision. The University will ensure that subjects can express their point of view and have member of staff provide a review and explanation of the decision.

Data Protection by design

The University is committed to ensuring privacy is built into its processes and outcomes. New projects involving personal data are required to carry out a privacy impact assessment to identify privacy risks and plan appropriate mitigation.

Training and awareness

The University is committed to ensuring its staff has the requisite training and awareness around data protection. All staff must undertake the compulsory 'Data Protection' and 'IT Security training. Further resources and training are provided on the staff intranet and on request from the IT Department.