

Student Data Privacy Statement

Version 1 Approved date: xx by: SOAS SU Trustee Board

SOAS Students' Union ("we", "our" or "us") promises to respect any [personal data](#) you share with us, or that we get from other organisations and keep it safe. We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect with your data. This Data Privacy Statement sets out what you need to know and what you can expect from SOAS Students' Union, in line with your rights under the UK General Data Protection Regulations and Data Protection Act (2018) ("GDPR").

Where we collect information about you from

We collect information in the following ways:

When you give it to us directly

You may give us your information in order to take part in our membership activities, use one of our services, take a survey, purchase products or communicate with us. When you give us this information we take responsibility for looking after it. There are some areas of SOAS SU where we may have additional privacy policies and treat your data in a different way, including if we employ you, and if you use our advice and support services.

Giving your information to student groups and societies means you are giving this information to SOAS SU directly, as these groups are SOAS SU groups and our covered under our policies and procedures.

When we collect it as you use our website

Like most websites, we use cookies to help us make our site – and the way you use it – better. Cookies mean that our website will remember you, and do things like automatically filling your name and address in text fields. You can control and/or delete cookies as you wish – for details, see [aboutcookies.org](#). You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

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 details about what information your device makes available to us.

Through our Data Sharing Agreement with SOAS

Each year, when you enrol as a student at SOAS you automatically become a member of SOAS Students' Union, unless you chose to opt-out of membership. SOAS shares a register of members with us which gives us information about you and the course you're studying. When you share your data with SOAS you are agreeing to share part of that data with us. What data is shared, and the way that we use it is set out in this agreement. When SOAS gives us this data we become responsible for it, and we use it as the core information for your membership.

When you buy a product or ticket from us

To place an order with us online, registration is required. At the point of registration, we request certain information including your name, delivery address and email address. This information is required to enable us to process your order and notify you of its progress. Once an order has been placed, we may contact you by email to confirm your order details and again once your order has been accepted and despatched. Should we need to contact you for any reason regarding your order, we will use the email address registered to your account, or the telephone number where provided. We do not store any sensitive card data on our systems following online transactions. We use payment processor [WorldPay](#) and [MSL](#) to handle these matters. We have data sharing agreements in place with these organisations to ensure your data is handled in accordance with the law.

What personal data we collect and how we use it

The type and quantity of information we collect and how we use it depends on why you are providing it.

Our Members

When you take part in our membership activities and use our services we will use this information to provide the best possible standards of administration and communication.

We may ask for information such as:

- Your name & contact details so that we, and the group you are joining can keep in touch with you
- Your bank details to facilitate payments
- Your date of birth so that we are compliant with age related law, and can uphold appropriate safeguarding
- Information relating to your health if you are taking part in relevant high-risk activities
- Information about any disability so that we can provide reasonable adjustments and support

We will mainly use your data to

- Administer your membership
- Provide you with the services, products or information you asked for
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted
- Enable your activities through any national governing bodies like British Universities & College Sports
- Personalise communications, using information about who you are, what you study, what groups you're involved in to send relevant communications to relevant people.

How we keep your data safe and who has access

Personal data collected and processed by us may be shared with SOAS SU employees and volunteers and under strictly controlled conditions the following groups where necessary:

- Contractors
- Agents
- Advisers
- Service provider partners

When we allow access to your information, we will always have complete control of what they see, what they are allowed to do with it and how long they can see it. **We do not sell or share your personal information for other organisations to use.**

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff and service providers.

Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

We may be required to provide personal data to a Court, law enforcement or emergency services if required to do so by law. This would only be where legally required to do so.

In all other circumstances we will only ever share your data if we have your explicit and informed consent.

Marketing & Communications Preferences

Membership Communications

We believe we have a legitimate interest in communicating with our members about what your elected officers are doing, the services we offer to our members, what we're doing to represent you, democratic decisions affecting our members and opportunities that might be of interest to you.

Controlling what you want to hear about

We make it easy for you to tell us how you want us to communicate, in a way that suits you. If you don't want to hear from us, that's fine. Just let us know when you provide your data, by setting your preferences on our website or contact us on su@soas.ac.uk

Your right to know what data we hold about you, make changes or ask us to stop using your data

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. to provide our service to you) we will do so. Contact us on su@soas.ac.uk if you have any questions.

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.

Subject Access Requests

If you want to access your information, please contact su@soas.ac.uk with a description of the information you want to see and a proof of your identity. If you have any questions please send these to su@soas.ac.uk and for further information see the [Information Commissioner's guidance here \(link is external\)](#).

Your rights to your data

You are protected by UK law and the General Data Protection Regulations. Your rights relating to data are

1. The right to be **informed**
2. The right to **access**
3. The right to **rectification**
4. The right to **erasure**
5. The right to **restrict processing**
6. The right to **data portability**
7. The right to **object**
8. Rights in relation to **automatic data processing and profiling**

You can find out more about your rights on the [ICO website](#)

Exercising your rights

- To ask us to **stop contacting you**: you can sign up to and unsubscribe from specific email communications using our website and links in the emails. You can also make a request via su@soas.ac.uk
- To ask us for a **copy of your data**: email su@soas.ac.uk with the description of the information you want to see. To protect your data privacy and prevent data theft you will be asked to provide proof of identity. We will provide you with your data within 30 days of receiving your proof of ID
- To ask us to **delete your data**: contact us via su@soas.ac.uk with a description of the data you want to have erased. To protect your data privacy and prevent data theft you will be asked to provide proof of identity. We will provide you with your data within 30 days of receiving your proof of ID. We may not be able to delete your data if it is required for the purpose you supplied it, for example if you provided us your name to buy a ticket for an event you still want to attend.
- To ask us to **correct your data** contact us via su@soas.ac.uk with a description of the information that is incorrect, out of date or incomplete.

If you have any other questions about your data and your rights you can contact us via su@soas.ac.uk

Student groups, societies, clubs

SOAS SU are not the data controller for any of the websites, social media pages or communications belonging to any societies, campaigns, sports clubs, student media groups. To exercise your data rights you will need to contact the student group directly. If you have any questions or need any assistance with this contact us via su@soas.ac.uk

To make a **complaint** about how a student group has handled your data contact us with the relevant information via su@soas.ac.uk

Complaints about our handling of your data

Our aim is to work with you on any requests relating to your personal information, however if you are not satisfied with the response you can make a complaint using the [SU complaints procedure](#)

If you do not feel SOAS SU have adequately dealt with your complaint you have the right to complain to the Information Commissioner's Office (ICO). You have a right, at any time, to complaint to the ICO. As an independent UK authority, it upholds information rights in the public interest, promotes openness by public bodies and data privacy for individuals. You can visit their website at <https://ico.org.uk/>

SOAS SU Data Processing Information Table

	Reason for processing your data	"Special Category data" that we process	Categories of personal data that we process	Length of time your data is retained	Article 6 lawful basis for processing your data	Article 9 lawful basis for processing your "Special Category" data	Rights that may be available to you
1	To provide membership services to SOAS SU members	Ethnicity, disability,	Name, gender, nationality, student status, contact address, student ID number, university email address	6 years after <ul style="list-style-type: none"> • graduation • withdrawing from SOAS • leaving membership of SOAS SU 	Legitimate interests	(d) processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects; I actually think the Article 9 condition for this processing is more likely to be (g), Substantial public interest, where processing is necessary to uphold and monitor the equality of opportunity or treatment in an organisation	Right to <ul style="list-style-type: none"> • erasure • object • access • rectify • restrict
2	To facilitate membership activities and groups that you express interest in or join such as sports, societies and campaigns.	Not applicable	Name, gender, nationality, student status, contact address, student ID number, university email address	6 years after <ul style="list-style-type: none"> • graduation • withdrawing from SOAS • leaving membership of SOAS SU 	Legitimate interests (I do not think membership itself creates a contract)	Not applicable	Right to <ul style="list-style-type: none"> • erasure • access • restriction • rectification • object
3	To communicate membership services and opportunities by email that aid the student experience of those studying at SOAS	Not applicable	Name, university email address	1 year after <ul style="list-style-type: none"> • graduation • withdrawing from SOAS • leaving membership of SOAS SU 	Legitimate interests	Not applicable	Right to <ul style="list-style-type: none"> • erasure • object • access • restriction • rectification
4	To communicate information about specific products and services by email (eg about our shop, bar or events)	Not applicable	Name, university email address	1 year after <ul style="list-style-type: none"> • graduation • withdrawing from SOAS • leaving membership of SOAS SU 	Consent	Not applicable	Right to <ul style="list-style-type: none"> • erasure • portability • withdraw consent • access • rectification • restriction

SOAS SU Data Processing Information Table

5	To generate insights to improve our event and services and ensure we provide an inclusive services, products and activities	Ethnicity, disability, sexuality	Name, gender, nationality, student status, contact address, student ID number, university email address	2 years from completing survey	Consent	(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;	Right to <ul style="list-style-type: none"> • erasure • portability • withdraw consent • access • rectification • restriction
6	To support SOAS SU members to resolve issues, complaints and disputes with the University or external organisations.	Ethnicity, disability, sexuality	Name, gender, nationality, student status, contact address, student ID number, university email address	6 years from completion and closure of casework	Legitimate interests	(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject; I suspect this is appropriate for any SC data provided by the data subject in the body of their complaint – if you obtain SC data from other sources (SOAS's Student Casework team does for equality monitoring purposes), you may be able to rely on condition (g) substantial public interest for the purpose of monitoring equality of opportunity or treatment	Right to <ul style="list-style-type: none"> • erasure • object • access • rectification • restriction
7	To provide event ticketing for Union events/activities and sports and societies events/activities to ensure smooth and effective administration of events/activities.	Not applicable	Name, email, student ID number	6 years from transaction	Contract (true where tickets are paid for, but likely to be legitimate interests for free events)	Not applicable	Right to <ul style="list-style-type: none"> • erasure • portability (contract only) • access • rectification • restriction • object (legit interest only)
8	Use of sexuality, disability and ethnicity data to facilitate democratic processes as outlined in the Unions Constitution and Schedules.	Ethnicity, disability, sexuality	Name, gender, nationality, student status, contact address, student ID number, university email address	6 years after <ul style="list-style-type: none"> • graduation • withdrawing from SOAS • leaving membership of SOAS SU 	Consent	(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject; or you could rely on equality of opportunity or treatment under condition (g). Again, it depends whether this data is provided voluntarily and voluntary declaration meets your needs	Right to <ul style="list-style-type: none"> • erasure • portability • withdraw consent • access • restriction • rectification
9	Photographs used for marketing and publicity	Not applicable	Faces and names	8 years from photos being taken	Consent	Not applicable	Right to <ul style="list-style-type: none"> • erasure • portability • withdraw consent • access

SOAS SU Data Processing Information Table

							<ul style="list-style-type: none"> • rectification • restriction
10	Buying something through our website (products, tickets, memberships)	Not applicable	Name, student status, contact address, student ID number, university email address	6 years from transaction	Contract	Not applicable	Right to <ul style="list-style-type: none"> • erasure • portability • access • restriction • rectification
11	Acting as a data processor for student groups, societies, campaigns etc	Ethnicity, disability, sexuality	Name, gender, nationality, student status, contact address, student ID number, university email address	6 years after <ul style="list-style-type: none"> • graduation • withdrawing from SOAS • leaving membership of SOAS SU 	Contract	We act as “data processor” for SOAS SU student groups	Right to <ul style="list-style-type: none"> • erasure • portability
12	Supporting UK Covid-19 Test & Trace scheme	Information about your health, including any medical condition, health and sickness records.	Name, phone number, student ID number	21 days from visiting a SOAS SU space or event	Legal obligation	(Should be (i) processing is necessary for reasons of substantial public interest in the area of public health etc...	Right to <ul style="list-style-type: none"> • access • rectification

Changes to this Privacy Statement We may change this Privacy Statement from time to time. If we make any significant changes to how we treat your personal information we will make this clear on our website or by contacting you directly.