

## **LSO Privacy Policy: current and prospective students.**

This policy mirrors the Anglia Ruskin University Privacy Policy, as the LSO is an associate college of ARU, and LSO students are enrolled students of ARU. <https://aru.ac.uk/privacy-and-cookies/current-prospective-students>

### **What Data with the LSO collect about me?**

We may receive your personal data when you: participate in, access or sign up to any of our services, activities or online content – such as newsletters, competitions, live chats and webinars – phone or email us, vote, pay money to the LSO, reserve a place at an event, apply for one of our programmes or create an account on our website. We will collect some or all of the following:

- your name, and contact information such as address, email address and telephone number, as well as your date of birth, country of domicile and your nationality
- your passport or national identity card details and where relevant your visa or biometric residence permit and immigration history.
- information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study and examination results.
- records relating to assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record;
- details of your engagement with your course and the services we offer.
- our national insurance number (or other tax identification number) and bank details if you want to work for us during your studies
- data about how you use LSO mobile apps, websites or other college-related online content, and the device(s) you use to access these services. This includes collecting unique online identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the web.

Anyone taking part in college activities that they may be photographed, filmed, videoed or otherwise captured in image form. Where possible and practical to do so, we will seek written agreement to image capture. Where this is not possible for practical reasons, unless express objections are received, individuals attending an event at the LSO are deemed to have given their agreement by attending or remaining at the event. Any queries should be raised with the event host in the first instance.

### **Use of Sensitive Personal Data**

This is defined by the General Data Protection Regulation (GDPR) as data relating to racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union

membership, genetic data, biometric data, health data, sex life and sexual orientation and criminal convictions and offences.

We may process special categories of personal data in the following circumstances where:

- we need to carry out our legal obligations or exercise rights in connection with your education.
- it is needed in the public interest
- it is needed in relation to legal claims.
- it is needed to protect your interests (or someone else's interests) and you are not capable of giving your agreement.
- we need to ensure meaningful equal opportunity monitoring and reporting
- we need to undertake data analysis to improve the services we provide, where possible your data will be anonymised.
- you have already made the data public.
- where you have given your explicit written consent.
- Processing will be carried out in accordance with our policy on processing special categories of personal data and the additional safeguards in place for such processing.

### **Updating and correcting your personal data**

- We aim to keep your data current and it is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can do this by emailing [info@lso.ac.uk](mailto:info@lso.ac.uk).
- We may contact you by post or telephone as well as by email, SMS and MMS. If you change your mind about being contacted in the future by any of these means you will be given the option to change your preferences.

### **Where do we get your personal data from?**

- From you when you make an application or enroll as a student, or from open day activities; and
- From third party organisations (this can include UCAS, Student Loans Company, Government Departments such as the Home Office or Department of Education, other institutions involved in the delivery of joint programmes). In using third party sources we will check to ensure they have a legal basis for providing us with your personal data.
- From you when you disclose your personal data, as a student, during the course of your relationship with us when accessing or using any of our services such as financial support, careers advice or counselling services.
- When you use LSO mobile apps, websites or other college-related online content, and the device(s) you use to access these services.
- We may also obtain data from you if you use our QR (Quick Response) codes, attend open day activities, register as a student or apply for one of our courses.

## How do we use your personal data?

The information we obtain from you is used to enter into a contract of education with you or to perform the LSO's obligations under your contract of education, to comply with a legal obligation imposed on the LSO or where it is necessary for the LSO's legitimate interests or those of a third party, provided your interests and fundamental rights do not override them. For example:

- To perform all tasks associated with your admission and delivery of your education including, but not limited to, applications, student support services, residential services, library usage, attendance monitoring, sports facilities, and alumni services;
- To enable us to supply you with the services and information which you have requested;
- To ensure that content is presented in the most effective manner for you and for your computer;
- To analyse the data we collect so that we can administer, support and improve our services;
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have agreed to be contacted for such purposes.
- To notify you about changes to our service.

We set out in the legal basis section of this policy all the purposes for which we may process your personal data, identifying the legal basis and those external parties to whom we may disclose that personal data.

## Who do we share your personal data with?

Authorised personnel within the LSO and its partners will be able to access the personal data you provide to us. We may also disclose your data to other third parties who act for us for the purposes set out in the policy or for purposes approved by you.

Please note that where you nominate a third party or an agent to discuss your application/course with us or to make decisions on your behalf and you provide contact details for that third party/agent, you are agreeing for us to disclose data relating to your application/course to that third party/agent.

Please note that some data that is held about you will be sent to the Higher Education Statistics Agency (HESA). For further information on how this data will be used please [visit the HESA website](#).

All our third-party service providers are required to take appropriate security measures to protect your personal data in line with our policies. We only permit a third-party service to process your personal data for specified purposes and in accordance with our instructions. We do not allow them to use your personal data for their own purposes.

Please note that countries outside the European Economic Area do not always have the same strong data protection laws. However, we will always take steps to ensure that your data is used by third parties in accordance with the terms of this Privacy Policy.

Unless required or permitted to do so by law, we will not otherwise share or distribute any of the personal data you provide to us without your agreement. We respect your personal data and will never sell it to third parties.

## How long do we keep your personal data?

Your personal data will be held confidentially for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We retain personal data collected from applicants, students and alumni in accordance with our Records Retention Schedule. In general terms most student data is retained for 6 years after your last engagement with us but some personal data may be kept for longer so that we can verify your award if you apply for a job, or apply for another course of study.

## What is the legal basis for using your personal data?

The information we obtain from you is used to enter into a contract of education with you or to perform the LSO's obligations under your contract of education, to comply with a legal obligation imposed on the LSO or where it is necessary for the LSO's legitimate interests or those of a third party, provided your interests and fundamental rights do not override them.

The purposes for which we process your data and share it with others is explained in the tables below as well as the relevant legal basis.

### A: Before you enrol

#### Specific Purpose

1. Management of enquiries with prospective students and communication of information about our services, events, and activities
2. To UCAS to administer the applications and clearing process
3. Processing of applications for study and enrolment as a student which can include the processing of criminal convictions data and DBS checks
4. Correspondence with offer holders regarding the next steps in the application and enrolment processes
5. To direct mail and marketing and events

#### Legal Basis

- Necessary for entering into a contract of study with prospective students
- Necessary for the performance of a task in the public interest, namely the provision of higher education
- Necessary for the performance of a task in the public interest, namely the provision of higher education
- Necessary for entering into a contract of study with students
- Processing is necessary for the legitimate

agencies who may assist us in the administration of mailing to enquirers, applicants, offer holders, students and our alumni and the booking of events. Examples of such agencies include SurveyMonkey, MailChimp, EventBrite

purpose of communicating with students and offer holders about benefits, services, activities and events or agree to communicate such information to enquirers and applicants

Necessary for:

6. To the Home Office and other international and national governmental and regulatory bodies in connection with the assessment of immigration status

- compliance with legal obligations or for the performance of public tasks in the immigration context

7. Providing you with an account to allow you to use the Application Tracker app, which supports you in completing the process of applying to study with us

Necessary for:

- Our legitimate interest in supporting applications to study

8. Administering interviews and tests prior to acceptance on some of our courses, and sharing information about the outcome of these with regulatory bodies where they have a role in ensuring the process is managed consistently across the Higher Education Sector

Necessary for:

- the performance of a task in the public interest, namely of assessing the suitability of candidates fairly and consistently with University and/ or regulatory body standards.

9. Contacting you in order to provide support for your additional needs regarding health issues and financial matters, where you have declared this on your application, to support you through the application process and to ensure adjustments and support are available to you when you arrive to study with us.

Necessary for entering into a contract of study with prospective students

Where we process Special Category data for these purposes, we do so with your explicit content

## **B: When you become a student: At or around enrolment**

### **Specific Purpose**

1. Confirming your right to live and study in the UK
2. Production of student identification cards and related student services.
3. Administration of induction events, registration of students on courses and transfers

### **Legal Basis**

Legal obligation to comply with our obligations under immigration law specifically the UK Visa & Immigration (UKVI) Tier 4 Sponsor Guidance.

Necessary for the performance of a task in the public interest, namely the provision of higher education and providing a safe educational environment.

Necessary for the performance of a task in the public interest, namely the provision of

to new courses

4.The provision of college accommodation. This processing may include processing personal data you disclose regarding health condition or disabilities relevant to your accommodation.

5.Disclosure to the Institute of Osteopathy student details for registration of students as members of the iO and provision of college benefits and services

See Section M for further details

6. Disclosure to local authorities for council tax assessment purposes or electoral purposes and for processing of care leaver bursaries

7.Disclosure of all student data of those students enrolled on the Global Online Managed Programmes to ARU's provider, Pearson Limited, and their appointed subcontractors

higher education

Necessary for the performance of our contract with its students or explicit consent to the extent that any sensitive personal data is obtained

Legitimate purpose of providing students with student access to the iO, which is linked with the student insurance policy.

Necessary for performance of task in the public interest, namely local authorities' functions of assessing council tax payments, supporting local authority care leavers, and managing electoral services

Legitimate purpose of engaging third party provider to deliver the Global Online Managed Programmes

## **C: When you become a student: Assessments**

### **Specific Purpose**

1. Evaluation of academic assessments and other course work

2. Granting of academic awards (including the publication of awards, marks, and inclusion in pass lists)

3. Disclosure to other UK based and international educational institutions which we partners or collaborates with to deliver placements, joint or dual awards or franchised or validated awards

4. Disclosure to external examiners for assessment

5. Disclosure to other institutions we:

- jointly conducts research work with or
- contracts to conduct research work on behalf of us

### **Legal Basis**

Necessary for the performance of a task in the public interest, namely the provision of higher education

Necessary for the performance of a task in the public interest, namely the provision of higher education.

Processing necessary for the performance of our contract with students or legitimate purpose of providing students to exchange opportunities.

Necessary for the performance of a task in the public interest, namely the provision of higher education

Necessary for the performance of a task in the public interest, namely the provision of scientific research or for statistical purposes.

to inform the other parties of authorised ARU or LSO representation; supporting the effective conducting of the research and to support the standards reviews of other parties wishing to engage with us.

6. Disclosure to external agencies offering plagiarism checking services such as TurnItIn and other academic institutions to identify instances of collusion in relation to plagiarism misconduct

Necessary for performance of a task in the public interest, namely provision of higher education services (necessary to maintain academic quality standards and integrity)

7. Promoting special academic attainment awards.

Publicising data about award winners through ARU and award sponsors with your consent.

8. Submitting details of participants in grant applications for evaluation by external research funding bodies.

Necessary for the performance of a task in the public interest, namely the provision of higher education.

9. Processing of Disclosure & Barring Service (DBS) checks where you are undertaking 'regulated activity' as part of your studies, for example, to undertake a research project or a work placement involving vulnerable children and/ or adults.

Necessary to fulfil a legal obligation in preventing unsuitable people in regulated activity adversely impacting students, staff and vulnerable groups.

Where we process Special Category data for these purposes, we do so because it is: necessary for reasons of substantial public interest

10. Supporting our partners, under contract, to deliver all or part of our learning services to you

Necessary to perform a public task namely the delivery of learning services Where we process Special Category data for these purposes, we do so because it is necessary for reasons of substantial public interest

## **D:When you become a student: IT and Library**

### **Specific Purpose**

1. Disclosure to offer facilities and services central to your studies such as Library access and computing access
2. Monitoring of use of IT services in accordance with our Acceptable Use Policy.
3. Disclosure to external IT service providers delivering externally hosted IT services or products to us such as Microsoft Office, Unit 4, and Amazon.
4. Disclosure to any third party wishing to access a catalogue within the our library containing reference to student work.

### **Legal Basis**

- Necessary for the performance of a task in the public interest, namely the provision of higher education.
- Legitimate purpose of ensuring network security.
- Legitimate purpose of providing students with modern IT solutions and services to support their studies.
- Legitimate purpose of providing open access to research and academic works where students have agreed to publication of this work or are required to publish

under the terms of any funding or sponsorship agreement.

5. Using your LSO email (and personal email if you have stopped or finished your studies) to contact you regarding outstanding Library fines or matters relating to the return of IT equipment or IT account management.

Legitimate purpose of effectively managing University assets.

## **E: When you become a student: Coming to class**

### **Specific Purpose**

1. Monitoring student attendance at lessons, the submission of assessment and engagement with course material available on software tools.

2. Monitoring attendance and evidence of absence for students studying on a tier 4 visa.

3. Contacting you to let you know about lecture and event cancellations or changes to timetables and related arrangements.

### **Legal Basis**

Legitimate purpose of ensuring that students achieve academic success through full engagement with their studies. As well as analysing student data to help make informed decisions which can lead to improved student satisfaction, retention, and attainment

Legal obligation to comply with our obligations under immigration law specifically the UK Visa & Immigration (UKVI) Tier 4 Sponsor Guidance.

Legitimate purpose of providing access to our learning services.

## **F: When you become a student: Offering support**

### **Specific Purpose**

1. Assessment and provision of support services to students, including the provision of disability support services and study support services.

2. To monitor our compliance with equalities legislation

3. Processing of safeguarding concerns to

### **Legal Basis**

2. Legitimate purpose of providing appropriate support to students based on their needs.

Where we process Special Category data for these purposes, we do so because it is necessary:

- for reasons of substantial public interest

Legal obligation to comply with our obligations under the Equality Act 2010.

Where we process Special Category data for these purposes, we do so because it is necessary for:

- reasons of substantial public interest

Legitimate purpose of ensuring the safety

ensure the safety and wellbeing of our students.

and wellbeing of our students such as acting in the vital interests of an individual, or members of the public.

Where we process Special Category data for these purposes, we do so because it is necessary:

- for reasons of substantial public interest and/ or
- in your vital interests

4. Recording lectures and other sessions in compliance with the Equality Act 2010.

Legitimate purpose of providing facilities to assist disabled students with lecture content to deliver a modern learning experience for our students.

Necessary for:

Where we process Special Category data for these purposes, we do so because it is necessary:

- the performance of a task in the public interest or
- in exceptional circumstances to protect the vital interests of an individual or members of the public.

5. Disclosure to close family or next of kin and emergency services where there is an emergency such as illness or serious injury.

Where we process Special Category data for these purposes, we do so because it is necessary:

- for reasons of substantial public interest or
- to protect vital interests.

6. Disclosure of personal email address (unless you opt-out) to the 'buddy' scheme when you enrol with us in order to provide you with support from a current student at the beginning of your time with us.

Legitimate purpose of providing support to new students.

7. Providing Student Advisor(s) or Personal Development Tutors (PDTs) with information about your circumstances to better support your academic and welfare needs.

Necessary to perform a public task namely to provide welfare support to improve the learning experience Where we process Special Category data for these purposes, we do so because it is necessary for reasons of substantial public interest .

8 Managing your interest in or carrying out voluntary or paid roles for LSO initiatives such

We will process this information for this purpose only with your consent. Where we

as championing special interests and ARU's values and interests.

process Special Category data for these purposes, we do so with your explicit consent.

## **G: When you become a student: Surveys, Stats and Mailing Lists**

### **Specific Purpose**

1. Administration of external and internal student surveys, including collection of feedback on distinct services such as Library services and Careers services.
2. Disclosure to the Higher Education Statistics Agency, the Higher Education Funding Council and Government Departments such as the Department for Education, for the analysis of student statistics and/or to enable them to carry out their statutory functions as applicable. For more information on the information shared with HESA please refer to [HESA's privacy notice](#) (this disclosure may include sensitive personal data about ethnicity, sexual orientation, gender reassignment and religion).
3. Disclosure to direct mail and marketing and events agencies who may assist us in the administration of mailing to enquirers, applicants, offer holders, students and our alumni and the booking of events. Examples of such agencies include SurveyMonkey, MailChimp, EventBrite
4. Improving our services through analysis of data on your past engagement with and your feedback about our services

### **Legal Basis**

Necessary for the performance of a task in the public interest, namely the provision of higher education. Agreement to participate is obtained from students who complete the surveys.

Necessary for the performance of a task in the public interest, (statutory functions or responsibilities of Government Departments and public bodies). Where we process Special Category data for these purposes, we do so because it is necessary:

- for statistical and research purposes.

Processing is necessary for the legitimate purpose of communicating with students and offer holders about benefits, services, activities and events or agree to communicate such information to enquirers and applicants.

Processing is necessary for the legitimate purpose of improving our services Where we process Special Category data for these purposes, we do so because it is necessary in the substantial personal interest.

## **H: When you become a student: Appeals, Complaints and Investigations**

### **Specific Purpose**

1. Administration of academic appeals issued by students and other complaints brought against us.

### **Legal Basis**

Necessary for performance of a task in the public interest, namely higher education provision (necessary to provide an avenue to raise appeals regarding academic assessments and any other grievances). Where we process Special Category data for

2. Administration of complaints, investigations and disciplinary proceedings concerning student misconduct, including investigations into academic misconduct in accordance with our procedure for handling academic misconduct.

3. Disclosure to our insurers in respect of accidents or incidents occurring with the institution and external auditors and external regulators such as the Health and Safety Executive.

4. Disclosure to the police or other regulatory bodies where pursuant to the investigation or disclosure of a potential crime or national security matters such as Benefits or Tax Inspectors, UK Visas & Immigrations and the Foreign and Commonwealth Office.

5. Administration of our CCTV system in accordance with our CCTV Code of Practice

these purposes, we do so because it is necessary for:

- reasons of substantial public interest and/ or
- for managing legal claims

Necessary for performance of task in the public interest, namely higher education provision, (Investigating complaints concerning misconduct is necessary to maintain integrity of ARU/LSO's assessment process, our academic standards, our reputation and the welfare of our students and staff).

Where we process Special Category data for these purposes, we do so because it is necessary for:

- reasons of substantial public interest and/ or
- for managing legal claims

Legitimate purpose of managing our insurance claims or reporting such incidents to regulators and auditors.

Where we process Special Category data for these purposes, we do so because it is necessary for:

- reasons of substantial public interest and/ or
- managing legal claims and/ or
- with your explicit consent

Processing necessary for the performance of a task in the public interest, namely prevention and detection of crime.

Where we process Special Category data for these purposes, we do so because it is necessary for:

- managing legal claims

Disclosures are normally made under the crime and taxation exemptions

Necessary for the performance of a task in the public interest, namely the provision of higher education and providing a safe educational environment facilitate prevention and detection of crime and assist with investigation into potential breaches of University regulations and policies.

Where we process Special Category data for

these purposes, we do so because it is necessary for:

- managing legal claims

Disclosures are normally made under the crime and taxation exemptions

## I: When you become a student: Fees and Finances

### Specific Purpose

1. Processing and recovery of University fees, including course and accommodation fees.
2. Administration of financial awards and prizes such as scholarships, bursaries, and grants, including grants and scholarships provided by third parties
3. Administration of financial aid, such as hardship funding and loans
4. Disclosure to our external agents in relation to the repayment of student debts, where internal recovery attempts have proved unsuccessful.
5. Disclosures to grant funding bodies to evidence allocation of grant funding payments, including payments of salaries and contact details of students undertaking grant funded work (examples of grant funding organisations will include the Medical Research Council, Erasmus, the European Commission, and International Embassies).
6. Disclosure to Student Loans or Grants providers such as the Student Loans Company (SLC), SAAS, SUSI etc to administer student fees and confirm enrolment on course and payments.
7. Disclosure to organisations providing banking and online payment processing services such as Western Union, RBS etc.
8. Administration of job applications and employment contracts where the students are employed by us or through services such as the Employability Service.

### Legal Basis

Necessary for the performance of our contract with students.

Legitimate purpose of administering financial support for students.

Legitimate purpose of administering financial support for students.

Legitimate purpose of recovering student debts.

Legitimate purpose of administering grant funds in accordance with funder requirements.

Necessary for performance of a task in the public interest, namely the proper administration of student funding support

Legitimate purpose of engaging third parties to process and manage our financial transactions

Necessary for the purposes of entering into an employment contract with students.

Where we process Special Category data for these purposes, we do so because it is necessary for:

- the purposes of preventive or occupational medicine and for the assessment of the working capacity of

the employee.

9. Disclosure of engagement and attainment information to a private sponsor where this is a condition of sponsorship.

Legitimate purpose of supporting a contract to study between sponsor and student or necessary for the performance of a contract between the sponsor and ARU.

## J: When you become a student: Health and Safety

### Specific Purpose

1. To provide help or request assistance any time you are on campus, or in LSO owned accommodation.

2. Using absence and sickness details to support your wellbeing.

3. Holding recorded footage of you obtained from CCTV cameras for preventing and detecting crime, internal investigations of breaches of policy, and your health and safety.

4. Public Health matters: using health data shared by you to inform our Emergency Plan activities

### Legal Basis

For the purpose of compliance with a legal obligation.

Where we process Special Category data for these purposes, we do so because it is necessary:

- in your vital interests and/ or
- in the substantial public interest

For the purposes of:

- performing its contract with you and/or
- complying with a legal obligation imposed upon LSO and/or
- a task carried out in the public interest and/or
- protecting your vital interests including but not limited to:

1. Ascertaining your fitness to attend lectures and/or managing sickness absence.
2. Complying with health and safety obligations.

Where we process Special Category data for these purposes, we do so because it is necessary:

- with your explicit consent and/or
- in your vital interests

Necessary for the performance of a task in the public interest, namely the provision of higher education and providing a safe educational environment.

Necessary for the performance of a task in the public interest, namely the provision of a safe educational environment and supporting public health emergency initiatives.

Where we process Special Category data for these purposes, we do so because it is necessary:

with your explicit consent

to protect your vital interests

## **K: When you become a student: Other Support for Learning**

### **Specific Purpose**

1. Disclosure to professional and industrial bodies wishing to communicate with students about career opportunities and membership of or registration with their body and where relevant to confirm your qualifications, accredit your course, provide references/statements of good character and on health with regard to fitness to practice

2. Sharing information with commercial partners to support work placements/ apprenticeships where these are part of your course in order to deliver our learning services, support your wellbeing and safety and to investigate any incidents.

3. Sharing your details with affiliated institutions, research partners and study event organisers to support study placements and events where these are part of your course.

4. Promoting your studies and the LSO's activities through publishing on our Faculty's internet pages your basic personal details, LSO contact details and details of your research.

### **Legal Basis**

Necessary for performance of a contract of study in circumstances where membership of a professional body necessary condition of study and/or for the performance of a task in the public interest namely for a regulated statutory registration scheme (e.g. the General Osteopathic Council for osteopathy students or National Midwifery Council, etc)

Where we process Special Category data for these purposes, we do so because it is necessary:

- with your explicit consent
- to protect vital interests

Necessary for performance of a contract of learning where such placements are a requirement of your course

Where we process Special Category data for these purposes, we do so because it is necessary:

- in your vital interests and/ or
- in the substantial public interest to support your safety and welfare whilst on placement

Necessary for performance of a contract of learning where such placements are a requirement of your course

Where we process Special Category data for these purposes, we do so because it is necessary:

- in your vital interests and/ or
- in the substantial public interest to support your safety and welfare whilst on placement

We will process this information only with your consent.

## L: When you graduate

### Specific Purpose

1. Disclosure to the Higher Education Degree DataCheck service which allows employers or statutory bodies and their agents to verify basic degree and enrolment information about you with your agreement. You should note University degrees are a matter of public record and we can disclose details of your qualification without your consent.

2. Registration as a member of the LSO's alumni upon graduation. Your data as an alumni member will be processed in accordance with our policies and this Privacy Notice.

Contact [info@lso.ac.uk](mailto:info@lso.ac.uk) to opt-out or amend preferences

3. Disclosure of Graduate Outcomes survey results to the Higher Education Statistics Agency. 15 months after you graduate from us.

4. Disclosure to professional and industrial bodies wishing to communicate with students about career opportunities and membership of their body and where relevant to confirm your qualifications and accredit your course

### Legal Basis

Necessary for performance of a task in the public interest, namely provision of higher education services (necessary to maintain academic quality standards and integrity)

Legitimate purpose of maintaining our relationship with graduates.

Necessary for the performance of a task in the public interest namely statistical purposes (HESA's statistical analysis of graduate employment routes)

Necessary for performance of a contract of study in circumstances where membership of professional body necessary condition of study (e.g. the GOsC for osteopathy students)

## M: Student Union (NUS) (if applicable)

### Specific Purpose

1. Disclosure of your name, contact, study, fee status, ethnicity, disability details and carer status to ARU NUS to facilitate your membership and their support activities.

2. Disclosure of details supplied to ARU regarding sexual orientation and gender change only where you have stood or applied to vote in an election where proof of this information is a pre-requisite.

### Legal Basis

Legitimate purpose of providing students with automatic access to our University's Students Union and their services

We will share this information where the NUS has stated that you have given your explicit consent.

## Your rights GDPR

It is important to note that the 'legal basis' we rely on (above) to process your data determines which of your rights are available. You are not expected to know these details, it is our responsibility to understand how the law applies and to explain it to you when responding to a request from you. Our Rights guidance is an opportunity to provide you with information on how you can expect us to handle your requests.

The law provides for the following rights:

- To be informed
- To access your data
- To rectify (change, update or correct) your data
- To erase (remove, delete or destroy) your data
- To restrict our use of your data
- To data portability
- To object
- To not be subject to automated decision-making and profiling

To exercise your rights, please contact [info@lso.ac.uk](mailto:info@lso.ac.uk)

To complain to the Information Commissioner's Office (ICO): the ICO is the UK supervisory authority for data protection issues. For more information please visit the [ICO website](#).

## Information Security

The LSO is committed to holding your data securely and uses information security best practice to transmit personal data. Data is held in accordance with the Corporate Information Security Policy . For example, your personal data is accessible only by those authorised and who have a business need for access. When shared with third parties, your personal data is shared with encryption or in password protected files.

Where we have given you (or where you have chosen) a password that enables you to access our systems, you are responsible for keeping this password confidential. You must not share passwords with anyone.

Although we maintain a number of safeguards, fraudulent email requests are occasionally delivered to staff and students. We will never ask for your username or password by email. Any message that does so should be treated as a potential breach of security, no matter how legitimate it may appear. If you are in any doubt, do nothing until you have spoken to the IT Officer.

ARU have put in place procedures to deal with any suspected data security incident and will notify you and any applicable regulator where we are required to do so. If you have any concerns that personal data has been compromised please contact [info@lso.ac.uk](mailto:info@lso.ac.uk).

## **Processing outside the European Economic Area**

The law requires us to let you know if we or our suppliers process your personal data outside the EEA (The European Union Member States plus Norway, Iceland & Lichtenstein) and what we have in place to make sure your rights in UK Data Protection law remain in place. We do use suppliers such as software providers, IT support providers and online learning module delivery providers as well as ad hoc IT project suppliers who either host our data or access data for support purposes in countries outside the EEA. We will at all times have in place, in our Agreements with these suppliers, features which protect your data rights as required by GDPR. These include: The relevant country has an 'Adequacy decision' in place (meaning UK law recognises its Data Protection laws as equivalent to our own), or the contract contains 'EU Standard Contractual Clauses' which are an approved mechanism to legally require suppliers to comply with UK law. We are monitoring the potential impact of Brexit on these EU arrangements and will take appropriate action if the law requires. At present our data processing outside the EEA meets the demands of UK law.

Last review: September 2020 (no change).