

# University of Hull

## Privacy Notice: Students

Within sections 4 and 5 of this Notice, the main text gives an outline of the processing activity and a symbol to show the legal basis of that processing. For those that wish to have a more detailed understanding of the processing, the paragraphs marked “**More information**” provide further information about how and why the processing is undertaken and a full reference to the legal basis for it.

The University of Hull’s **Data Protection Officer** (“DPO”) has oversight over data protection matters within the University. If you have any questions about this Notice, or any queries or comments on the processing described in this Notice, you can contact the DPO on **dataprotection@hull.ac.uk** or University of Hull, Cottingham Road, Hull HU7 6RX

**Notification of changes to your data:** Please tell us promptly about any changes to the data we hold about you. This is particularly important for your contact details, to do this please email [dataprotection@hull.ac.uk](mailto:dataprotection@hull.ac.uk)

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# 1. Introduction

## (a) Definitions

**University of Hull:** University of Hull "we", "our" and "us" "UoH" "Hull" refers to University of Hull Cottingham Road, Hull HU7 6RX. UoH are the data controller for your personal and special category data.

**Student:** Any individual undertaking study at Uoh, whether under graduate or post graduate.

**Legal bases:** A lawful condition(s) to enable the UoH to process your personal and special category data.

## (b) What is this Notice?

This Notice is relevant to University of Hull students. This includes any person who has accepted an offer to study at Hull, as well as those who are already registered on University of Hull courses. As we hold information in a form that identifies individuals, it is "personal data" often referred to as "data" in this Notice.

We have separate Privacy Notices relating to UoH Alumni information, UoH Staff, and third parties. These can all be accessed through the main Data Protection Page on our website. If you are a UoH student who is also employed by UoH in any capacity, the processing of your data in relation to your employment is covered by the UoH Staff Privacy Notice.

**More information:** The purpose of this Notice is to enable you to understand the scope of the personal data which UoH collect, holds and uses that relates to you personally, and how this data will be handled by us. It covers use of your data within UoH and the circumstances in which we will share your data with other organisations.

We think it is important you know how we use your data. In addition the data protection laws require us to be transparent about how we process your data, and they set legal requirements to give you specific information.

Because of this, and because UoH is a large organisation which needs to collect and use personal data for a range of purposes, this Notice is quite long and it contains some technical legal language. We have tried to make the Notice as clear as possible and provide useful signposting so that you can find the information most relevant to you. See section (c) below for guidance on how to use the Notice. If you have any specific queries in relation to how your data is handled or the content of this Notice, please contact: [dataprotection@hull.ac.uk](mailto:dataprotection@hull.ac.uk)

## (c) What is data protection?

Personal data is information relating to identifiable living individuals (known as "data subjects"). Use of personal data (including collecting data, sharing data or just holding it in files) is referred to as "data processing".

In order to protect your privacy, organisations do not have complete freedom in how they use your data. They have to comply with data protection laws, which apply restrictions on when and how

personal data can be processed. Processing of personal data is lawful only where it meets certain requirements or conditions which relate to the purpose of the processing and how it is carried out.

**More information:** Privacy legislation is set out in the EU General Data Protection Regulation (called “GDPR”) and a new UK law, the Data Protection Act 2018.

Under these laws, University of Hull is the data controller of the information it collects and processes as described in this Notice. This means that it has the legal responsibility to safeguard the information and ensure it is processed lawfully.

In particular UoH will:

- Take steps to ensure that the data it processes is accurate and up to date;
- Give you clear information about its processing of your data, in one or more Privacy Notices like this one;
- Only process your data for specific purposes described to you in a Privacy Notice, and only share your data with third parties as provided for in a Privacy Notice; and
- Keep your data secure.

Information about your data protection rights as a data subject is set out in section 8 of this Notice.

#### **(d) Using this Notice**

Sections 4 and 5 of this Notice identify and explain the data processing and data sharing carried out by UoH.

In these sections, against each description of a data processing or sharing activity you will see a summary description of the processing and a colour-coded indicator of the legal basis of the processing (these are explained below). This first level of information will also include any specific processing activities which we particularly need to highlight to you. You can then choose whether to read the “More Information” text, which gives a more detailed layer of information about the processing and its legal basis.

#### **(e) Legal basis for processing of your data**

In order to process your data the UoH will need a legal basis to do so, these are explained below. in order to process special category data, the UoH require two legal bases to process the data.

UoH is using colour coding to provide a quick, easily-accessible indication of the legal basis for processing. This box explains how the colour coding in this Notice links to the conditions set out in the GDPR: references to Articles are to the relevant provisions within the GDPR.

### More information: Conditions of processing any personal data

	<p><b><u>Necessary for the performance of a contract</u></b> between you and UoH: this will be either the core contract between us for the delivery of your course. The terms of the UoH student contract can be found here: <b>(Insert link)</b> [Art 6.1(b)]</p>
	<p><b><u>Necessary for compliance with a legal obligation</u></b> on UoH: we will identify the relevant obligation [Art 6.1(c)]</p>
	<p><b><u>Necessary for the performance of a task carried out in the public interest:</u></b> this would usually be an activity within UoH's core purpose as a statutory higher education corporation, to deliver higher education and carry out research, but might refer to a public interest task pursued by another organisation [Art 6.1(e)]</p>
	<p><b><u>Consent:</u></b> this means that you have agreed that we can use your data for this specific purpose. You are able to withdraw your consent at any time. When you are asked for consent, you will also be given details of who to contact to withdraw your consent.</p>
	<p><b><u>Necessary for legitimate interests pursued by UoH or another organisation,</u></b> where UoH has determined that the processing represents an appropriate balance between its aims and your interests, rights and freedoms as a data subject. (Where this applies, we will identify the purpose we are pursuing) [Art 6.1(f)]</p>
	<p><b><u>Necessary to protect your vital interests</u></b> or those of another person, i.e. to prevent or manage significant risks of harm [Art 6.1(d)]</p>

### More information: Additional conditions of processing

One of the following must also apply if we are processing special category data about you, data about your **racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or disability or your sex life or sexual orientation.**

	<b>Explicit consent:</b> this means that you have explicitly agreed that we can use your personal data for this specific purpose. You are able to withdraw your consent at any time. When you are asked for consent, you will also be given details of who to contact to withdraw your consent. [Art 9.2(a)]
	<b>Necessary to protect the vital interests</b> of you as the data subject or another person, where you are physically or legally incapable of giving consent [Art 9.2(c)]
	<b>Necessary for the purposes of substantial public interest.</b> [Where this applies, we will identify the relevant public interest] [Art 9.2(g)]
	<b>Necessary for establishment, exercise or defence of legal claims</b> [Art 9.2(f)]
	<b>Necessary for healthcare purposes,</b> including assessment of working capacity, medical diagnosis, provision of treatment or the management of healthcare arrangements. This only applies where the processing is the responsibility of a healthcare professional who is subject to professional obligations of confidentiality [Art 9.2(h)]
	<b>Necessary for purposes of carrying out obligations and exercising rights in relation to employment, social security and social protection law</b> [Art 9.2(b)]
	<b>Necessary for research or statistical purposes,</b> where it is considered that that the use of your data will be proportionate to the aims of the research and that your interests as a data subject will be appropriately safeguarded [Art 9.2(j)]

In addition, we can only process information about any **criminal convictions** you may have where this is in the substantial public interest and falls within a relevant description of processing set out in Schedule 1 of the Data Protection Act 2018. The UoH will process **criminal conviction** data by virtue of Sections 6(1)(e), Section 10 and Section 18 GDPR.

## **2. When and how we collect your data**

### **Data we collect or generate about you**

The data we collect and generate about you includes:

- Collected from you: through your original application to UoH, through online registration/enrolment and subsequently through the work you undertake on your course and all your contacts and engagements with UoH staff and service providers;
- Collected from or via UCAS: the information which you provided in your UCAS application and other information generated through the UCAS admissions cycle
- Collected from other third parties, such as institutions involved in joint programmes with UoH, organisations providing funding or financing for your course at UoH such as the Student Loans Company or any organisations or companies providing you with individual sponsorship or other financial support, agents representing you in the admissions process and organisations which provide work placements and (where relevant) UK Visa & Immigration.
- Generated by UoH academic and Professional Services staff or service providers in the course of delivering and administering your course and your contract with UoH, or providing additional services to you in connection with your status as a UoH student.

### **Data categories**

**The types of data we will hold about you may include:**

- Contact and identification information and personal characteristics
- Your name, and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile, your nationality and details regarding your next of kin. We will also allocate you a unique student number;
- Data about your personal characteristics (gender, ethnicity, disability (this information is also kept for reasonable adjustments and other services to enhance your student experience) sexual orientation, religion) for the purposes of statistical analysis for equal opportunity monitoring and regulatory reporting.

### **Education history and employment information**

- Data 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.
- Data about any employment placements or work you undertake as part of your course at UoH, including your attendance and performance on the placement and any work undertaken as a student ambassador

### **Academic interests, progression and performance**

- Throughout your course we will be creating and retaining records relating to your academic attendance, progression and performance. This will include your submitted assignments and

examination papers, assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record;

- Personal or family circumstances, immigration status and financial information
- Data relating complaints, discipline and fitness to study
- We will keep data you provide to us or received third parties about your family or personal circumstances (including health conditions or disabilities), and both academic and extracurricular interests, for example where this is relevant to any consideration of mitigating circumstances in connection with your academic performance, additional learning support, pastoral care or other wellbeing support, an academic appeal, complaint or disciplinary process or the assessment of your suitability to receive a bursary;
- Where you need a visa to study in the UK, we will need to process information about your immigration status in order to fulfil our responsibilities as a visa sponsor under immigration legislation
- Financial information for the purposes of managing payment of fees

#### • **Special category and criminal convictions data**

The data we collect and generate about you includes information subject to special protections under data protection laws: special category data (your racial or ethnic origin; religion or similar beliefs; sexual orientation; disabilities or health conditions) and information about criminal convictions.

**More information:** The information of this type that we hold includes special category data and information about relevant criminal convictions and offences, including:

- Information concerning your health and medical conditions (e.g. disability and dietary needs);
- Certain criminal convictions and other information provided in DBS checks and the admissions declaration, where this is relevant to admissions decisions or risk management arrangements; and
- Information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation, which is used for equal opportunities monitoring and other statistical purposes.

Our processing of these types of information is identified and explained in sections 4 and 5 of this Notice.

### **3. How we hold your data**

UoH uses an electronic student record system (currently a system called Strategic Information Technology Systems or SITS) to host core student records. There is an individual SITS account for each student in relation to a particular UoH course which they are undertaking. The information held within SITS includes basic contact and registration information; location data; information you provided when applying to UoH; information about your course of study and your academic performance and progress; information about your fee liabilities, financing arrangements, fee payments and other aspects of your contract with UoH; information about complaints, academic

appeals and submission of mitigating circumstances; any student disciplinary matters; and information about any additional support needs you may have. Information in SITS is accessed by UoH staff to the extent that they require access for the purposes of their role within UoH and fulfil our contract with you.

The same types of information which are held within SITS will also be separately held, to some extent, in electronic and/or hard copy by the Faculty or Faculties in which you are studying. Information about complaints and academic appeals may be held centrally as well as in Faculty records.

We use a number of other electronic record-keeping and communications systems for management and delivery of specific UoH services. These include, StarRez, WorkTribe, SEAtS, PowerHouse, JISC Voter Reg, SID and MyCareerHub.

UoH will only to access information in these systems where this is required for the purposes of their role within UoH and to fulfil our contract with you.

Your personal data will also be held in electronic and/or hard copies within files and email folders in individual UoH administration departments. This includes information held by our Finance and Academic Quality departments in relation to their administration of your course and the associated financial arrangements. It will also include any information generated through your decision to access additional services provided by or through UoH, such as accommodation services and additional learning support.

## **4. How and why we process your data for UoH purposes**

This part of the Notice is divided into the following sections which deal with different aspects of data processing within UoH.

- (a) Course Delivery & Education Services**
- (b) Student Support, Wellbeing & Risk Assessment**
- (c) Accommodation, Campus Facilities & Additional Student Services**
- (d) Organisational Development & Reporting**
- (e) Communications**
- (f) Administration, Compliance & Systems**
- (g) After you finish your UoH course**

Within each section, the main text gives an outline of the processing activity and a symbol to show the legal basis of that processing. For those that wish to have a more detailed understanding of the processing, including its legal basis, you can read the text marked “**More Information**”.

### **(a) Course Delivery & Education Services**

#### **(i) Management & delivery of your course**

The data processed for these purposes will include a wide range of information we collect from you and from third parties, and which is generated through your contact with us. This will include contact information, education history and employment information, and details of your course, your progression and your academic performance.   This includes:

- Information about your attendance at classes

- Information about your academic progression and performance
- Your submitted assignments and examination papers
- Appraisals or assessments of and comments on your work, including marks and grades awarded
- Details of examinations taken, your predicted and actual examination grades and other information in your student record; and
- Communications between you and UoH academic or administrative staff, and internal communications between UoH staff which relate to you individually.

We process this information in our Faculties and in our administration teams to ensure that you are able to access all relevant elements of our core teaching, learning and research services in accordance with the UoH Student contract, and the facilities which form part of the core UoH student experience. Our processing will include making arrangements for teaching, assignments, supervision meetings, examinations and other elements of your course content or requirements, and communicating with you about them.  

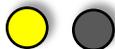
**More information:** This processing is necessary to enable you to develop and progress academically with a view to obtaining the academic standard required to achieve the degree qualification associated with your course.

 Necessary for the performance of the contract between you and UoH

 Necessary for performance of UoH's core public task, i.e. delivery of higher education and research

**(ii) Management of teaching quality and academic standards.**

This includes processing your feedback on your study experience (sometimes using online survey tools such as Online Surveys) and sharing your data with external examiners



**More information:**

Within our teaching, learning and support services we use your data to ensure that we maintain appropriate academic standards. In particular:

- We will ask you to provide feedback on or evaluations of your study experience at UoH, including specific courses or modules you are undertaking. This information will often be provided on an unnamed basis unless you choose to provide your name. All personal data will be anonymised in internal and external reporting of results. We may ask you to provide this information using an online survey tool such as Online Surveys: if this is the case, the survey tool provider will also provide you with a privacy notice about their processing of data. We use your information to provide overall feedback to the UoH staff who manage and deliver a course, with a view to securing appropriate improvements to the course and its delivery. We will sometimes ask to discuss feedback with you for the purposes of

improving the relevant course or course delivery or giving you information on responses to feedback. Your feedback will not affect any other decisions or actions relating to you. We are working on our arrangements for student feedback with a view to reducing the extent to which this involves processing of personal data.

- We process your data through the marking of your assignments and examinations, and in discussions and decisions about the award of marks, grades and degrees. For certain assignments and examinations your submitted work may be shared with external examiners, i.e. academics not employed by UoH who provide an external perspective on the UoH marking process to ensure that it is fair and maintains appropriate academic standards.

 Necessary for the performance of the contract between you and UoH

 Necessary for performance of UoH's core public task, i.e. delivery of higher education and research.

### **(iii) Managing procedures relating to academic appeals, complaints and offences.**

This includes sharing your data with the Office of the Independent Adjudicator for Higher Education (OIA) if you decide to refer any matter to the OIA and with organisations operating anti-plagiarism software on our behalf (e.g. Turnitin®).  

This will include processing of information about any health issues or other personal circumstances which you provide to us for consideration within these processes. 

#### **More information:**

If you issue an academic appeal or make a complaint relating to any aspect of your course, or if there is a concern that you may have committed an academic offence, we will process your data as necessary to apply UoH's policies and procedures in relation to these matters and the UoH student contract . This includes processing information about the work you have undertaken on the course and your academic performance and progression, including information about marks awarded to your work or examination scripts.

If relevant to any allegations about you, we may share your personal data with organisations operating anti-plagiarism software on our behalf.

 Necessary for the performance of the contract between you and UoH

 Necessary for performance of UoH's core public task, i.e. delivery of higher education and research

If, following completion of UoH's processes, you decide that you wish to refer a matter to the Office of the Independent Adjudicator for Higher Education (OIA) for determination of whether UoH has complied with its policies, we are required to provide the OIA with full

copies of the material taken into account under our processes and this will include sharing your personal data.

-  Necessary for legitimate interests pursued by UoH, i.e. compliance with the OIA process

If you provide us with information about your personal circumstances, including health or disability information, on the basis that this is relevant to any appeal, complaint or allegation, then we will process this information as necessary to complete the relevant UoH process and share it with the OIA if you refer the matter to them.

-  Consent: you have agreed to this processing

#### **(iv) Applications for mitigation/special consideration**

We process information about requests from students for consideration of mitigating circumstances which may be affecting their academic performance, in particular their ability to meet deadlines for submission of assignments or other course requirements.  

Where the reasons given for the request relate to health conditions or disability, we will be processing special category data. 

**More information:** We will only process this as necessary for determining your request and implementing any special arrangements which are agreed.

-  Necessary for the performance of the contract between you and UoH

-  Necessary for performance of UoH's core public task, i.e. delivery of higher education and research

-  Consent: you have agreed to this processing

#### **(v) Library services**

The library operates a number of systems which process your personal data, for the purposes of managing the University's learning resources and ensuring you can access resources relevant to your study at UoH. These systems will record information about the learning and research resources which you access and will also be used to send you messages relating to those resources or your study at UoH.

Library enquiries, support requests and management of lost property left in the libraries are processed through the Library (this is an internal process), which can be accessed either through face to face contact with staff on campus or online. The data you give to the Library & Learning Support team will be used only to respond to your enquiry or request. We may access parts of your student record on the library services system or SITS system to enable us to respond effectively to your enquiries and requests and to return lost property to you. From time to time the Library & Learning Support team may need to contact you about services such as the loan, renewal, return, reservation and use of library resources. In order to contact you we will access parts of your student record on the library services system or SITS system.  

**More information:**

The library systems include:

- A library management system, supplied and hosted by an external provider, but utilising UoH's IT security arrangements. This will record information about the resources that you borrow and will send you messages to advise you when resources are due for return and overdue;
- A reading list system, supplied and hosted by an external provider, but utilising UoH's IT security arrangements. This provides guidance on learning resources relevant to your study at UoH. This will record your name and email address should you choose to create a personal profile.
- A variety of online library resources, supplied and hosted by external providers, but utilising UoH's IT security arrangements. Your university login enables you access learning resources relevant to your study at UoH.

Necessary for the performance of the contract between you and UoH Necessary for performance of UoH's core public task, i.e. delivery of higher education and research.  

**(vi) Bursaries, scholarships/studentships and hardship funding**

We will process information about your personal and family circumstances, academic and extra-curricular interests and academic performance and progression where this is relevant to the assessment of your suitability to receive a bursary/studentship or scholarship or your eligibility for hardship funding support. Where a bursary or scholarship is funded wholly or partly by a third party, at their request we will disclose basic information about your identity as the recipient of an award. In relation to hardship funding we may need to process information about your financial position, e.g. bank statements, in order to determine your eligibility for funding.  

Where you provide any information relating to health conditions or disability in support of an application for hardship funding or other financial support, we will process this for the purposes of considering your application and administering payments. 

**More information:**

-  Necessary for legitimate interests pursued by UoH, i.e. enabling access by students to additional financial support.

-  Necessary for the purposes of a contract between us or to take steps preparatory to entering into a contract with you (e.g. a grant agreement to provide hardship funding)
-  Consent: you have agreed to this processing

**(vii) Work placements, student projects & exchange programmes**

Where your course involves undertaking a work placement, a project which is delivered to a third party customer or a student exchange (i.e. where you undertake a period of study at a separate education provider) it will be necessary for your data to be shared between UoH and the other organisation. We are likely to share your name, contact details and information about your course at UoH and your education and employment history in order to arrange the placement, project or exchange. We will ask the third party to share information with us about your attendance and activities within the placement, project or exchange, including performance and progression information. This process will be applicable to overseas students who undertake a placement at the UoH.   

**More information:**

-  Necessary for the performance of the contract between you and UoH
-  Necessary for performance of UoH's core public task, i.e. delivery of higher education and research
-  Necessary for legitimate interests pursued by UoH, i.e. enabling access by students to opportunities relevant to academic study and/or future career opportunities .

**(viii) Professional and regulatory bodies**

Where your course is intended to lead or contribute to meeting the requirements for registration with a professional body, we will share your data with the relevant professional body as necessary in relation to the confirmation of qualifications, professional registration, professional conduct requirements and processes and the accreditation of courses. This may include sharing information about your conduct, performance or progression while undertaking our courses, including any required work placements.

**More information:**

-  Necessary for the performance of the contract between you and UoH
-  Necessary for the performance of a task carried out in the public interest, i.e. professional regulation, maintenance of professional standards and protection of the public
-  Necessary to protect the vital interests of another person

## (a) Student Support, Wellbeing & Risk Assessment

- General

This covers general processing for support wellbeing or risk assessment purposes, in addition to similar processing for specific purposes in the sections below, where these are relevant to your course or where you access specific support services from UoH.

General enquiries and support requests and management of lost property are processed through the CentralHub service, which can be accessed either through face to face contact with staff on campus or on line. The data you give to the CentralHub will be used only to respond to your enquiry or request. We may access parts of your student record on the SITS system to enable us to respond effectively to your enquiries and requests and to return lost property to you.

UoH staff will process information about your personal and family circumstances, academic and extracurricular interests or academic performance and progression where this is necessary to provide you with appropriate pastoral care and support in the context of your studies at UoH, where we have concerns about your ability to continue with your studies at UoH for health reasons or to safeguard you or others from potential harm. 

This will include processing information you have given us about any health conditions or disabilities affecting your life and study at UoH and any other special category data you have provided to us which is relevant. This may also include processing any information given to us by third parties, e.g. expressions of concern about your wellbeing or information about any risks of harm to yourself or others. 

We will process information about any criminal convictions you have and which you notify to us during the admissions process or subsequently. We use this information to carry out risk assessments to identify any significant difficulties which you may experience in completing or using your UoH qualification as a result of the conviction, to identify any potential risks to you or others which would arise from you beginning or continuing to study at UoH and to consider whether or how any such difficulties or risks may be appropriately and effectively managed.

Sometimes a conviction won't affect a UoH qualification but it will affect a professional accreditation or a membership 

**More information:**

-  Necessary for the performance of the contract between you and UoH
-  Necessary for performance of UoH's core public task, i.e. delivery of higher education and research
-  Necessary for the purposes of substantial public interest (Safeguarding students under 18 and vulnerable students over 18)
-  Consent: you have agreed to this processing
-  Necessary to protect your vital interests or those of another person

**(i) Additional Learning Support**

If you have an additional learning support need, you can access a range of support services through UoH's Learning Support Team (LST) team. With your agreement we will process your personal data, including information about relevant health conditions or disabilities, for the purposes of providing this service. At least some information about your support needs will need to be shared with UoH staff involved in managing and delivering your course, to enable appropriate support to be provided. There is some data sharing between LST and our Accommodation Services team to enable allocation of appropriate accommodation and/or support to students with disabilities and health conditions. Further information about this processing is provided if you register to use Accommodation Services and/or LST. 

**More information:** We use the information you provide to assess your needs, determine the support which can be provided to you, determine eligibility for public funding for the cost of that support, provide the support to you and process any payment required for the support. We do this only with your agreement and on the basis that it is necessary to enable us to provide the ALS service. Where we have identified needs for additional support and arrangements for this support have been put in place, this will usually be recorded in SITS (your student record) to ensure that your needs are understood and met throughout your period of study at UoH.

-  Consent: you have agreed to this processing

**(ii) Occupational Health**

Where your course requires you to undertake work placements within healthcare settings, it is necessary for you to undergo an occupational health assessment to identify any risks or issues which may affect your ability to complete the placement and any needs you have for specific support in your placement, e.g. due to health conditions or disability. This applies to professional healthcare programmes of study w Your personal data will be shared with the University's occupational health department. This will take place once you have accepted an offer to study at UoH. Outcomes from this assessment process may be shared with UoH if they are relevant to your suitability to take up your offer of study at UoH. Further information will be given to you when we make the referral to the service.   

**More information:** Within the occupational health services provider, data relating to your health conditions or disabilities is processed only by healthcare professionals who are subject to professional obligations of confidentiality.

-  Necessary for performance of UoH's core public task, i.e. delivery of higher education and research
-  Necessary for healthcare purposes, including assessment of working capacity, medical diagnosis, provision of treatment or the management of healthcare arrangements.
-  Necessary to protect your vital interests or those of another person, i.e. to prevent or manage significant risks of harm
-  Necessary for the purposes of substantial public interest: safeguarding vulnerable people

**(iii) Mental Health and Wellbeing Support:**

This is a student focused service that provides guidance and interventions around wellbeing and mental health. When accessing this service you may receive support directly from the team or you may be referred to a partner service such as the Student Assistance Programme or Lets Talk. There are a number of partner services which have been carefully chosen to respond to specific wellbeing and mental health related issues. Mental Health and Wellbeing Team staff will process your data in order to assess the necessary steps to support you and/or to refer you to a partner service, referrals will not be made without your consent. Partner services will inform you on how they process your data. Within the Mental Health and Wellbeing team your information will only be processed by trained professionals who are subject to confidentiality.

**(iv) Criminal convictions information and Disclosure & Barring Service**

If you are following a course which leads to entry to a regulated profession which is exempt from the Rehabilitation of Offenders Act 1974, either UoH (for direct applications) or UCAS will have asked you to declare at the application stage whether you have any spent or unspent criminal convictions that would not be filtered from an Enhanced DBS check. This information will have been used to carry out appropriate risk assessments and consider whether you will be able to meet the requirements of the course and any associated professional registration requirements. Before commencing study on these courses you will also have to undergo an Enhanced DBS check conducted by the Disclosure & Barring Service. This will identify convictions and cautions on your record. The results of these checks will be shared with UoH.

Students on any course undertaking work placements that will bring them into unsupervised contact with children or vulnerable adults will need to undertake a DBS check before they can commence their placement. 

-  Consent: you have agreed to this processing

## **(v) Immigration support**

UoH's student services team provide support and assistance to future students (those who have received an offer from UoH) and registered students with regard to their immigration status and visa applications. This is provided through webinars, workshops and one to one appointments. This service is regulated by the Office of the Immigration Services Commissioner (OISC), which may access information for the purposes of auditing compliance with their standards and requirements. We retain records of advice given to individuals for six years, in accordance with OISC requirements.

## **(c)Accommodation, Campus Facilities and Additional Student Services**

### **(i) Accommodation**

Your data will be processed by our Accommodation Services team where you choose to apply for student accommodation or use other accommodation services provided by UoH. UoH facilitates booking of places in student residences (provided by either UoH or by third party providers under contract with UoH) through the UoH Accommodation Portal.

Further privacy information will also be given to you when you register to use the Portal.

Your name, contact details and banking details will be processed for the purposes of managing your booking and then managing your contract for accommodation. This will include your data being shared with any third party accommodation provider which operates the accommodation you are booking.

-  Necessary for the performance of the contract between you and the accommodation provider, or for preparatory steps in relation to that contract.

In order to determine whether it is appropriate for you to book UoH accommodation, we will process information about relevant criminal convictions you have declared to us. This will be subject to risk assessment to identify any safeguarding considerations.

-  Necessary for the purposes of substantial public interest: safeguarding vulnerable people

If you provide us with information about any health conditions, disabilities or support needs relevant to your booking of accommodation, we will process this within UoH and share it with accommodation providers as necessary to identify your accommodation needs and help you secure a booking of appropriate accommodation.

-  Consent: you have agreed to this processing.

While you are living in UoH accommodation, if there are concerns about your conduct, welfare, or welfare of others then UoH and your accommodation provider may share information between them, with UoH/other departments in UoH or with third parties (e.g. NHS organisations or the police) if this is necessary to safeguard your welfare or the welfare of others

 Necessary to protect your vital interests

## **(ii) Campus Facilities**

We process your information in a number of ways in order to manage the UoH estate (land and buildings) This includes:

- Operation of CCTV systems. Data generated through the operation of these systems will in certain circumstances be shared with the police.

CCTV systems are in place in some parts of UoH's estate for the purposes of ensuring a safe and secure environment, preventing crime and anti-social behaviour and facilitating the detection or prosecution of criminal behaviour. CCTV footage is processed in accordance with UoH's CCTV policies and procedures. Images are captured 24 hours a day, seven days a week. These images are automatically erased after a period of no more than 31 days after they are recorded, unless before that time we are made aware that the images are required for evidence (in which case they are securely stored until the incident is resolved or the information is passed to an official third party). Access to the footage is securely controlled by UoH's IT security arrangements. We may provide CCTV footage to the police where they believe that a crime has been or may have been committed and we are satisfied that the CCTV footage may assist them in their investigation and disclosure would comply with the data protection legislation.

- Management of car parks and provision of parking permits. This includes sharing data with the third party provider of parking enforcement services. Your data is processed within UoH when we process any application you make for a UoH parking permits. A third party provider carries out monitoring and enforcement of the terms and conditions of use of UoH car parks.
- We use your contact details to let you know of any issues affecting access to or safety on the campus

 Necessary for the performance of a task carried out in the public interest, i.e. operation of UoH as a university in a safe, secure and efficient environment

 Necessary for the performance of a contract between you and UoH

 Necessary for legitimate interests pursued by UoH, i.e. management of premises

## **(d) Organisational Development & Reporting**

### **(i) Internal analysis and reporting**

We use information about you, your academic performance and progression and your feedback on your UoH student experience to carry out analysis which is used to improve

UoH's provision of higher education and carry out equal opportunities monitoring to inform our work to widen participation in higher education at UoH. This includes processing of data we receive in your application to UoH about your ethnicity and your socio-economic background (including whether you are a care-leaver). It will also include any information you have given us about your health conditions or disabilities, or your gender status, sexual orientation and religion or equivalent beliefs. This information is used only for analysis and reporting purposes: it is not used to take any decisions or actions in relation to you as an individual.

**More information:**

We carry out a wide range of analysis and internal reporting to inform internal UoH discussions and decisions aimed at:

- Improving the quality and effectiveness of our higher education provision and increasing our ability to meet the expectations and needs of students/potential students and future employers; and
- Widening access to/participation in our higher education provision by all groups within society. Monitoring equality of opportunity and progress in widening participation is required by the higher education regulator, the Office for Students, and by the Equality Act 2010.

For these purposes we use data about your academic performance and progression which is generated through your study at UoH and contained in your student record. We also use data about your personal characteristics which you provide when applying for admission to UoH or when you register as a student with us. The data about your personal characteristics is used only to create this statistical analysis. The personal characteristics data and the statistical analysis are not used to take any decisions or actions in relation to you as an individual.

Reports on this statistical analysis are shared internally in a range of ways. This includes reporting within our governance structure, to our Board, Senate, Committees and sub-Committees. It also includes use within our Academic Quality team and Faculties to drive improvements within UoH.

-  Necessary for performance of UoH's core public task, i.e. delivery of higher education and research
-  Necessary for the purposes of substantial public interest: this is equal opportunities monitoring
-  Necessary for research or statistical purposes

**(ii) UoH surveys**

Some survey tools that collect information prior to placement abroad and their participation is mandatory. We sometimes ask for your feedback on matters relating to your student

experience at UoH, These may be sent to you while you are still at UoH or after you leave UoH. You are not required to participate in these surveys. The results will be processed for analysis and statistical purposes, including equal opportunities monitoring, widening participation and improving UoH's administration, course delivery and services.

The UoH will ask you to complete surveys that may be mandatory, an example of where this will happen is where we wish to collect data prior to a placement abroad

-  Necessary for performance of UoH's core public task, i.e. delivery of higher education and research
-  Necessary for legitimate interests pursued by UoH, as described above.

### **(iii) External analysis and reporting generally**

We will also use your data to produce analysis and reports as requested or required by external bodies and for other external reporting purposes. The analysis and associated reports or commentary which we produce will not include your data at an individual level or in an identifiable format. The data processed for these purposes includes data we receive in your application to UoH about your ethnicity and your socio-economic background (including whether you are a care-leaver). It will also include any information you have given us about your health conditions or disabilities, or your gender status, sexual orientation and religion or equivalent beliefs. This information is used only for analysis purposes: it is not used to take any decisions or actions in relation to you as an individual.

**More information:** UoH is required to make a range of reports to the Office for Students (the higher education regulator). These include reporting on UoH's actions for the purposes of widening participation as well as to enable analysis of the quality and effectiveness of UoH's teaching and research activities. UoH may also be asked to provide similar reports to the UK Government (Department for Education) and other public or government bodies or agencies. Personal data is processed by UoH to produce this reporting information, but the reports do not include personal data i.e. data at an individual, identifiable level.

-  Necessary for performance of UoH's core public task, i.e. delivery of higher education and research.

### **(iv) Providing information to HESA and national surveys**

As a higher education provider UoH is legally required to include your personal data in an annual data report to HESA, the Higher Education Statistics Agency. Our reporting to HESA includes your name, the course you are following at UoH and your funding arrangements, as well as detailed information about your personal characteristics including home postcode, ethnicity and any information we hold about your health conditions or disabilities, sexual orientation, religion or equivalent beliefs and care leaver status.

For further information about the data provided to HESA and the way in which it is processed by HESA and other third parties, please see the HESA Collection (privacy) notice for students: <https://www.hesa.ac.uk/about/regulation/data-protection/notices>.

We provide some of this information under the legal framework in the Higher Education and Research Act 2017 or for a task in the public interest, or for legitimate interests, and always for research and statistical purposes. We do not ask for your consent to provide this information to HESA. This processing is not on the basis of consent, once you have given us the information. If you have questions or concerns about HESA's use of your information which are not answered by the HESA privacy notice, you should contact HESA directly using the contact details provided in its privacy notice. 

-  Necessary for compliance with a legal obligation
-  Necessary for the performance of a task carried out in the public interest
-  Necessary for legitimate interests
-  Necessary for research or statistical purposes,

In addition to the annual data report to HESA, we also provide your name, course details and contact information to:

- The organisation which acts on behalf of the Office for Students to carry out the National Student Survey.

This is an annual survey of higher education students' views about their course and higher education provider which is used to create published feedback about and ratings of courses and providers, and generally to drive improvements in higher education provision;

and

- the organisation which acts on behalf of HESA to carry out the survey currently called the Graduate Outcomes Survey.

This is a survey about the job/career outcomes for higher education graduates. After you leave UoH you may be contacted and asked questions as part of this survey.

If you are contacted for these purposes you will be given further privacy information at that point.

With your agreement you may also participate in other external surveys relating to our higher education provision, such as the Postgraduate Taught Experience Survey. or the Postgraduate Research Experience Survey, both of which are operated by Advance HE. 

Participation is voluntary: you will be asked for your consent to the use of your personal data for these purposes, on the basis of information provided about the scope of the personal data you are providing and how it will be used.

 Consent: you have agreed to this processing

## (e)Communications & Surveys

### (i) Communications

We process your contact data to facilitate and manage your registration as a student at UoH, and to administer your course of study. We create an individual student ID number and a UoH email address for each student. Your name, ID number and UoH email address are listed in our internal contacts directory which is accessible to all UoH staff and students using UoH's email system.

UoH academic and faculty staff will use your contact information to communicate with you about your academic work and associated administrative arrangements such as arrangements for examinations and submission of assignments. UoH Professional Services staff will use your UoH email address to communicate with you about non-academic matters including wellbeing support and disciplinary action.

We use your UoH email address to send you frequent communications about matters relevant to your course or accommodation (if you are resident in UoH-allocated accommodation) and about other aspects of the UoH student experience (such as matters affecting the UoH environment on campus and information about UoH facilities and events). If you have provided us with an alternative email address, we may use this as well as your UoH email address. We will not use your email address to send you direct marketing communications unless you specifically consent to receive marketing emails of a particular type. 

**More information:** This processing ensures that you are able to access all elements of your course in accordance with our commitments under the UoH Student Agreement. This includes feedback from UoH staff and facilities required for your course. It also helps to ensure your safe and appropriate use of UoH facilities, and to facilitate your access to the wider student experience at UoH which forms part of the core UoH offer to its students. It enables you to make informed choices about accessing specific services or experiences available through your position as a UoH student.

 Necessary for the performance of the contract between you and UoH

 Necessary for performance of UoH's core public task, i.e. delivery of higher education and research in an appropriate environment

- Necessary for legitimate interests pursued by UoH, i.e. enabling access by students to all services and facilities available to them as a higher education student and ensuring a safe environment

**(j) Administration, Compliance & Systems**

**(i) Finance**

We process your data in order to make appropriate payments to you and receive funds on your behalf, including:

**1. Course Fees, bench fees and field trip fees**

Our Finance team will process your data in order to identify the fees which you need to pay under your contract with the University and obtain payment of those Fees. This will include processing of information about your nationality, country of residence and immigration status, where this is relevant to determining the level of course fees that you need to pay and your funding source (if any). If you obtain funding from the Student Loans Company, we will share some of your data with them. ● ●

Where your fees are paid in full or in part by a sponsor the UoH will liaise with the sponsor in relation to your academic process. ●

- Consent: you have agreed to this processing

We then process information about your course/progression, your fees status and your source of funding and method of payment in order to issue invoices for, and receive and process payment of, your fees.

If you apply for funding from the Student Loans Company, we share information about your course, progression and attendance/registration, your fees status and your payment status with the Student Loans Company as necessary to enable them to enter into and monitor the agreement they have with you and make arrangement for the payment of your course fees.

- Necessary for the performance of the contract between us

- Necessary for legitimate interests pursued by the Student Loans Company, i.e. applying their funding eligibility criteria and the terms of their loan agreement

**2. Expenses & other payments**

If you are able to reclaim any expenses incurred, e.g. in the course of a UoH research project, we will process information about the relevant activities and your banking details in order to determine whether UoH can pay the expenses and to make payment as appropriate. ●

- Consent: you have agreed to this processing

### 3. Scholarships, bursaries and hardship funding

We process your data as necessary to make payment of any scholarships, bursaries or hardship funding you are awarded. This will include name, contact details, course and award details and payment information (e.g. banking details).  

### 4. Debt collection

If you fail to meet your financial obligations to UoH, we will process your data for the purposes of debt collection. If you do not respond adequately to our request to remedy any debt situation when given appropriate opportunity to do so, we may share your data with a third party who is contracted to provide debt collection services to UoH. For these purposes we will process and share information about you, your fee status and fee liabilities, your payment or non-payment of fees, and your contact details.  

 Necessary for the performance of the contract between you and UoH

 Necessary for legitimate interests pursued by UoH: collection of debts owed to UoH

To comply with legal and audit requirements we keep personal data relating to these Finance matters for a minimum period of seven years after the end of the tax year in which the relevant payment is made.

#### (ii) **Complaints & discipline**

If you are subject to the student disciplinary process or if you make a complaint under the student complaints process, we will process your data as required to apply the relevant processes. This will include sharing your data with any individuals who are the subject of any complaints, with those required to take decisions about your complaints or any disciplinary allegation against you and (possibly) with the Office of the Independent Adjudicator for Higher Education (OIA) if you decide to refer any matter to the OIA.   

If you have provided special category data (e.g. information about health conditions, disabilities or additional needs) in relation to the complaints or disciplinary process, this will be processed on the basis that you have consented to its processing in relation to all aspects of these processes.

#### **More information:**

 Necessary for the performance of the contract between you and UoH

 Necessary for performance of UoH's core public task, i.e. delivery of higher education and research

 Necessary for legitimate interests pursued by UoH, i.e. compliance with the OIA process

### **(iii) Immigration Compliance**

If you require a student visa in order to study in the UK, we will need to process your data for purposes relating to immigration and visa applications.

When you accepted an offer from UoH we will have processed your information to issue the Confirmation of Acceptance of Studies (CAS) that you need in order to apply for a visa and to comply with our legal obligations under our Tier 4 visa sponsor licence. This may have included sharing your data with UK Visas and Immigration (part of the Home Office within the UK Government).

We will carry out similar processing in respect of any application you make to extend your visa. As for the initial processing to issue a CAS, we may need to share information with UK Visas and Immigration in order to obtain information relevant to your eligibility to extend your visa. For a visa extension we also have to process financial information including bank statements. If your reasons for seeking an extension include an illness you have suffered, we may also have to process information about your health for these purposes.

We are required to retain some information collected for the purposes of our position as a Tier 4 Sponsor under the immigration legislation for the duration of your studies, and some information must be retained for six years after completion of your studies. We are also required to share retained information with UK Visas and Immigration on request for audit purposes. This is in accordance with the document retention guidance for Tier 4 Sponsors which is issued by UK Visa and Immigration  

 Necessary for compliance with a legal obligation on UoH: our obligations as a Tier 4 sponsor/licence holder under the immigration legislation

 Consent: you have agreed to this processing

### **(iv) Audit**

Your data which is held within our Finance or other administration teams may be viewed by UoH staff carrying out internal audits or staff of external companies or organisations carrying out external audits of our operations. They will process this data only for the purposes of auditing our compliance with UoH processes and legal or regulatory requirements. They will not use your data to contact you or take any decisions relating to you as an individual. 

 Necessary for performance of UoH's core public task, i.e. delivery of higher education and research

### **(v) IT services and systems**

We process your data in the course of providing and maintaining the IT systems which we use to hold, access and create the personal data relating to you which is covered by this Notice. Some of this processing will be carried out by third parties who provide those systems to us or provide technical support services to us. These include Tribal which provides the SITS system used for student records. Your data will be processed in the course of the following activities:

**(vi) Holding data and hosting systems**

Much of the personal data described in the rest of this privacy notice will be held in electronic form in systems provided or hosted by UoH, including systems we have procured from third party providers. Separate privacy information will be given to you about some of these systems. Some of your information may be held in cloudbased systems. We enter into agreements with IT service providers so that we have appropriate assurances in place regarding the functionality and security of their systems, to ensure that your data is processed in compliance with the data protection laws which apply in the UK.

**(vii) System development and maintenance**

Where your personal data is held within UoH IT systems it may be viewed or otherwise processed in the course of work to maintain, test or further develop the functionality or security of our systems. This processing may be done by UoH staff or by third party suppliers of the relevant system or service providers. Access to these systems is limited to specific authorised professional UoH IT or third party staff as necessary for the purposes of their current responsibilities within their role at or for UoH. This processing does not result in any communications with you or any decisions being taken which relate to you individually. UoH is seeking to minimise the use of identifiable data for these purposes, and ensure that third parties carrying out this processing are subject to appropriate contractual requirements to maintain the confidentiality and security of your data.

**IT support services**

UoH provides an IT support service to students. Your data will be processed by UoH staff for the purposes of responding to any requests for support that you make to this service. This may include accessing your personal UoH accounts (e.g. email),

-  Necessary for the performance of the contract between you and UoH
-  Necessary for performance of UoH's core public task, i.e. delivery of higher education and research
-  Necessary for legitimate interests pursued by UoH, i.e. operating and improving IT systems appropriate to the work of the organisation

## **(g) After you finish your studies at UoH**

### **(i) Graduation**

With your agreement, we will publish your personal data (your name and course) in information relating to graduation award ceremonies for your course. ●

We film the graduation ceremony and broadcast the footage on-line both live and after the ceremony. We also take photographs and footage throughout the day of graduation ceremonies and post this on social media. ●

#### **More information:**

We publish your name and course details in the graduation ceremony booklet which is available to everyone attending a UoH graduation ceremony.

When you register online to attend the award ceremony or choose to graduate in absentia you will be asked whether you consent to your data being published in this way. If you do not consent, this will not affect your ability to attend or participate in the graduation ceremony.

● Consent: you have agreed to this processing

Film footage of all of our graduation award ceremonies are broadcast online and will be available to view online afterwards. The film will be live-streamed through the UoH website, and will later be available to view on You-Tube. If you have any concerns about this, please contact **dataprotection@hull.ac.uk** to discuss: however please note that we are unlikely to be able to guarantee your privacy, particularly with regard to the live stream UoH also takes photographs and films throughout the day of the Graduation ceremony, and includes some of these films and photographs in frequent social media posts.

However, due to the size and nature of the graduation event we are unlikely to be able to guarantee that we will not include particular individuals in photographs, film or social media on the day. Again, please contact us **dataprotection@hull.ac.uk** if you have any queries or concerns about this. We will take into account any concerns or objections you have in relation to future use of photographs in our marketing or publicity materials.

In general, you need to be aware that a very large number of people attend our graduation ceremonies, and UoH has no control over the actions of attendees with regard to the taking, sharing or other use of either still or moving images. ●

Necessary for legitimate interests pursued by UoH: celebrating student achievement and providing participants with records of the day, promoting UoH. ●

### **(ii) After Graduation**

We will retain your data as collected or generated for the reasons given above, in accordance with our retention policies.

We may continue to process your data within our Careers service, if you take up your ability to use this service for up to three years after Graduation. 

 Consent: you have agreed to this processing

Except where exceptional circumstances apply, postgraduate research students are required to deposit a copy of their thesis with the UoH Library Service. This is then available to registered users of the library and details of the thesis are set out in the online library catalogue.

Your name, contact details and information about the course you followed at UoH and the degree you obtained will be transferred into our Alumni database. Please see the separate Alumni and Fundraising Privacy Notice

#### • **Additional future reasons for processing**

In addition to the original basis for processing your data as set out above, there may be situations where the basis for our processing changes over time due to developments in circumstances or in our relationship with you. We may then rely on a legal basis for processing which is not mentioned above.

We may originally process your data on one basis, but then find that it is necessary to retain it and carry out further processing for other reasons even where the original basis no longer applies. For example, we may originally have collected and processed your data on the basis of consent or legitimate interests, but subsequently identify a need to process it for the purposes of managing a legal claim or process, or to protect the vital interests of you or another person. If at any point you have concerns or questions about the basis on which we are processing your data, please contact our Data Protection Officer.

## **5. Sharing your data with third parties**

This section describes when and why we share your data with third party organisations where this is not covered in section 4.

### **(i) Students Union (HUU)**

All UoH students are eligible for membership of the Hull University Students Union (HUU). If you decide to during online registration at the start of the academic year to become or remain a member of HUU, we will pass some of your basic contact and course information to HUU to facilitate the administration of HUU   

**More information:** All UoH students are eligible for membership of the Hull University Students Union (HUU). HUU is a separate organisation from UoH and has its own legal

status. However UoH has a legal obligation to support the fair and democratic operation of HUU.

When you complete your registration as a UoH student, you will automatically become a member of HUU and we will share your registration details with HUU. This is to enable HUU to establish and administer your membership, carry out other core HUU activities (including administration of voting rights and elections) and send you communications relevant to you. After we share your data, HUU will be responsible for compliance with data protection law in relation to its processing of that data. HUU will contact you direct regarding your membership and to provide you with access to HUU systems and services. HUU will provide you with separate privacy information about how it will process your data for its purposes.

-  Necessary for compliance with a legal obligation on UoH: its obligations under the Education Act 1994 as to governance of HUU
-  Necessary for the performance of a task carried out in the public interest: the functions of UoH and HUU under the Education Act 1994, including HUU's function of representing students
-  Necessary for legitimate interests pursued by UoH and HUU: efficient and effective management of membership by HUU, facilitating the fulfilment of students' rights to student union membership, representing the interests of students.

## (ii) **Non-routine data sharing in exceptional circumstances**

We will share personal data with emergency services and/or the person you have identified to us as being your next of kin or emergency contact, where this is necessary to safeguard your position or that of other individuals. 

We will also share personal data with the police or other organisations with responsibility for investigating potential crimes such as fraud (e.g. local authority fraud investigation teams) where satisfied that this is necessary for the prevention or detection of crime. 

This may include sharing special category data such as health information. 

We will also share your information (including name and address) with a local authority where this is requested under their statutory powers for the purposes of environmental protection (e.g. noise abatement issues) and council tax reduction claims. 

-  Necessary for compliance with a legal obligation on UoH:

**More information:** Depending on the nature of the situation which has arisen, sharing with the emergency services could include sharing information with the police, National Health Service organisations and the Fire Service.

Disclosure is necessary to protect your vital interests, i.e. where you are at clear risk of harm, or to protect the vital interests of others e.g. if they are at risk of harm from your actions. We will only share special category data on this basis if it is not possible for us to obtain a valid consent from you to the disclosure.

Where the police have told us, and we are satisfied that this is the case, that sharing your data with them is necessary for the purposes of preventing or detecting crime, or where we have suspicions regarding the commission of the offences that we consider it appropriate to pass to the police for investigation.

Disclosure is necessary for the purposes of protecting you or others from risk of harm, or for prevention/detection of crime: these are purposes in the substantial public interest.

## **6. Transfer of your data outside the European Economic Area (EEA)**

Data protection laws limit our ability to transfer personal data outside the countries within the EEA (i.e. the countries which are subject to the same or very similar data protection laws). This is to help ensure that a consistent level of data protection applies to your data at all stages of processing, and that you are not exposed to additional privacy risks through the transfer of your data. Transfers of data outside the EEA are only permitted in certain circumstances.

We have given information in sections 4 and 5 about specific situations in which your personal data is or may be transferred outside the EEA. Aside from these situations there may be a transfer of your personal data outside the EEA in the following circumstances:

- Where we use a cloud-based IT system to hold your data, and the data in the cloud is stored on servers located outside the EEA. In these circumstances we safeguard your data through undertaking appropriate checks on the levels of security offered by the cloud provider and entering into a contract with them which applies protections of the same type and level required by data protection laws within the EEA;
- Where you are based outside the EEA and we need to send you emails or other communications which are necessary for the performance of our contract with you or for implementing pre-contractual measures which you have asked us to take (e.g. processing an application or enquiry, making arrangements for you to commence your studies at UoH or processing your data to facilitate distance learning). In these circumstances the data protection laws say that transfer is permitted.

• Necessary for the performance of the contract between you and UoH

## **7. Retention: how long will we keep your data for?**

Where relevant we have given information about the length of time for which we will keep your personal data in connection with some categories of processing/data. UoH is undertaking a review of its retention policies and future versions of this Notice will contain more specific references to retention periods for different categories of data.

In general, we apply the following principles to determine for how long we will keep your data:

- Much of the personal data we hold, including within your student files and in our Finance department, will be kept during the period of your UoH course and for several years after you leave UoH. We keep this data to enable us:

- o to manage your course/education efficiently and effectively and provide you with appropriate support during your time at UoH

- o to respond to queries or concerns you have about your experience at UoH either during your time here or afterwards, and to defend any legal claims brought against us; and

- o to comply with legal and regulatory requirements as to accounting and audit.

- A small amount of data will be held indefinitely: this is the data that we need to hold so that we can confirm whether individuals attended UoH and the qualifications they obtained here.

## **8. Your rights as a data subject and how to exercise them**

Under the data protection laws you have a number of rights in relation to our processing of your data. In summary these are:

- Right to request access to your data as processed by UoH and information about that processing [“Right to access”]
- Right to rectify any inaccuracies in your data
- Right to request erasure of your data from our systems and files
- Right to place restrictions on our processing of your data
- Right to object to our processing of your data
- Right to data portability: where we are processing data that you have provided to us, on the basis of consent or as necessary for the performance of a contract between us, you have the right to ask us to provide your data in an appropriate format to you or to another controller.

Most of these rights are subject to some exceptions or exemptions, depending on the purposes for which data is being processed.

If you have any questions or concerns about our processing of your data, please contact the UoH Data Protection Officer (DPO):

Email: [dataprotection@hull.ac.uk](mailto:dataprotection@hull.ac.uk)

Telephone: 01482 466594

Address: University of Hull, Cottingham Road Hull, HU6 7RX, UK

We will always aim to respond clearly and fully to any concerns you have about our processing and requests to exercise the rights set out above. However, as a data subject if

you have concerns about our data processing or consider that we have failed to comply with the data protection legislation then you have the right to lodge a complaint with the data protection regulator, the Information Commissioner:

Online reporting: <https://ico.org.uk/concerns/>

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Tel: 0303 123 1113

Post: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF