KCLSU Members Data Privacy Statement

Last Revised: 22 May 2018
**Introduction**

King's College London Students' Union (“we”, “our” or “us”) promises to respect any personal data you share with us, or that we get from other organisations and keep it safe. We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect.

Developing a better understanding of our members through your personal data allows us make better decisions, communicate more efficiently and, ultimately, helps us to reach our goal of having a positive impact with every KCL student.

**Where we collect information about you from**

We collect information in the following ways:

*When you become a MEMBER*

Each year that you enroll on a King's College London accredited course you automatically become a member of the King's College London Students' Union, unless you opt out. King's College London regularly shares a register of members with us which includes information about you and your course. When the University gives us this data we become responsible for it and will use this as our core central record of your membership.

*When you give it to us DIRECTLY*

You may give us your information in order to purchase a membership to a student group or association, vote or stand in elections, volunteer, for one of our events, take one of our surveys, purchase our products or communicate with us. There may be other ways like when you seek advice from us or if you become employed by us that are covered in our other privacy policies available here. You may give us this information by filling in a form or by scanning your King's ID. When you give us this information we take responsibility for looking after it and we will cross reference this data against our register of members.

*When you give it to us INDIRECTLY*

Your information may be shared with us by others, for example our student groups, societies, associations, event partners or suppliers. These third parties will only do so when they have a lawful basis for doing this. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

*When you give permission to OTHER ORGANISATIONS to share*

We may combine information you provide to us with information available from external sources in order to gain a better understanding of our members to improve our communication methods, products and services.

The information we get from other organisations may depend on your privacy settings or the responses you give, so you should regularly check them.
This information comes from the following sources:

Third party organisations
You may have provided permission for a company or other organisation to share your data with third parties such as the Students’ Union. This could be when you buy a product or service, register for an online competition or sign up with a comparison site.

Social Media
Depending on your settings or the privacy policies for social media and messaging services like Facebook, Instagram, Snapchat, LinkedIn, WhatsApp or Twitter, you might give us permission to access information from those accounts or services.

Information available publicly
This may include information found in places such as Companies House and information that has been published in articles/newspapers.

When we collect it as you use our WEBSITES
Like most websites, we use “cookies” to help us make our site – and the way you use it – better. Cookies mean that a website will remember you. They’re small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

In addition, the type of device you’re using to access our website and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have and what operating system you’re using. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

When you BUY A PRODUCT from us
To place an order with us online, registration is required. At the point of registration, we request certain information including your name, delivery address and email address. This information is required to enable us to process your order and notify you of its progress. Once an order has been placed, we may contact you by email to confirm your order details and again once your order has been accepted and dispatched. Should we need to contact you for any reason regarding your order, we will use the email address registered to your account, or the telephone number where provided. The Students’ Union does not store any sensitive card data (e.g. the long card number or CVV code on your card) on our systems following online transactions. The Union utilises payment processor WorldPay and ecommerce experts MSL to handle these matters.

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

Our Members
If you are one of our members the University, in response to their obligations to you, provide us with a set of key information you provided at enrollment. When you use our services or participate in one of our activities we will use this information to provide the best possible standards of administration and communication. The information provided to the Students’ Union and the data sharing agreement can be accessed here for further information.
In addition when you attend an event, purchase a membership to a student group or use one of our services we may ask for additional information such as:

- Your date of birth to ensure compliance with age-related laws
- Your bank details to facilitate payments
- Information relating to your health if you are taking part in a high risk activity
- Any disabilities so that we can provide assistance where needed

We will mainly use your data to:

- Provide you with the services, products or information you asked for
- Administer your membership
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted
- Understand how we can improve our services, products or information
- Register your membership with National Governing Bodies like British Universities and Colleges Sport

**Personalising communications**

We personalise our communications to ensure communications are relevant and timely, and to provide an improved experience for our members.

We may look at campus location, course and other information relating to you in order to better understand your interests and preferences in order to contact you with the most relevant communications. You may have also asked us to provide you further information about our products and services.

**How we keep your data safe and who has access**

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

- Contractors
- Advisors
- Agents
- Service provider partners

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

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.
Some of our suppliers run their operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law. If you would like more details about this email us on data@kclsu.org

We may need to disclose your details if required to the police, regulatory bodies or legal advisors.

Communications Preferences

Membership Communications
As a member we believe we have a legitimate interest in telling you about what the elected officers are doing, the products and services we offer, what we’re doing to represent you and opportunities that might be of interest to you. Occasionally, we may include information from partner organisations e.g. King’s College London or organisations who support us in these communications.

Controlling what you want to hear about
We make it easy for you to tell us how you want us to communicate, in a way that suits you. Our forms have clear preferences and we include information on how to unsubscribe when we send you emails. If you don’t want to hear from us, that’s fine. Just let us know when you provide your data or contact us on marketing@kclsu.org.

Your rights to your data
The new General Data Protection Regulation (GDPR) and relevant UK data protection legislation sets out rights you may have to your data. They are

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

You can read more about these rights on the ICO website here. The table at the bottom sets out which of these rights may be available depending on our lawful basis for processing your data.
Exercising your rights

To ask us to stop contacting you
We make it easy for you to tell us how you want us to communicate, in a way that suits you. Our forms have clear preferences and we include information on how to opt out when we send you emails. If you don’t want to hear from us, that’s fine. Just let us know when you provide your data or contact us on marketing@kclsu.org.

To ask us for a copy of your data
If you want to access your information, email data@kclsu.org with a description of the information you want to see. To protect you from identity theft we will ask you to verify your identity. Instructions on how you can do this will be provided in the auto-response you receive. We will provide you the data you request within 30 days of you verifying your identity.

If you have any questions please send these to data@kclsu.org.

To ask us to delete your data
We may be able to delete your data if we do not need it to for the purpose you supplied it for (e.g. if you supplied us your name to buy a ticket to an event but did not end up making a purchase). To ask us to delete your data email data@kclsu.org with a description of the information you want to be deleted.

To protect you from identity theft we will ask you to verify your identity. Instructions on how you can do this will be provided in the auto-response you receive. We will delete the data you request within 30 days of you verifying your identity.

To ask us to correct your data
Where any of your information is incorrect, you have a right to tell us to correct it promptly. Please tell us as quickly as possible if you change your email address or other contact details. If your information is incomplete, you can ask us to correct this too. You can do this by emailing marketing@kclsu.org.

To ask us for a copy of your data
You might also be entitled to ask us to restrict our use of your information — for example if you think the information we hold on you is incorrect.

Student groups, societies, associations

Please note we are not the data controller for any websites or social media channels run by Student groups, societies, associations. This includes ROAR, King’s TV and KCL Radio. To exercise your data rights please contact them direct.
Complaints about how a student group, society or association handled your data

If you would like to make a complaint to KCLSU about how a student group, society or association has used your data please email us on data@kclsu.org specifying the name of the group, society or association.

Complaints about our handling of your data

We aim to work with you on any request, complaint or question you have about your personal information. You can get in touch via data@kclsu.org if you have any questions about how we handle your data, you can make a complaint at complaints@kclsu.org.

However, if you believe we have not adequately resolved a matter, you have the right to complain to the Information Commissioner’s Officer (the ‘ICO’). You have a right, at any time, to complain to the ICO. As an independent UK authority, it upholds information rights in the public interest, promotes openness by public bodies and data privacy for individuals. You can visit their website at https://ico.org.uk or ask for details from data@kclsu.org.
<table>
<thead>
<tr>
<th>Our doc ref</th>
<th>Why are we processing your data</th>
<th>What &quot;Special category Data&quot; do we process</th>
<th>How long do we retain your data</th>
<th>What is our Article 6 lawful basis for processing personal data</th>
<th>What is our article 9 lawful basis for processing special category data. Below is an extract of the relevant basis. For the full text visit <a href="https://ico.org.uk">the ICO website</a>.</th>
<th>Rights that may be available to you</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>To provide you membership services to KCLSU members.</td>
<td>ethnicity, disability</td>
<td>6 years from graduation /leaving KCLSU membership</td>
<td>Legitimate interests</td>
<td>(d) processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;</td>
<td>Right to Erasure and object</td>
</tr>
<tr>
<td>2</td>
<td>To facilitate membership activities and groups that you express interest in or join such as sports societies and volunteering.</td>
<td>NA</td>
<td>6 years from graduation /leaving KCLSU membership</td>
<td>Contract</td>
<td>NA</td>
<td>Right to Erasure and portability</td>
</tr>
<tr>
<td>3</td>
<td>To communicate membership services and opportunities by email (e.g. via the weekly officer update) that aid the student experience of those studying at KCL</td>
<td>NA</td>
<td>1 year from graduation /leaving KCLSU membership</td>
<td>Legitimate interests</td>
<td>NA</td>
<td>Right to Erasure and object</td>
</tr>
<tr>
<td></td>
<td>To communicate information about specific products and services by email (e.g. via our Eat, Drink, Shop Email list).</td>
<td>NA</td>
<td>Name, email</td>
<td>1 year from graduation /leaving KCLSU membership</td>
<td>Consent</td>
<td>NA</td>
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<td>4</td>
<td>To generate insights to improve our products and services and to ensure we provide an inclusive service and products and</td>
<td>ethnicity, disability, sexuality</td>
<td>Name, Gender, nationality, student status, postal address, K number, University email address</td>
<td>2 years from completing survey</td>
<td>Consent</td>
<td>(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;</td>
</tr>
<tr>
<td>5</td>
<td>To support KSLCU members to resolve issues, complaints and disputes with the University or external organisations and bodies.</td>
<td>ethnicity, disability, sexuality</td>
<td>Name, Gender, nationality, student status, postal address, K number, University email address</td>
<td>8 years from completion of case</td>
<td>Legitimate interests</td>
<td>(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;</td>
</tr>
<tr>
<td>6</td>
<td>To communicate membership services and opportunities by post to new members to aid the student experience of those studying at KCL</td>
<td>NA</td>
<td>Name, Address, Home Student Status</td>
<td>6 years from graduation /leaving KCLSU membership</td>
<td>Legitimate interests</td>
<td>NA</td>
</tr>
<tr>
<td></td>
<td>To provide event ticketing for Union events/activities and sports and societies events/activities to ensure smooth and effective administration of such events/activities.</td>
<td>NA</td>
<td>Name, Email, K Number</td>
<td>8 years from transaction</td>
<td>Contract</td>
<td>NA</td>
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<td>9</td>
<td>Use of sexuality, disability and ethnicity data to facilitate democratic processes as outlined in the Unions bylaws.</td>
<td>ethnicity, disability</td>
<td>Name, Gender, nationality, student status, postal address, K number, University email address</td>
<td>6 years from graduation/leaving KCLSU membership</td>
<td>Consent</td>
<td>(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;</td>
</tr>
<tr>
<td>12</td>
<td>Photographs used for marketing, publicity etc</td>
<td>NA</td>
<td>Faces and names</td>
<td>8 years from photo being taken</td>
<td>Consent</td>
<td>NA</td>
</tr>
<tr>
<td>15</td>
<td>Buying something on our website (shop products, vouchers, society memberships)</td>
<td>NA</td>
<td>Name, postal address, K number, ID card number (same as student number), email address</td>
<td>8 years from transaction being paid</td>
<td>Contract</td>
<td>NA</td>
</tr>
</tbody>
</table>
Changes to this statement

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