

**PRIVACY NOTICE**

**STUDENTS AND PROSPECTIVE STUDENTS**

**Data Collection and Privacy Notice**

Aston University (“the University”) processes personal data as a “Data Controller” as defined in the Data Protection Act 2018 (“the DPA”) and the General Data Protection Regulation (Regulation (EU) 2016/679) (“the GDPR”). This notice relates to information about you which will be collected by the University and processed as described below. The most up to date version of this privacy notice is published on the University’s website.

**What we collect**

The personal data which we process includes your personal and contact details and information about you which is relevant to your relationship with the University. It may also include information about your disability status, ethnicity, sexual orientation, gender reassignment or religion, which is classed as “Special Category” personal data under the DPA and the GDPR.

**Your rights**

The DPA and the GDPR give you the right to know what information is processed about you and how it is processed. You also have the following rights (limited in certain circumstances):

- to access your personal information;
- to rectify inaccurate information;
- to restrict processing of your information; and
- to object to processing of your information.

**Data transfers to other countries**

Your personal data may be transferred to countries outside the European Union for the purposes described above. The University will only transfer personal data outside the European Union where adequate safeguards are in place.

**Navigating this privacy notice**

<b>Status</b>	<b>Relevant Pages</b>
Prospective Applicant	Pages 2 and 7
Applicant	Pages 3 and 7
Students	Pages 4 and 7
Staff as Students	Pages 4, 6 and 7

## HOW WE PROCESS YOUR DATA

### PROSPECTIVE APPLICANTS

#### **Enquiries to Study at the University**

We will process your personal data in order to respond to any enquiry you may have about the University such as requesting a prospectus or finding out more about University courses.

This processing is necessary on the grounds of our legitimate interest (GDPR Article 6(1)(f)).

#### **Registration at Events**

Attending events is the ideal way to visit the University, experience it and obtain further information on the courses which may be of interest to you. We will process your personal data when you register to attend an event at the University.

This processing is necessary on the grounds of our legitimate interest (GDPR Article 6(1)(f)).

#### **Participant Data**

The University will process your personal data to assess and evaluate how well its outreach initiatives are operating. This will include information regarding your studies, where you live and extra-curricular participation.

This processing is necessary on the grounds of performing a public task (GDPR Article 6(1)(e)). The processing of Sensitive Categories of Data is necessary on the grounds of performing a public task (GDPR Article 6(1)(e)) and acting in the public interest (GDPR Article 9(2)(g)).

#### **Higher Education Access Tracker (“HEAT”)**

The University will process your personal data through HEAT. The HEAT service is operated by the University of Kent who analyse the data submitted by the University and then produce reports which are intended to support outreach initiatives, fair access to the University and the retention of students. The HEAT service complies with the appropriate regulatory requirements and uses government data as part of its service. The University will use this service to evaluate how well its outreach initiative is operating to individuals and institutions.

This processing is necessary on the grounds of performing a public task (GDPR Article (6)(1)(e)). The processing of Sensitive Categories of Data is necessary on the grounds of performing a public task (GDPR Article 6(1)(e) and on the grounds of research of statistical purposes in the public interest (GDPR Article 9(2)(g)).

## APPLICANTS

### **Applications to the University**

The University will process your personal data when it receives your application. We will also process your personal data from third party sources such as UCAS, Government Departments, the Student Loans Company and agents (if applicable). This is to assist us with the application process and understand key aspects of information which relate to your University experience. In the event that you are successful, your application will form the basis of your student record at the University.

This processing is necessary on the grounds of our legitimate interest (GDPR Article 6(1)(f)). The processing of Sensitive Categories of Data is necessary on the grounds of our legitimate interest (GDPR Article 6(1)(f)) and for statistical and research purposes in accordance with GDPR Article 9(2)(j).

### **International Advice**

We will process your personal data when you apply to the University and require advice on international matters related to your study at the University.

This processing is necessary on the grounds of our legitimate interest (GDPR Article 6(1)(f))

### **UK Visas and Immigration (“UKVI”) Exports/Imports**

The University is required to meet its obligations set out by UKVI and will need to adequately report on applications. We will process your personal data in respect of your applications as part of our reporting obligations (as appropriate).

Where relevant, this processing is necessary on the grounds of our obligation to perform a public task (GDPR Article 6(1)(e)) as this processing is required for the University to meet its obligations set out by UKVI. The processing of Sensitive Categories of Data is necessary on the grounds of our obligation to perform a public task (GDPR Article 6(1)(e)) and for reasons of substantial public interest in accordance with GDPR Article 9(2)(j)).

### **Financial Assistance and Enquiries**

We will process your personal data in order to respond to any enquiry you may raise about the University which includes any financial matters such as scholarships.

This processing is necessary on the grounds of our legitimate interest (GDPR Article 6(1)(f)).

## STUDENTS

### HESA Information

We will provide your personal data to the Higher Education Statistics Agency (“HESA”), who will use your data for the purposes set out in the HESA Data Collection Notice, which can be found at [https://www.hesa.ac.uk/files/HESA\\_Student\\_Collection\\_Notice\\_2017-18.pdf](https://www.hesa.ac.uk/files/HESA_Student_Collection_Notice_2017-18.pdf).

Processing of your HESA information is necessary for the performance of a task carried out in the **public interest** or in the **exercise of official authority** vested in the Data Controller (See GDPR Article 6(1)(e)) and for statistical and research purposes (See GDPR Article 89). Processing of Special Categories of data is necessary for statistical and research purposes in accordance with Article 89(1) based on the duties in the Equality Act 2010 (See GDPR Article 9(2)(j)).

### Enrolment at the University

We will process your personal data when you enrol at the University. This is to assist us with the enrolment process and understand the key aspects of information which will relate to your study at the University. This will include your University identification card which will be retained on the University’s system. The University has engaged a third party to support and assist with the printing of identification cards. The University will share your personal data with the third party to ensure that identification cards are generated on an expedited basis.

This processing is necessary on the grounds of our legitimate interest (GDPR Article 6(1)(f)).

### Events

The University will ask you if you want to attend events to assist with your learning and University experience. We will process your personal data to ensure that you are signed up to events and run reports on the attendance of events. You may attend events which focus on placements and future careers, so we will process your personal data to advertise vacancies and opportunities to you based on your preferences.

This processing is necessary on the grounds of our legitimate interest (GDPR Article 6(1)(f)).

### Student Record

The University will process your personal data as part of your student record. This will contain the essential information that you will need throughout your academic career. The University will process your personal details in respect of your award, your attendance and dates studied at the University. It is fundamental that the University retains this data permanently and it is unable to erase this information.

This processing is necessary on the grounds of the University performing its obligations under our contract with you (GDPR Article 6(1)(b)). It is also necessary on the grounds of performing a task in the public interest (GDPR Article 6(1)(e)) and also on the grounds of the University’s legitimate interest (GDPR Article 6(1)(f)).

**Careers and Placements**

Employability and placements are a fundamental part of your experience at the University. As this is a core aspect of your study at the University, we will process your personal data to record your attendance and monitor your progress. This will also include support from the Careers and Placements Team which includes updates and invitations regarding job opportunities and a placement year.

This processing is necessary on the grounds of the University's legitimate interest (GDPR Article 6(1)(f)).

**Mentoring**

You may sign up to be involved in mentoring sessions when enrolled at the University. We will process your personal data to record mentoring participation and evaluate the success of mentoring schemes.

This processing is necessary on the grounds of the University's legitimate interest (GDPR Article 6(1)(f)).

**Digital Usage**

The University will process your personal data when you use its digital facilities. This is to ensure that the University ensures its systems are secure and they are being used appropriately in accordance with its Information Security Policy.

This processing is necessary on the grounds of our legitimate interest (GDPR Article 6(1)(f)).

**Appeals/Complaints/Disciplinary**

Although the University does not envisage incidents involving appeals and complaints, it needs to ensure that it administers its policies and procedures in respect of students and considers appeals, complaints and disciplinary matters seriously. This also includes matters related to cheating and plagiarism. The University will therefore process your personal data to ensure that it deals with these procedures accordingly.

This processing is necessary on the grounds of our legitimate interest (GDPR Article 6(1)(f)). The University needs to ensure that it administers its policies and procedures in respect of appeals, complaints and disciplinary matters.

**Learning Analytics**

The University wishes to improve the students' experience and uses learning analytics to collect data to make the University progress. We will process your personal data to record attendance and use of the University's facilities.

This processing is necessary on the grounds of our legitimate interest (GDPR Article 6(1)(f)).

**Reporting to Professional/Accreditation Bodies**

The University may be required to process your personal data to professional bodies, for example if you are undertaking a medical degree. In these instances, we will process your personal data to the relevant bodies.

This processing is necessary on the grounds of performing a task in the public interest in accordance with GDPR Article 6(1)(e)).

**Reporting to Financial and Government Bodies**

The University may be required to process your personal data to financial organisations such as the Student Loans Company and US Loans for their reporting requirements. We may also be required to process your personal data in order to report to UK Visas and Immigration to ensure compliance with visa conditions.

This processing is necessary on the grounds of performing a task in the public interest in accordance with GDPR Article 6 (1)(e).

**Virtual Graduation Ceremonies**

The University reserves the right to stream its graduation ceremonies on its social media channels. Graduations are public events and this processing will be on the basis of the University's legitimate interests.

**Graduation Publicity**

The University would like to include your details in publications including the University's graduation brochure and external publications, including the Birmingham Mail. This will be done on the basis of your consent.

- I consent to my personal data being used in the University's graduation brochure
- Please do not use my personal data in the University's graduation brochure
  
- I consent to my name and programme studied being provided to third parties for publication
- I do not consent to my name and programme studied being provided to third parties for publication

**STAFF AS STUDENTS**

**Performance and Progress**

We will process your personal data in respect of your performance and progress on a programme. This will include sharing your personal data with your line manager in respect of your performance.

This processing is necessary on the grounds of the University's legitimate interest (GDPR Article 6(1)(f)).

**Additional Courses/Qualifications**

We are keen to support your development and will process your personal data to ask you if you are interested in any further courses to obtain further qualifications at the University.

This processing is necessary on the grounds of the University's legitimate interest (GDPR Article 6(1)(f)).

**ALL STUDENTS AND APPLICANTS**

**Third Party Agreements**

Prospective Applicants:

The University has engaged a third party to support and assist with any enquiries that you may have about the University. The University may share data with this third party to ensure that enquiries are dealt with in a timely manner.

Applicants:

The University engages with relevant third parties to support and assist with any enquiries that you may have in respect of enrolling at the University depending on the nature of your application. These third parties include partner organisations such as AUEA, the GBSIoT and ONCAMPUS Aston. The University may share data with these third parties to ensure that enquiries are dealt with in a timely manner.

Students:

The University has a number of agreements with third parties which includes agreements with employers of apprentices studying at the University. The University will disclose information to these third parties relating to your progress, attendance and results. The University will also process your personal data for the purposes of the Higher Education Achievement Report (“HEAR”). HEAR is a report used by a number of Universities which offers a number of benefits to students and the University and also comprehensively records students’ achievement. The University will process your personal data in order to comply with its obligations under its agreements with third parties to ensure that students’ achievements (including progress, attendance and results) and experience at the University is reported.

This processing is necessary on the grounds of the University’s legitimate interest (GDPR Article 6(1)(f)).

**Marketing**

We value your interest in the University and would like to keep in touch with you. We would like to use your personal details for the purpose of sending you marketing materials such as invitations to open days, events at the University, newsletters and magazines by post and email. We value your engagement with the University while you are a student and would like to keep you up to date with information pertaining to student life. We would also like to invite current students to events and activities taking place on campus

We will process your personal data in the case of communication by email for these purposes on the basis of your consent. You have the right to opt out of this type of processing at any time. We will not contact you for this purpose if you are registered with the Telephone Preference Service (“TPS”) unless you tell us that we can.

I consent to my personal data, including my personal email address, being processed so the University can contact me to share news and invite me to events. I understand that I may opt out of receiving these communications at any time.

- Yes please, keep me up to date by email
- Please do not contact me by post
- Please do not contact me by telephone

I consent to my personal data, including my personal email address, being processed so the University can contact me by email for marketing purposes. I understand that I may opt out of receiving these communications at any time.

- Yes please, you can email me
- Please do not contact me by post
- Please do not contact me by telephone

### Photographs and Video

We may wish to process your personal data in order to take photographs of you to use in the University's marketing campaigns, on its website and displays. The photographs may include your name and details about you. In addition, we may wish to use videos of you in the University's marketing campaigns, on its website and YouTube account. The videos may include your name and details about you.

We will process your personal data for this purpose on the basis of your consent. You have the right to opt out of this type of processing at any time. However, in the event that you withdraw your consent on promotional campaigns which have already been published, we will ensure that your image is no longer processed in any future campaign.

I consent to my personal data, including my image and name being processed so the University is able use it in marketing campaigns, on its website and displays. I understand that I may opt out of my personal data being processed at any time.

- I consent to my photograph being used on the University website
- I consent to my photograph being used in poster campaigns at the University
- I consent to my photograph being used in printed communications
- Please **do not** process my photographic image for any marketing campaign
  
- I consent to my video image being used on the University website
- I consent to my video image being used on the University's YouTube account
- Please **do not** process my video image for any marketing campaign

### Surveys

#### Prospective Applicants and Applicants:

It is important that we understand your views about the University so we will process your personal data when you complete surveys for experiences such as open days. The University wants to ensure that it continues to develop and improve what it offers to potential students so participation in such surveys is important to the University.

#### Students:

It is important that the University understands whether it is providing a satisfactory service so it will process your personal data when you complete surveys. This allows us to see whether any improvements can be made. We will also process your personal data when you complete surveys to assess how the student experience and the services the University provides has benefitted you. Some surveys are used to inform Aston's performance in rankings and league tables, so participation is important to the University, its students and its graduates.

This processing is necessary on the grounds of our legitimate interest (GDPR Article 6(1)(f)).

**Specific Requirements**

The University will process your personal data in the event that you have any specific requirements when visiting the University. This may include data regarding any disability and is used in order to allow us to assist you and your experience at the University.

We will process Special Categories of Data (e.g. information relating to health, disability or mobility requirements) if you have made us aware of such information (GDPR article 9(2)(e)). This information will be used to enable us to provide the appropriate services and assistance during your time at the University.

**Security**

Your safety and security is very important to the University. We will process your personal data, including images captured by CCTV, to ensure the safety and security of you and your possessions, and to secure the University's campus. In certain circumstances we may also use body-worn video cameras. The use of CCTV on our premises is governed by Aston University's CCTV Code of Practice.

This processing is necessary on the grounds of our legitimate interest (GDPR Article 6(1)(f)).

**Emergencies**

There may be circumstances where the University needs to contact an emergency contact that you have specified or the emergency services in the event of an accident or illness.

We will process your personal data on the grounds of vital interests (GDPR Article 6(1)(d)). The processing of Sensitive Categories of Data is necessary on the grounds of the University protecting your vital interests (GDPR Article 9(2)(c)).

**Public and Administrative Functions**

We will process your personal data for reasons related to our statutory and/or public functions, including funding, regulation and policy-making purposes. This may also include data processing for statistical and research purposes. We may also need to process your data, including sensitive/special category data, for the purposes of law enforcement and fraud detection.

This processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller (GDPR Article 6(1)(e)).

**Compliance with NHS Test and Trace**

If you attend Aston's campus, we are required to process your personal data to comply with the requirements of NHS Test and Trace (or any superseding or replacing framework). Your data may be shared with Public Health England (or any successor body) and other public bodies in order to fulfil these obligations.

We will process your personal data for this purpose on the grounds of our legal obligation (GDPR Article 6(1)(c)). Special Category Data will be processed on the grounds of substantial public interest (GDPR Article 9(2)(g)).