

Coventry University

General Privacy Notice

Who are we?

In this Privacy Notice, the terms "**we**", "**our**", and "**us**" refer to Coventry University Higher Education Corporation, Priory Street, Coventry, United Kingdom, CV1 5FB (ICO registration number Z6939585).

As a controller of your personal data we are responsible for looking after it, and we will use it fairly, lawfully, and in a transparent manner.

Purpose

We are committed to protecting your privacy. This notice will help you understand how we look after, use, store and share your personal data, and how we meet our obligations under the General Data Protection Regulation 2016 and the Data Protection Act 2018 (Data Protection Laws). It supplements any other notices or statements we may provide to you.

We have specific notices in place which explain how we process your personal data if you are an applicant, a student, a former student, an employee, an applicant for employment, or if you are attending a graduation ceremony. Please click through to access these notices.

What personal data do we collect?

"Personal data" is any information from which you can be identified, e.g. name, date of birth, contact details, identification numbers, photographs, and expressions of opinion about you.

The type of personal data we collect, and how we process it, can vary depending on your interactions with us. We have grouped it together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, university ID number.
- **Contact Data** includes address (home, postal or other physical address), email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website, products and services, and whatever particular information you are interested in.

Special Category Data

We may process your 'special category data' such as:

- racial or ethnic origin;
- religion;
- political views;
- trade union membership;
- genetics and biometrics (where used for ID purposes);
- health and disabilities; and

- sex life and sexual orientation.

We will only process this data where you have given your explicit consent for us to do so; where you have manifestly made the personal data public; or when that processing is legally required.

Where do we get your personal data from?

We collect your personal data directly from you; during your visits to our website; if you attend our events; or through any other communication you have with us.

Except for your IP address data, when visiting our website we will only collect personal data when it is voluntarily submitted.

Information that you give us	<p>You may share personal data about yourself and your circumstances by:</p> <ul style="list-style-type: none"> • providing information via on-line forms; • filling in feedback forms or questionnaires; • reporting a fault with the Coventry University Website; • giving us information about yourself in any communications with us either by telephone, e-mail, post or otherwise. <p>We need you to provide personal data in the situations listed above so we can support you or give you information that you need, and so we can comply with our legal obligations.</p> <p>If you do not provide this data, it may mean that we will be unable to deal with your query or complaint or provide you with the level of service that we usually provide.</p>
Information that we collect about you	<ul style="list-style-type: none"> • details of your visits to our website including, but not limited to, Internet Protocol (IP) address used to connect your computer to the internet; MAC addresses; traffic data, location data; your login information; time-zone setting browser type and version; browser plug-in types and versions; operating system and platform; weblogs; cookies and other communication data; and the resources that you access. For more information please see our Cookies Notice; • data including your name and images captured on body-worn cameras or CCTV when you visit one of our campuses; • as part of the events organised at our campuses and their associated buildings, as necessary for our legitimate interests, third party photographers may be on site. If you do not wish to be included in any photographs or live streamed events (such as graduation ceremonies which are recorded and available online), please ensure that you clearly express your wishes to a member of our staff or directly to the third parties.
Information that we receive from other sources	<p>We may receive personal data about you from other third parties, including other members of the Coventry University Group (including as part of our Case Reporting System).</p>

Please note that we may combine personal data we receive from other sources with personal data you give to us and personal data we collect about you.

Why do we need personal data and how do we use it?

- Personal details given to us by you via on-line forms will be used to provide you with information, goods or services you have requested, such as course brochures or prospectuses. The details you provide will not be used for marketing purposes unless you have been informed of this and have expressly consented to having your details used for this purpose.
- Information provided by you via feedback forms or questionnaires will be used as necessary in our legitimate interests to improve our site.
- We may use the personal data you give us to provide you with information that is tailored to you, or to give you access to particular events or webinars.
- Information provided by you when reporting a fault with the Coventry University Website will be used for the purposes of rectifying that fault as necessary for the legitimate interests of Coventry University.
- If you contact us we may keep a record of that correspondence so as to deal with and/or respond to you, as necessary for the performance of any contract with you or in order to take steps at your request prior to the entering into a contract, and/or where such processing is in the legitimate interests of Coventry University.
- Personal data provided as part of any online application process for an employment opportunity shall be processed so as to allow us to process and evaluate the merits of that application, in accordance with our legitimate interests.
- We will keep records of attendance (and that of your guests) on visits across our campus, including visitor logs, details of any payments made, photographs and video recordings in which you may be included (CCTV), in order to operate security.
- To safeguard students and staff by providing safe and secure environments and meeting health, wellbeing and duty of care requirements, in line with Health and Safety legislation, throughout the duration of their studies and/or employment.
- If you submit a Freedom of Information Request or a Data Subject Access Request we will keep a record of that correspondence so as to deal with and/or respond to your request. We need information from you to respond to you and to locate the information you are looking for. This enables us to comply with our legal obligations under the legislation we are subject to. When we receive a request from you, we'll set up an electronic case file containing the details of your request. This normally includes your contact details and any other information you have given us. We'll also store, on this case file, a copy of the information that falls within the scope of your request in order to maintain adequate records of information we have made public and/or released to you.
- Any disclosure requests submitted to Coventry University will be recorded so as to deal with and respond to them. When we receive a request, we'll set up an electronic case file containing the details of the request, which will include contact details and any other information given to us to support the request. We'll also store, on this case file, a copy of the information that falls within the scope of the request, in order to maintain adequate records of information we have disclosed.
- Similarly, if you report a data breach we will set up an electronic case file containing the details of the breach and we will keep a record of our correspondence with you. We need information from you to contain and mitigate the risk. This enables us to comply with our legal obligations under the legislation we are subject to.

- If you are a supplier, partner institution, agent, research collaborator, volunteer or any other third party working with Coventry University we will collect, store and use personal data about you when the law allows us to, mainly in circumstances such as: performing a contract we have entered or wish to enter with you, where we need to comply with a legal obligation, where we need to protect your (or someone else's) interests or where it is needed in the public interest or for official purposes.
- When you visit a member of staff or, in some instances, when you attend an event on campus, we will process your data such as name and vehicle registration number in order to provide you with a parking permit, if any are available. Where applicable we may also process disability information, in order to make reasonable adjustments for accessible parking.

Other uses of your personal data.

- To ensure that content on the Coventry University Website is presented in the most effective manner for you and your computer as necessary in our legitimate interests.
- To allow you to participate in interactive features of the Coventry University Website, if/when you choose to do so, whether this be prior to you entering into any contract or agreement with Coventry University or as a result of the same.
- To notify you about any changes to Coventry University or the courses or services offered (where it is necessary in the performance of our public task functions, or where it is in our legitimate interests to do so) and:
 - where you have expressed an interest in the same previously; or
 - where you have expressly opted in to receiving such communications.

If you do not want to receive such communications, you can opt out at any time thereafter by clicking the "unsubscribe" or "opt out" link.

We may also collect, use and share aggregated data (e.g. statistical or demographic data) for any purpose. This data may be derived from personal data, but is not considered as such in law as it does not reveal your identity. However, if we combine or connect aggregated data with your personal data, so that it can identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

Legal Claims

Personal data, including special category data, may be processed for the purpose of establishing, exercising or defending a legal claim.

Basis for using your personal data

We need a legal basis for any processing of personal data. This means that our processing must be for one of a limited number of reasons set out in the data protection laws. The legal bases that we rely on are:

The processing is necessary for the entry into or performance of a contract

When we provide our services to you, we enter into a contract with you. For us to deal with any enquiry or request made by you prior to entering into a contract, and to fulfil our obligations under it, we will need to collect, process and share (as further detailed below) your personal data. Please note that we may not be able to enter into a contract with you or provide the services under it if you: do not provide us with the personal data required; object to the type of processing we need to do; or exercise your right to have your personal data deleted.

Compliance with a legal obligation

Sometimes we process your personal data because we are legally obliged to do so, for example: in some of the circumstances listed above; in relation to the prevention of crime; or because we may be required to share your data with certain statutory bodies.

The processing is necessary for the performance of a task carried out in the public interest

We may need to process your personal data in order to carry out our public interest task as a university, such as providing higher education or conducting research.

Legitimate interests

We may use your personal data (excluding special category data) as set out in this Privacy Notice for the legitimate interests of Coventry University including:

- improving the quality and functionality of our website;
- keeping adequate records; and
- enabling us to engage with you so that we can provide you with services.

We will always balance our legitimate interests in processing your personal data against your privacy rights.

Legitimate interest	<p>We have a legitimate interest in processing your personal data as:</p> <ul style="list-style-type: none">• you benefit from the provision of the services we provide;• we both benefit from the ability to enforce or apply rights under any contract between us;• we need to optimise the appearance of content on our website;• we need to maintain and improve the quality of any services we provide to you; and• we need to be able to notify you about any changes to Coventry University or the courses or services we offer.
Necessity	<ul style="list-style-type: none">• the processing is necessary for the purposes outlined in this Privacy Notice.
Impact of processing	<ul style="list-style-type: none">• such processing does not unreasonably intrude on your privacy.

Vital interest

We consider it reasonable to process personal data for the protection of any interests that are essential for someone's life.

Consent

Generally, we do not rely on consent as a legal basis for processing your personal data other than for sending third party direct digital marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

Where we wish to use your image in promotional videos and photographs, we will first obtain your consent.

If we require your consent to process your personal data in any other circumstances, we will contact you separately to request this.

Processing of your personal data

"**Processing**" means doing anything with the personal data, such as collecting, recording, organising, structuring, storing, adapting or altering, retrieving, accessing, consulting, disclosing, disseminating, aligning or combining, restricting, erasing or destroying or using the data in any way.

We will process your personal data for the purposes set out above, or as we otherwise notify you.

The personal data you provide will be subject to security measures and procedures to minimise the risk of unauthorised access, loss, theft or disclosure.

Your personal data will not be used for the purposes of automated decision making.

How long do we keep your personal data for?

We will only keep your personal data for as long as we need to in order to fulfil the purposes for collecting it, including satisfying any legal, accounting, or reporting requirements.

We consider a number of factors in deciding how long to keep your data: the amount, its nature and sensitivity, the potential risk of harm from unauthorised use or disclosure; the purposes for processing it, and whether we can achieve those purposes through other means; and the applicable legal requirements.

Who do we share your personal data with?

Your personal data will only be disclosed to relevant employees of Coventry University and our third party service providers. This is so they can carry out their day to day activities (in relation to the provision of education and ancillary services) or to provide information to you.

It will not be disclosed to other third parties unless we are under a legal duty to do so; in order to enforce any agreements that we may have entered into with you; or to protect the rights, property or safety of Coventry University, its students, staff or others. This includes exchanging information with organisations for the purposes of fraud prevention and credit risk reduction.

We will get your express consent before we share your personal data with any third party for marketing purposes, or before we send you relevant third-party information on their behalf.

We may engage third parties to provide processing activities where it is necessary for our public interest functions and/or our legitimate interests to do so (including processing for administrative and practical purposes such as open days). We require that all third parties who process personal data on our behalf to treat it in accordance with the Data Protection Laws. We do not allow our third-party service providers to use your personal data for their own purposes, but only to process it for specified purposes, and in accordance with our instructions. Such processing is to be conducted under a formal agreement, which includes provisions around the processing of personal data and which provides appropriate safeguards.

Keeping your personal data secure

We are committed to the protection and security of your personal data. We will ensure that appropriate measures are taken against its unlawful or unauthorised processing, and against its accidental loss or damage. We are certified to Cyber Essentials.

Other countries your personal data will be sent to and why

Your personal data may be transferred across international borders. It may be transferred to countries that have different levels of data protection to the United Kingdom.

We may need to transfer your personal data outside of UK and/or to other countries outside of the [European Economic Area \(EEA\)](#), to other members of the Coventry University Group, partner organisations, or our suppliers and service providers. Whenever we do this, we ensure an equivalent level of data protection by using appropriate safeguards, i.e. it is only processed in accordance with UK data protection laws;

- we transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- we transfer your personal data to service providers who have agreed to contractual terms approved by the European Commission, which give personal data equivalent protection as in the UK and European Union; or
- we transfer your personal data to providers based in the US if they are subject to the EU-US Privacy Shield. This requires them to provide a level of data protection which is equivalent to laws of the European Union and UK.

Please contact us if you want further information on the specific mechanism we use when transferring your personal data out of UK and other countries outside of the EEA.

We keep our mechanisms for transferring personal data outside of the UK and/or the EEA under regular review to ensure that these are in line with UK data protection laws.

How we may contact you

Please note that we may contact you in connection with the purposes set out above, by post or by electronic means (including telephone, text messages, email, social media messaging, or any other suitable electronic method).

Your Data Protection Rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data that we hold about you, and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data that we hold about you corrected, although we may need to verify the accuracy of the new personal data.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data if:

- there is no good reason for us continue processing it;
- you have successfully exercised your right to object to processing (see below);
- you believe we may have processed your personal data unlawfully; or
- we are required to erase your personal data to comply with the law.

Please note that we may not be able to comply with your request for specific legal reasons which, if applicable, will be notified to you.

Object to processing of your personal data when we are relying on public task or a legitimate interest (or those of a third party), and you feel that this processing impacts on your fundamental rights and freedoms. However, these may be overridden by the public interest or our legitimate interest grounds.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the accuracy of the data;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold the data even if we no longer require it (for example if you need it to establish, exercise or defend legal claims); or
- If you have objected to our use of your data, but we need to verify whether we have overriding public interest or legitimate interest grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated data that you initially provided consent for us to use, or where we used the data to perform a contract with you.

Withdraw consent at any time when we are relying on consent to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. You can ask us to stop sending you marketing messages at any time by following the “unsubscribe” (or similar) links on any marketing message sent to you, or by contacting us at any time.

When you opt out of receiving these marketing messages you will no longer hear from us in that regard.

Exercising your rights

If you wish to exercise any of your above rights, please send a written request to the Information Governance Unit, Coventry University, Portal House, 163 New Union Street, Coventry, CV1 2PL, or email dsar@coventry.ac.uk.

You will not have to pay a fee to exercise any of your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information, in order to speed up our response.

We try to respond to all legitimate requests within one month, although it may take us longer if your request is particularly complex, or if you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints and questions

We have appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any concerns or complaints about it, please contact the Data Protection Officer at Coventry University, Priory Street, Coventry CV1 5FB or email dpo@coventry.ac.uk.

If you are not satisfied with the proposed resolution of your complaint, you have the right to contact the Information Commissioner's Office. Further information can be found on the Information Commissioner's website at www.ico.org.uk or via their helpline on 0303 123 1113.

We reserve the right to update this Privacy Notice at any time. Any updated versions will be made available on our website.

Feedback

If you have feedback for us about this privacy notice, please let us know by emailing enquiry.igu@coventry.ac.uk.