

Privacy Notice – Sustainability

Background

This Privacy Notice is designed to explain how and why information about individuals in the following categories is used and managed:

• Staff/Students and others using Sustainability services

All of the personal information will be treated in accordance with the terms of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR). This means that confidentiality will be respected and that appropriate security measures will be taken to prevent unauthorised disclosure. This notice is intended to meet the transparency requirement of the legislation and to ensure that all individuals in the categories above know how their data will be processed.

Using your personal information

Who will process my information?

Under Data Protection law the University is the "data controller". This means that the University is responsible for how it uses and processes your information and complying with requests relating to your personal data.

Why do we collect and use your personal information?

The University collects, holds and uses information about you for a number of reasons including:

- Estimating and reporting the aggregated impact of student and staff commuting to the University
- Seeking user feedback and insights about the University's environmental initiatives
- Identifying opportunities and promoting more sustainable behaviours
- Distributing environmental newsletters
- Managing the loan of free lockers for students
- Promoting furniture re-use amongst staff
- Managing prizes for individuals sharing feedback about the University's environmental initiatives

Keeping information updated

The University strives to ensure that all personal information is accurate and up to date.

- Data not used for newsletter: only kept for the duration required by individual projects (as specified by the data subject) or as long as the staff member keeps an account open (e.g. Warp-It).
- Data used for newsletters: Data subjects have the opportunity to update their details as and when they feel its appropriate (including unsubscribing from newsletter). Graduation year used to check mailing preferences after student leave the University, where individuals have to opt-in to retaining their newsletter subscription.

How long is the information kept?

The University will retain your information only for as long as necessary for the purposes described.

Further information is available in the University Records Retention Schedules: <u>https://www.gcu.ac.uk/recordsmgt/</u>

1. Data not used for newsletter – Only kept for the duration required by individual projects.

- 2. Data for newsletters:
 - Students Until the summer after their graduation (unless they update their preferences)
 - Staff Until they unsubscribe (with annual reminder)
 - Alumni/friends Until they unsubscribe (with annual reminder)

Where do we obtain information from?

Information is provided by data subjects using Google Forms, Mailchimp Registration Forms, myPTP (Liftshare) and Warp-it.

What information is being collected and used?

Data will consist of the information provided by the "data subject" or a company acting on behalf of the University. Information may be in hard copy or electronic format. This includes:

• Information collected from students and staff including name, email address, graduation year, post code, student identification number and programme of study.

Who is the information shared with?

Your information will be shared internally only with those individuals who require it in the course of their duties.

The University may be required to share your personal information with external organisations. This may happen due to a statutory or legal obligation.

Data may be shared with third-party data collection tools for example Goolge Forms, Mailchimp, MyPTP (Liftshare) and Warp-it.

How is the information kept securely?

Information is kept securely on University equipment in line with University Information Security and Data Protection Policies. Access is restricted to only those staff or authorised agents who require it and on a "need to know" basis.

Information is password protected in either the University's servers or third-party data collection tools.

Will the information be used for automated decision-making?

No.

Is the information transferred outside the European Union?

Data stored on University servers, MyPTP (Liftshare) and Wrap-it are processed within the EU.

Data processed through Google Forms and Mailchimp is kept outside the EU which is managed in accordance with the EU-U.S. Privacy Shield Framework.

Your rights

You have the right to:

- Find out what personal data we process about you and to request a copy of the data
- Ask us to correct inaccurate or incomplete data
- Withdraw consent to process your personal data, if you were asked for and provided consent

If you think we are acting unfairly or unlawfully you can:

- Object to the way we are using your data
- Complain to the UK Information Commissioner's Office

Under certain conditions you also have the right to ask us to:

- Restrict the use of your data
- Erase your information or tell us to stop using it to make decisions about you

• Provide you with a portable electronic copy of data you've given us

Please contact us if you wish to exercise/enquire about any of these rights.

Contact Details

Data Protection Officer (DPO) Department of Governance Britannia Building Glasgow Caledonian University Cowcaddens Road Glasgow G4 0BA

Email: dataprotection@gcu.ac.uk

Legal basis for using your information

The legal condition which enables the University to process personal information is found in Article 6 of the General Data Protection Regulation (GDPR). In particular we rely on:

- Article 6(1)(a) consent
- Article 6(1)(b) performance of a contract
- Article 6(1)(c) compliance with a legal obligation
- Article 6(1)(e) performance of a task in the public interests/exercise of official authority

Further information

The Information Commissioner's Office website: <u>http://www.ico.org.uk</u>

The University's Data Protection webpages: <u>https://www.gcu.ac.uk/dataprotection/</u>

Further information is available in the Student Privacy Notice and Staff Privacy Notice: <u>https://www.gcu.ac.uk/dataprotection/</u>