## **Introduction**

Kingston Students’ Union (“we”, “our” or “us”) promises to respect and protect any personal data you share with us, including data we receive from other organisations. We aim to be clear when we collect your data and would not do anything you wouldn’t reasonably expect.

Developing a better understanding of our members through your personal data allows us to make better decisions, communicate more efficiently and, ultimately, helps us to reach our goal of having a positive impact on every Kingston student, as defined in our charitable objectives.

## **When do we collect information about you?**

We collect information in the following ways:

### **When you become a member**

### When students enroll in a Kingston University accredited course, they automatically become members of the Union, unless they opt out. The University shares a register of members with the Union, including information about the student and their course. This data is used as the Union's core record for membership management​

### **When you give it to us directly**

### Students may directly provide personal information when signing up for student groups, events, workshops, using services, or purchasing products. This data is cross-referenced with the membership register

### **When you give it to us indirectly**

Personal data may also be collected indirectly from independent organizations or third parties when students have consented to share this data with the Union. This could occur through purchases, event participation, or online interactions​. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

### **When you give permission for 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 and 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: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, WhatsApp or Twitter, you might give us permission to access information from those accounts or services. **Our website**
Information is collected through cookies when using the Union's websites, including device type, operating system, and browsing behavior​. Like most websites, we use “cookies” to help us make our site – and the way you use it – better. Cookies mean 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. There are more details in our Cookies Statement.

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.

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

**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. We also ask if you will provide us with your Student ID number when you shop in store, this allows us to track the products you purchase, provide better customer service standards and develop the product range we offer to students. If you purchase products in person, you are under no obligation to provide us with this information.

**How does Kingston Students’ Union process the data:**

**Purpose:** The Union uses the personal data to provide requested services, manage memberships, improve user experiences, and for marketing purposes. Data may be processed to administer memberships, communicate relevant information, or improve the student experience​.

We may use your information 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 where relevant details of which can be found in our NGB register
* Identify how we can make your experience with your Union better.

When you’re joining an event, student group, use one of our services or take part in an activity run by us, we may ask for additional information where necessary, such as:

* Your bank details to facilitate payments
* Information relating to your health if you are taking part in a high-risk activity

**Data Sharing**Personal data may be shared with Union employees, Kingston University, contractors, advisors, and service providers, but only under controlled conditions and for purposes relevant to Union activities. Data is not sold or shared with other organizations for unrelated purposes​(Privacy Policy)​(Privacy Policy). Our service provider, MSL, act as a third-party data processor who will have access to your information in order to perform functions and services on our behalf but are not authorised by us to use such data for any other purposes.

**Data Profiling**With consent, the Union may use profiling and screening techniques to tailor communications and services to better meet the needs and preferences of its members. This involves analysing geographic, demographic, and other data​. Profiling also allows us to target our resources effectively, which members consistently tell us is a key priority for them. We do this because it allows us to understand the background of the people who study at the University and helps us to deliver appropriate services and information to members who need it. Your data would only ever be analysed or profiled through encrypted and protected data processes, which only ever identifies broad statistics. In doing this, we may use additional information from third party sources when it is available.

**Details of the legal basis under which the Union processes personal data:**

Kingston Students’ Union justifies data processing based on legitimate interests, such as managing memberships and providing relevant services to students. Data is processed within carefully assessed parameters, ensuring compliance with data protection regulations and protecting members' rights. Detailed assessments and data protection impact evaluations are conducted to support these activities​.

We retain personal data only for as long as necessary to fulfill the purposes for which it was collected, or as required by law. Specific retention periods are detailed in our Data Retention Policy.

## **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 under strictly controlled conditions the following groups where necessary:

* Kingston University
* Contractors
* Advisors
* 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 or share 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 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. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors. We will only ever share your data in other circumstances if we have your explicit and informed consent.

In the event of a data breach that is likely to result in a risk to your rights and freedoms, we will notify the Information Commissioner’s Office (ICO) within 72 hours and inform you without undue delay

## **Marketing & Communications Preferences**

### **Membership Communications**

As a member we believe you have a legitimate interest in hearing from us about the products and services we offer, what we’re doing to represent you and opportunities that might be of interest to you. You may opt out of these communications at any stage by clicking the unsubscribe link contained within the email or the article notice sent at the beginning of term.

### **Direct Marketing**

As a charity we need to fundraise to provide the services we offer to Kingston University students we do this through our Marketing and Communications Department. We send marketing material on behalf of our trading partners to our members where you have told us that we can. We do not sell or share personal details to third parties for the purposes of marketing.

### **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 marketing preference questions and we include information on how to opt out when we send you marketing. 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 020 8417 2868 or uks-dataprotection@kingston.ac.uk

## **Keeping your information up to date**

We mostly use the record of members provided by Kingston University to maintain accurate data about you as described above. We really appreciate it if you let us know if your contact details change.

## **Understanding the detail of our data security measures**

When we process your data we will have already carefully assessed the lawful justification for doing so, the parameters in which the data is processed, the length of time the data is held for, the secure storage of your data and undertaken impact assessments to ensure your rights are delivered. An overview of this analysis can be accessed here and records of our assessments can be accessed here.

Kingston Students’ Union operates a Data Protection and Information Security Policy which is supported by a practical handbook for our employees and volunteers. All employees and volunteers handling data are required to undertake general data protection training and third parties handling data are required to provide a contract which meets the requirements of the Information Commissioner's Office.

Kingston Students’ Union does not store any sensitive card data on our systems following online transactions. The Union utilises payment processor Stripe and ecommerce experts Vend to handle these matters.

### **Your right to know what data we hold about you, make changes or ask us to stop using your data**

You have a right to ask us to stop processing your personal data, and if it’s not necessary for the purpose you provided it to us for (e.g. processing your membership or registering you for an event) we will do so. Contact us on 020 8417 2868 or uks-dataprotection@kingston.ac.uk if you have any concerns.

You have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them.

If you want to access your information, you must complete the Subject Access Request Form with a description of the information you want to see and the required proof of your identity by post to the Kingston Students’ Union, Kingston University, Penrhyn Road, Kingston Upon Thames, KT1 2EE. We do not accept these requests by email so we can ensure that we only provide personal data to the right person.

If you want to opt-out of all communications and data processing you will be required to surrender your membership to the Students’ Union which will limit your access to activities and services. You can do this by writing to the Union Development Officer and University Secretary as set out in the Union’s Bye Laws

If you have any questions please send these to studentsunion@kingston.ac.uk and for further information see the Information Commissioner’s guidance here.

## **Cookies**

Cookies are used on this website for functional, analytical and advertising purposes.

A cookie is a small piece of information which is sent to your browser and stored on your computer’s hard drive. Cookies do not damage your computer, and by themselves cannot be used to discover the identity of the user.

You can set your browser to notify you when you receive a cookie; and you may block cookies by adjusting the settings on your browser. Please note that if you restrict all cookies you may not be able to access all or parts of our website. Unless you have configured your browser to refuse cookies, our system will issue cookies as soon you visit our websites.

### **What is a Cookie?**

Cookies are small files that websites send to your computer when you visit. They enable a website to remember who you are. These cookies store and sometimes track information about your website usage.

Information from cookies may include information relating to your use of our websites; which pages you visited, information about your computer, such as your internet (IP) address; browser type (such as Internet Explorer, Microsoft Edge or Firefox) and geographic data.

### **Third Party Cookies**

Cookies which are used by others are called "Third Party cookies". Third Party Cookies enable third party features or functionality to be provided on or through the website (e.g. like advertising, interactive content and analytics). The parties that set these third-party cookies can then identify your computer both when you visit our website and also when you visit other websites that use the same third-party cookies.

### **Type of Cookies on This Website:**

Advertising and sharing cookies: We use these cookies to make advertising messages more relevant to you. These cookies perform functions such as ensuring that the same advertisement does not continuously appearing. They ensure that advertisements are properly displayed, and in some cases select advertisements that are based on your interests.

### **What Cookies do we use?**

Facebook – Facebook Custom Audiences
Instagram – Instagram Engagement Statistics

### **Ways in which you can Refuse or Control Cookies**

You cannot refuse cookies that are strictly necessary to deliver the website to you. However, you can block or delete strictly necessary cookies and all other cookies by changing your browser settings, as described below. Performing this action may result in some or all features of the website not working as intended.

The "Help" section on the menu bar of most internet browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether.

To find out more about cookies and about using your browser settings to control cookies please visit: [www.allaboutcookies.org](http://www.allaboutcookies.org/).

## **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.

If you have any questions, comments or suggestions, please let us know by contacting marketing@kingston.ac.uk