



## Student Privacy Policy

The OU Students Association is committed to protecting your privacy. This policy will help you to understand how we look after your personal data, and how we make sure that we meet our obligation to you under UK data protection laws. This notice outlines how we will use, store and share your personal data, and supplements any other notices or statements we may provide to you.

In this policy, when we refer to “we”, “us”, “our” this means the Open University Students Association as well as our trading operation, the OU Students Shop, and our associated charity, The Open University Students Educational Trust.

**The policy also applies to the website: [www.oustudents.com] (“Site”).**

### Owner

Open University Students Association.

### Contact us at:

#### Email:

[oustudents-data-protection@open.ac.uk](mailto:oustudents-data-protection@open.ac.uk)

#### Postal address:

OU Students Association  
PO Box 397  
Walton Hall  
Milton Keynes  
MK7 6BE

**Telephone:** 01908 652026

### Services (“Services”).

We enable you to influence how your University is run. We exist to promote your interests, link you to other students, offer opportunities to get involved, help you find information and news, get help, attend events and access support services.

### Use of Your Data

We take data privacy very seriously. We have set out below the different ways we may need to use your data for the delivery of services, and the legal basis for this. We would also like to point out the rights that you have over the way that we use your information. This policy should be read in conjunction with the [Open University’s Data Protection Policy](#).

For the purposes of the UK data protection law which includes but may not be limited to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 as well as any other legislation which is relevant to the jurisdiction in which you reside, we are referred to as the data controller

(the entity which processes your data). All queries relating to this policy and/or data protection more generally should be referred to Dan Moloney the Chief Operating Officer of the Students Association at the above address.

## **Information we collect about you**

The information collected and processed about you might include the following:

### **Personal data (“Personal Data”)**

- First name
- Last name
- Preferred pronoun
- Faculty and Student Support Team
- Registered modules and qualifications where applicable
- Study history
- Expected completion date
- Date of birth
- Email address (for login)
- Address
- Postcode
- Phone number
- Nation (where applicable)
- Geo-location data (your geographical location based on your IP address)
- Personal Identifier Number
- Details of specific webpages visited within the Site and actions taken on those webpages
- Details of devices used to visit/view the Site
- Actions taken within the Site

### **Special category or Sensitive personal data (“Sensitive Personal Data”)**

- Gender
- Racial or ethnic origin
- Politics
- Religious, philosophical or similar beliefs
- Carer status
- Dietary requirements
- Disability status
- Accessibility requirements
- Data concerning a natural person’s physical or mental health or condition.
- Data relating to alleged or actual criminal offences, breaches of codes of conduct or student rules and regulations.

**(hereinafter together, “Data”)**

## **How data about you is collected**

The Data is collected when you sign up and register for an account on the Site, fill in website forms or volunteer application forms, contact us by telephone, email, letter, or when you complete our endorsed surveys or sign up to our email subscription services.

We may add any additional Data that we collect throughout your relationship with us, to your record, for example if you join a student group or sign up to one of our events.

When you become an Open University student, you automatically become part of the Open University Students Association.

When you register with the Open University at [www.open.ac.uk](http://www.open.ac.uk) you agree that the Data collected by Open University can be shared with us, further details of this can be found in their [Student Privacy Notice](#).

You can also read more on their website about [how the Open University uses student data](#).

All Data will be kept private and not shared automatically, unless indicated

## **How we use your personal data (the “Purposes”)**

We may use the Data that you provide for the following purposes:

- 1) To provide news and information by email – using either the Open University’s own email systems, or using data directly collected by us for bespoke newsletters or electronic mailings that you have signed up to on [oustudents.com](http://oustudents.com)
- 2) To facilitate secret ballot, fair and proper elections to appoint student officers and representatives to positions within the Association, as required by Section 22 of the Education Act 1994.
- 3) To process volunteering applications and to facilitate students taking up a voluntary role within the Association.
- 4) To process applications made to the [Open University Students Educational Trust](#).
- 5) To facilitate events that you have agreed to attend which are run by us, the Open University or a collaboration of both.
- 6) To facilitate research to improve our services and the student experience. This may involve our own surveys as well as supporting both Open University and Government-led research projects, including the National Students Survey.
- 7) To verify your identity as an Open University student.
- 8) We process personal data relating to those we employ or engage to work at the Charity. This is for employment purposes to assist in the running of the Charity and to enable individuals to be paid.  
 (“the Purpose(s)”).
- 9) To process expenses claims submitted by you in relation to Association business.
- 10) Accounting and financial planning purposes.
- 11) In order to ensure we comply with our safeguarding duty, for example to verify your identity as part of a Disclosure and Barring Service check if this is a requirement for a volunteer role for which you have applied.

The use of your information for the Purposes is lawful because one or more of the following applies:

- you have given consent to this. Where we rely on your consent or explicit permission for processing the information you give us, this will be brought to your attention at the time the information is collected from you. You may withdraw consent to these uses at any time either by using the opt-out option (where applicable), by emailing us at [oustudents-data-protection@open.ac.uk](mailto:oustudents-data-protection@open.ac.uk) or by writing to us at OU Students Association, PO Box 397, Walton Hall, Milton Keynes MK7 6BE, noting that: (1) this will not affect the lawfulness of processing of your Data prior to your withdrawal of consent being received and actioned; and (2) if we have asked for your consent to a specific part of the service and you wish to withdraw this consent, you may not be able to partake in some of our services if you do so.;
- it is necessary for us to hold and use your Data so that we can perform our obligations under the contract we have entered into with you for the Purpose(s).
- We have a legal obligation to do so.
- To protect your vital interests.
- We have a legitimate interest to do so.
- As a charitable body we have a public interest to do so.

**We we may process your data in our legitimate interest you may object to such processing.**

**(“Lawful Uses”).**

### **Transfer to Third Parties**

We share data with a number of **service provider partners and agents** for the purposes of providing services to us, or directly to you on our behalf. This may include electronic mailing services to provide you with membership news and information; providers of survey and research tools; electoral systems providers to ensure fair and secure student elections; management of event bookings.

When we use third party service providers, we only disclose to them any personal information that is necessary to the provision of their service. We will either have a specific contract in place with the provider or use of your data will be in accordance with their own privacy policies. Further details of these will be available from the provider or within our disclaimer (where applicable), which you will be asked to accept before we are able to share your data. A list of current third-party service providers and agents can be provided upon request to **[oustudents-data-protection@open.ac.uk](mailto:oustudents-data-protection@open.ac.uk)**.

Some contact request forms may forward your Data to third party societies, groups or clubs. Where this is a possibility, the contact request form will clearly say so.

Your personal data may be disclosed to other organisations as required by law, for crime prevention, investigation or detection purposes. We may also share it in an emergency where it is in your vital interests for us to do so.

We undertake regular reviews of who has access to information we hold about you, and we ensure our staff and volunteers are appropriately trained in data protection.

Note: We do not share personal data with Facebook or Twitter, however these tools use pixels and cookies, please see table below for more information.

Your information may also be transferred to another company in the event of the transfer of our assets to a third party. In that event, we will endeavour to ensure that your rights and freedoms in respect of the processing of your personal data are adequately and appropriately protected.

## Use of aggregated data:

Where Data can be aggregated (and anonymised), we may use this without restriction for research purposes (not limited). We are entitled to do this because use of your information for these purposes is for one of the Lawful Uses.

We may also use the Information we gather to notify you about important functionality changes and alterations to the Site, or offer of products, services or information that might be of particular interest to you (where you have consented to this). We ensure that any third parties processing your Data on our behalf protect it as carefully as we do and that they provide an adequate level of protection for your rights as a data subject. This may involve transferring your Data to other companies, inside or outside the UK.

By submitting your Information and subscribing to the Services, you consent to such use and transfer.

Save as provided below, we will not sell, rent, distribute or disclose your Data without your consent or unless required or permitted to do so by law.

## Storage of Data

Your information will be stored only for so long as is reasonably necessary in order to carry out the Purpose(s).

## Your rights

You have the right to request details of the processing activities that we carry out with your personal information through making a subject access request. Such requests have to be made in writing. More detail about how to make a request and the procedure to be followed can be found on the [ICO's website](#).

You also have the following rights:

- The right to request rectification of information that is inaccurate or out of date;
- The right to erasure of your information (known as the “**right to be forgotten**”);
- The right to object to the way in which we are dealing and using your Data;
- The right to restrict the processing of your Data;
- The right to request that your information be provided to you in a format that is secure and suitable for re-use (known as the **right to portability**).

All of these rights are subject to certain safeguards and exemptions, more details of which can be found on the [ICO's webpage](#). To exercise any of these rights, you should contact the Chief Executive at the above address.

If you are not happy about the way in which we have processed or dealt with your information, you may wish to contact our Data Protection Officer whose contact details can be found [here](#); or file a complaint with [Information Commissioners' Office](#).

More detail about how you may do so [can be found here](#).

We have appointed DataRep as the Data Protection Representative to act as a direct contact for members residing in the EU in relation to compliance with the EU GDPR. They have locations in each of the 27 EU countries and Norway and Iceland in the European

Economic Area (EEA). Contact details and more information can be found [here](#).

## **International Transfers of Data**

We may send your information outside of the UK, the EU or other countries that the UK considers adequate for the purposes of data protection. . We do this because your Data may be stored on servers based outside the UK. However, we meet our obligations under the relevant legislation by ensuring that the information has the same protection as if it were being held within the UK. We do this by ensuring that any third parties processing your Data outside the UK [are compliant with our laws. We may undertake a Transfer Risk Assessment in order to establish this.](#) Wherever it is required, we will ensure suitable safeguards are in place to protect your fundamental rights and freedoms. These may include but are not limited to the UK Addendum and the UK International data transfer agreement (IDTA)

## **Security of Your Data**

The Site is a UK-based website and we take reasonable care to comply with the requirements of UK data protection law relating to the personal information you supply on the Site. The Site uses a security system that protects your information from unauthorised use. However, as no data transmissions over the internet can be guaranteed to be one hundred percent secure, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk.

## **Updating your Information**

If any of the information you provide when subscribing to the services on the Site changes, please update your profile by logging in or alternatively, please notify [oustudents-data-protection@open.ac.uk](mailto:oustudents-data-protection@open.ac.uk).

## **Accessing your Information**

We are data controllers for the purposes of the Act and if you wish to request access to your Information held by us, you may contact [\*\*oustudents-data-protection@open.ac.uk\*\*](mailto:oustudents-data-protection@open.ac.uk).

## **Mailing Lists**

If you subscribe to our mailing lists for news releases and other information, we may also ask you to answer various general questions about yourself. You will be asked to specify the areas in which you are interested so that we can tailor the information which we send to you to cover the new products and special offers which we believe you might be interested in.

## **Newsletters**

If you subscribe to one of our newsletters and at any time you wish to stop receiving this or any other information you may have requested from us or any other company, please email [\*\*oustudents-data-protection@open.ac.uk\*\*](mailto:oustudents-data-protection@open.ac.uk) or click the Unsubscribe link at the bottom of any communication you may receive from us.

## **Surveys and user groups**

We always aim to improve the services we offer. As a result, we canvass our members using third party survey tools. Participation in surveys is voluntary, and you are under no obligation to reply to any survey you might receive from us. Should you choose to do so, we will treat

the information you provide with the same high standard of care as all other member information.

## **Competitions**

Your participation on our Site may mean that we occasionally contact you with the opportunity to enter competitions. Entry to competitions is voluntary, and you are under no obligation to take up an invitation from us to enter. Should you choose to enter a competition, we will treat the information you provide with the same high standard of care as all other member information, and use the information provided strictly within the entry terms of the competition and this Privacy Policy.

## **Links to third parties' sites**

Please note that we may provide links to other sites, which may not be governed by this Privacy Policy and you should view the privacy policy of those sites for further information.

## **Traffic Patterns/Site Statistics**

We may monitor member traffic patterns, Site usage and related Site information in order to optimise your use of the Site and we may give aggregated statistics to a reputable third-party, but these statistics will include no information personally identifying you.

## **Cookies**

In addition to the Information which you supply to us, information and data may be automatically collected through the use of cookies. Cookies are small text files the Site can use to recognise repeat users and allow us to observe behaviour and compile aggregate data in order to improve the Site for you. For example, cookies will tell us whether you viewed the Site with sound or with text on your last visit. Cookies also allow us to count the number of unique and return visitors to our Site. Some of our associated companies may themselves use cookies on their own websites. We have no access to, or control of these cookies, should this occur.

Cookies may be either “persistent” cookies or “session” cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

The law states that we can store cookies on your machine if they are essential to the operation of the Site, but that for all others we need your permission to do so.

**Targeted Advertising** - We and third parties may serve you with targeted advertisements through the use of first-party or third-party cookies, pixels and web beacons when you visit our website or visit third party websites. In some instances, these cookies may be persistent cookies. We and our third party service providers may also use cookie and other information to try to identify other devices and web browsers that you may use so we and our third-party service providers may serve targeted advertisements to those devices. We do this to provide you with advertising that we believe may be relevant for you as well as to improve our own products and services, including the functionality and performance of our website. To learn more about opting out of certain types of targeted advertising, please see the “Opting out of cookies” section below.

The list below explains the cookies we use and why:

Cookie Description	Name	Purpose
<p><a href="#">Google Analytics</a> cookies, set a first-party cookie in order to anonymously identify when users return to a website.</p>	<p>View the full list of cookie names on the <a href="#">Google Analytics</a> website.</p>	<p>Non-essential cookie to help us track site usage and make improvements to user experience.</p>
<p><b>Gravit-e cookie – user session</b></p>	<p>PHPSESSID</p>	<p>Essential cookie which identifies the user's session. It expires at the end of the session</p>
<p><b>Gravit-e cookie</b></p>	<p>eu_cookie_consent_continued</p>	<p>Non-essential cookie which sets when the user accepts cookies. It hides the cookie warning and expires in one year.</p>
<p><b>Twitter cookies (in conjunction with Twitter's <a href="#">Tailored audiences</a>)</b></p>	<p>Full details of Twitter's cookie usage is available on <a href="#">their website</a>.</p>	<p>Cookies from Twitter users are used and matched to the cookie IDs of our website visitors to gather analytics and create targeted advertising campaigns to these recent website visitors.</p>
<p><b>Facebook Javascript (in conjunction with <a href="#">Facebook Pixel</a>)</b></p>	<p>Although not strictly a cookie, the Facebook pixel uses Javascript code to track activity. You can find out more about the <a href="#">pixel on the Facebook website</a>. To change your settings on what advert you see via the Facebook pixel, <a href="#">please visit this page</a>.</p>	<p>IDs from Facebook users are used and matched to the IDs of our website visitors to gather analytics and create targeted advertising campaigns to these recent website visitors.</p>
<p><b>Google cookies when viewing embedded YouTube videos on our site</b></p>	<p>Full details of cookie names are on the <a href="#">Google website</a>.</p>	<p>Google may place cookies to show users relevant adverts on their platforms and across the web and record the videos users have watched.</p>



<p><b>Soundcloud cookies when listening to a podcast embedded on our website.</b></p>	<p>For full details of cookie names are on the <a href="#">Soundcloud website</a>.</p>	<p>These cookies recognise users when they visit our website or use Soundcloud apps. This means that users don't have to log in each time you visit, and we can remember preferences and settings.</p>
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If you do not wish to receive cookies from us or any other website, you can turn cookies off on your web browser: please follow your browser provider's instructions in order to do so. Unfortunately, we cannot accept liability for any malfunctioning of your PC or its installed web browser as a result of any attempt to turn off cookies.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org), [www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.civicuk.com/cookie-control/browser-settings](http://www.civicuk.com/cookie-control/browser-settings).

It is important to remember that our Site and/or use of our Services may not function properly if your cookies are disabled. For example, if we begin to tailor the content to your interests as expressed by your browsing behaviour this depends on cookies. If you have declined cookies then this kind of service will not be available to you.

### **Amendments to this Privacy Policy**

We may occasionally make modifications to this Privacy Policy ("Variations") and, if the Variations are significant, will endeavour to give you prior notification (including, for certain services, email notification of Privacy Policy Variations). Variations become effective immediately upon posting to the Site and by continuing to use the Site, you will be deemed to accept any such Variations.

We also keep prior versions of the Privacy Policy in an archive, which are available for you to review upon email request to us at [oustudents-data-protection@open.ac.uk](mailto:oustudents-data-protection@open.ac.uk).

*Privacy Policy, version [2.8] (updated August 2022)*