

How we use public and third party data at DMU

Introduction

De Montfort University (DMU) processes your personal data securely and we comply with current data protection and privacy laws. All our staff who have access to your personal data understand their responsibilities for keeping your information secure and maintaining your confidentiality.

Personal data is information from which a person can be identified, either directly or indirectly. DMU is the 'Data Controller' for the personal data that we process. This means that we determine the purpose(s) of the processing. By law, we have to tell you from who or where we collect your personal data from, how we may use your personal data and for what purpose(s), who we may share it with and how long we retain it for. We will process only the minimum personal data needed for each purpose and hold it only for as long as set out in the DMU Retention Policy.

For each purpose that we process your personal information, we must have a lawful basis to do so.

Sensitive personal data is called 'special category data'. Special category data is data about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health, sex life, sexual orientation or criminal convictions. Where the DMU processes special category data, as well as meeting a general processing condition, we must also rely on a special category condition to lawfully process the data.

Depending on the lawful basis for the processing, you may have a right to object to the processing, to restrict how we process your personal data. You also have a right to request access to the personal data we hold about you.

If you want to know more or if you have a complaint about how your personal data is processed by DMU, please contact our Data Protection Officer at: dpo@dmu.ac.uk

Below are the conditions that we rely upon as the lawful bases to process public and third party personal data.

LAWFUL BASIS FOR PROCESSING: CONSENT

- Consent means that you have made an informed decision that you understand how your data is to be used by DMU and wish to permit that processing to take place.
- Consent should be obvious and require a positive action to opt in, for example, ticking a box.
- Consents must be easy to understand and separate from other terms and conditions.
- Consents must be for clearly specified purposes, and a separate consent must be collected for any additional uses of that data.
- Where processing takes place on the basis of consent, DMU must also provide the opportunity for you to withdraw that consent. If you wish to withdraw your consent for processing to take place, you may use the procedure documented here: <http://www.dmu.ac.uk/data-protection/>

Use of Data	Categories of personal data	Categories of special category data	Lawful basis for processing special category data	Any recipient or categories of recipients of the personal data	Details of transfers to third country and safeguards	Retention period or criteria used to determine the retention period	The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.
<p>Alumni activities relating to communications for interested third parties for the purposes of (and not limited to):</p> <ul style="list-style-type: none"> - Newsletters - Data update requests - Surveys - Competitions - Opportunities - Alumni clubs - Alumni ambassadors - Event invitations - Philanthropic appeals 	<p><i>[Including and not limited to]</i></p> <ul style="list-style-type: none"> • Name • Date of Birth • Contact Information • Course Information • Attainment • Online identifiers 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> • Profiling by automatic means may be used to enable marketing to be targeted to specific audiences.
<p>Processing third party data in relation to Alumni activities in order for DMU to carry out its function as a University, which includes (and is not limited to) procedures related to the following tasks:</p> <ul style="list-style-type: none"> - Events - Competitions - General Alumni Activities 	<ul style="list-style-type: none"> • Name • Date of Birth • Contact Information • Course Information • Attainment • Online identifiers 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> • Profiling by automatic means may be used to enable marketing to be targeted to specific audiences.

Alumni activities relating to processing philanthropic support from third parties which includes and is not limited to: - Processing financial information - Creation and management of pledges - Gift Aid Claims from HMRC	<ul style="list-style-type: none"> Name Date of Birth Contact Information Course Information Attainment Online identifiers Financial Information 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> HMRC 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> None
Processing data from webpage access	<ul style="list-style-type: none"> Online identifiers 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> N/A 	<i>[Including and not limited to]</i> <ul style="list-style-type: none"> Third party analytics (cookies) 	<ul style="list-style-type: none"> Yes 	<ul style="list-style-type: none"> In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> Profiling by automatic means may be used to enable marketing to be targeted to specific audiences.

LAWFUL BASIS FOR PROCESSING: NECESSARY FOR A CONTRACT

- The processing is necessary for a contract DMU has with you, or because we have asked you to take specific steps before entering into a contract.
- We can rely on this lawful basis if we need to process your personal data to fulfil our contractual obligations to you; or because you have asked us to do something before entering into a contract (e.g. provide a prospectus or send you a job application pack).

Use of Data	Categories of personal data	Categories of special category data	Lawful basis for processing special category data	Any recipient or categories of recipients of the personal data	Details of transfers to third country and safeguards	Retention period or criteria used to determine the retention period	The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.
The administration of residential services and room hire to third parties, including [and not limited to] monitoring of service uptake and provision.	<ul style="list-style-type: none"> Name Date of Birth Contact details Financial information 	<ul style="list-style-type: none"> Disability Health 	<ul style="list-style-type: none"> Explicit consent 	<ul style="list-style-type: none"> Third party provider of the residential service 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> None
Participation in the DMU Global programme	<ul style="list-style-type: none"> Name Date of Birth Contact Details Financial Information Passport and Visa Information Online identifiers 	<ul style="list-style-type: none"> Disability Health 	<ul style="list-style-type: none"> Explicit consent 	<i>[Including and not limited to]</i> <ul style="list-style-type: none"> Transport providers, including airlines Accommodation Providers Non EU Governmental Departments for VISAs 	<ul style="list-style-type: none"> To the country which the individual is to be visiting 	<ul style="list-style-type: none"> In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> None

LAWFUL BASIS FOR PROCESSING: LEGITIMATE INTEREST

- The processing is necessary for DMU's legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests.
- The legitimate interests can be DMU's interests or the interests of third parties. They can include commercial interests, individual interests or broader societal benefits.
- This cannot apply when DMU is acting as a public authority processing data to perform its official tasks (see Legal Basis: Statute below).

Use of Data	Categories of personal data	Categories of special category data	Lawful basis for processing special category data	Any recipient or categories of recipients of the personal data	Details of transfers to third country and safeguards	Retention period or criteria used to determine the retention period	The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.
Voluntary activity in relation to sustainability projects at DMU	<i>[Including and not limited to]</i> <ul style="list-style-type: none"> • Name • Contact Details 	<ul style="list-style-type: none"> • Disability • Health 	<ul style="list-style-type: none"> • Explicit consent 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> • None
Purposes for administration and running of the QEII Leisure Centre.	<i>[Including and not limited to]</i> <ul style="list-style-type: none"> • Name • Date of Birth • Contact Details • Financial Information 	<ul style="list-style-type: none"> • Disability • Health 	<ul style="list-style-type: none"> • Explicit consent 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> • None
Provision of library services to members of the public	<i>[Including and not limited to]</i> <ul style="list-style-type: none"> • Name • Date of Birth • Contact Details • Financial Information • Online identifiers 	<ul style="list-style-type: none"> • Disability • Health 	<ul style="list-style-type: none"> • Explicit consent 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> • None

LAWFUL BASIS FOR PROCESSING: PUBLIC TASK

- The processing is necessary for DMU to perform a task in the public interest to enable DMU to carry out its official functions, and the task or function has a clear basis in law.

Use of Data	Categories of personal data	Categories of special category data	Lawful basis for processing special category data	Any recipient or categories of recipients of the personal data	Details of transfers to third country and safeguards	Retention period or criteria used to determine the retention period	The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.
<p>Processing third party data in order for DMU to carry out its function as a University, which includes (and is not limited to) procedures related to the following tasks:</p> <ul style="list-style-type: none"> - Admissions - Clearing - Enrolment - Communication of information relating to the University - Attendance Monitoring - Course Fees - Student finances - General administration during the student life cycle - Examinations - Issuing awards upon Progression - Provision of Library Services - Participation in the Higher Education Achievement Record - Participation in the Higher Education Degree Data check - Student (prospective, current and former) placements or career opportunities 	<p><i>[Including and not limited to]</i></p> <ul style="list-style-type: none"> Name Date of Birth Contact Details Financial Information Online identifiers 	<ul style="list-style-type: none"> Health Disability 	<ul style="list-style-type: none"> Explicit Consent 	<p><i>[Includes and not limited to]</i></p> <ul style="list-style-type: none"> DSU (subject to individuals consent) Student Finance England HEAR HEDD Examination Bodies OFSTED SCONUL 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> None

Activities related to correspondence between a third party and DMU in relation to DMU carrying out an official function.	<i>[Including and not limited to]</i> <ul style="list-style-type: none"> Name Contact Details Online identifiers 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> None
Provision of library services to members of the SCONUL scheme	<i>[Including and not limited to]</i> <ul style="list-style-type: none"> Name Contact Details Details pertaining to their University or other establishment Online identifiers 	<ul style="list-style-type: none"> Disability Health 	<ul style="list-style-type: none"> Explicit consent 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> None

LAWFUL BASIS FOR PROCESSING: LEGAL OBLIGATION

- DMU can rely on this lawful basis if we need to process your personal data to comply with a common law or statutory obligation.

Use of Data	Categories of personal data	Categories of special category data	Lawful basis for processing special category data	Any recipient or categories of recipients of the personal data	Details of transfers to third country and safeguards	Retention period or criteria used to determine the retention period	The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.	The specific legal provision or an appropriate source of advice or guidance that clearly sets out DMU's obligation to process the data.
Processing gift aid claims in relation to third party philanthropic support	<ul style="list-style-type: none"> Name Date of Birth Contact Information Financial Information 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> HMRC 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> HMRC

<p>Any disclosures to third parties required by law, including and not limited to:</p> <ul style="list-style-type: none"> - Higher Education Statistics Agency - Higher Education Funding Council - Office for Students - Police - HM Revenue & Customs - Local Authorities - UK Visas and Immigration 	<p><i>[Including and not limited to]</i></p> <ul style="list-style-type: none"> • Name • Date of Birth • Contact Information 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • N/A 	<p><i>[Including and not limited to]</i></p> <ul style="list-style-type: none"> • Higher Education Statistics Agency • Higher Education Funding Council • Office for Students • Police • HM Revenue & Customs • Local Authorities • UK Visas and Immigration 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • Statute • Common Law
<p>Processing the monthly payroll where payments to third parties are required.</p>	<p><i>[Including and not limited to]</i></p> <ul style="list-style-type: none"> • Name • Contact Details • Financial Information 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • N/A 	<p><i>[Including and not limited to]</i></p> <ul style="list-style-type: none"> • HMRC - legal obligations • Leicestershire LGPS - legal obligations of scheme/employer • TPS - legal obligations of scheme/employer • USS - legal obligations of scheme/employer • Aviva - legal obligations of scheme/employer • Various government departments - legal obligations 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • Statutory Requirements – HMRC • Statutory Requirements – Pensions Regulator
<p>Accident and incident reporting.</p>	<ul style="list-style-type: none"> • Name • Contact details • Date of birth • Job Role • Department • Salary • Employment History 	<ul style="list-style-type: none"> • Health • Disability 	<ul style="list-style-type: none"> • Employment 	<ul style="list-style-type: none"> • Health & Safety Executive 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • In accordance with the DMU Retention Policy 	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • Statutory Requirement

LAWFUL BASIS FOR PROCESSING: VITAL INTERESTS OF THE DATA SUBJECT OR ANOTHER NATURAL PERSON

- DMU is likely to be able to rely on vital interests as its lawful basis if we need to process the personal data to protect someone's life.
- You cannot rely on vital interests for health data or other special category data if the individual is capable of giving consent, even if they refuse their consent.

Use of Data	Categories of personal data	Categories of special category data	Lawful basis for processing special category data	Any recipient or categories of recipients of the personal data	Details of transfers to third country and safeguards	Retention period or criteria used to determine the retention period	The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A