

## Student spotlight emails: Full privacy notice

The General Data Protection Regulation (GDPR) requires that clear and transparent information is provided to individuals about the use(s) that will be made of their personal information:

*“The principle of transparency requires that any information and communication relating to the processing of those personal data be easily accessible and easy to understand, and that clear and plain language be used.”* (GDPR Recital 39)

To fulfil this obligation, we are employing a layered approach to privacy notices where a short form overview is provided at the point at which personal data is collected, with a link then provided to a full detailed privacy notice.

### Summary

Here is a short summary of how the personal information you submit will be held and used:

- Your personal information (your email address and any additional information you submit) will be used to send you emails about news and events run by the Office for Students.
- The Data Controller of the personal information you submit will be Office for Students.
- The legal basis for processing your personal information is your consent.
- It will be stored on secure servers within the United Kingdom and on MailChimp servers based in the USA.
- OfS use MailChimp as our marketing platform. Your personal data will be shared with MailChimp for processing in accordance with their privacy policy: <https://mailchimp.com/legal/privacy/> so please only submit information which you happy to have processed by MailChimp.
- It will be retained for as long as you are subscribed to the news alerts. Your personal information will be securely disposed of if you unsubscribe from receiving news alerts.
- You have certain rights in relation to your personal information, which are set out at: <https://ico.org.uk/your-data-matters/>
- You may contact our Data Protection Officer (dp@officeforstudents.org.uk) with any queries or concerns you have about the use of your personal information.

You may also wish to read the full privacy notice below.

# Full privacy notice

This full privacy notice explains in more detail how the personal information you submit in order to receive news alerts and opportunities will be held and used.

## 1. Introduction

The Office for Students (“OfS”) is the regulator of the higher education sector in England and has certain statutory functions set out in the Higher Education and Research Act 2017. You can find more information about OfS and the work that we do on our website: [www.officeforstudents.org.uk](http://www.officeforstudents.org.uk)

As the regulator of higher education within England, OfS aims to keep students up-to-date with the latest news at the OfS and opportunities about how to get involved in our work. To receive this information, individuals can register to receive ‘news alerts’ via email by registering their details on the OfS website: <https://www.officeforstudents.org.uk/sign-up-for-email-alerts>. This webpage also includes additional questions about you and you can choose whether or not to provide this information.

In accordance with the Privacy and Electronic Communications Regulations (PECR) and the General Data Protection Regulation (GDPR), subscribers can ‘opt-in’ to receiving these emails. The OfS uses MailChimp for their marketing platform and any data submitted will also be received by MailChimp and processed in accordance with their privacy policy: <https://mailchimp.com/legal/privacy/> so please only submit information which you happy to have processed by MailChimp.

OfS is committed to protecting your personal information and being clear about what information we hold about you and how we use it. This privacy notice tells you what to expect when the OfS collects personal information that subscribers submit on the ‘OfS news alerts’ webpage.

OfS is registered with the Information Commissioner’s Office (ICO). Our registration number is ZA309955 and you can check our entry details on the ICO’s website: <https://ico.org.uk/about-the-ico/what-we-do/register-of-fee-payers/>

## 2. Data controller and Data Protection Officer

OfS is the “data controller” of any personal information collected within scope of this privacy notice. Our location and contact details are below:

Office for Students

Nicholson House

Lime Kiln Close

Bristol

BS34 8SR

Tel: 0117 931 7270

Email: [dp@officeforstudents.org.uk](mailto:dp@officeforstudents.org.uk)

Our Data Protection Officer (DPO) is the first point of contact for people whose information is processed. You can contact the DPO using the details above.

## 3. How we will use your information

We can only use your personal information where we have a specific purpose or purposes for doing so.

As the independent regulator of the higher education sector in England, the OfS aims to ensure that individuals are kept up-to-date with OfS news and opportunities to get involved with our work.

To achieve the above aims, the specific uses that will be made of your personal information are listed below:

- To keep a database of subscribers to the OfS news alerts service, including records of consent given.
- With your consent, to use the personal information submitted via the 'news alerts' webpage to send emails about news and opportunities at the OfS.
- To use the personal information submitted to understand the groups of subscribers who are registering for news alerts.
- With your consent, to send more tailored emails based on the information you have submitted on the 'news alerts' webpage.

If we want to use your personal information for a reason other than those purposes set out above, we will tell you before we start that use and provide further information about the new purpose(s).

## **4. Legal basis for using your personal information**

Under data protection legislation, we require a legal basis to be able to process your personal information for the purposes set out above.

In this case, the legal basis is:

- Subscribers' consent to process their personal information for the purposes specified [GDPR Article 6(1)(a)].

### **Withdrawal of consent**

Consent must be a clear positive action that you have given your agreement to the use of your personal information, and you can give your consent by ticking the relevant boxes on the 'OfS news alerts' webpage.

You can withdraw your consent at any point if you are no longer happy for your personal information to be processed. If you wish to withdraw consent, please do so by clicking 'unsubscribe' link on the bottom of any 'news alert' email you receive.

Alternatively, you can withdraw your consent by writing to:

Data Protection Officer

Office for Students

Nicholson House

Lime Kiln Close

Bristol

BS34 8SR

Email address: [dp@officeforstudents.org.uk](mailto:dp@officeforstudents.org.uk)

Once consent is withdrawn, we will destroy all relevant personal information. However, withdrawing your consent does not affect the lawfulness of personal information processed before you withdrew consent.

## 5. What personal information we will collect

The personal information we will collect and use is set out below:

- Your email address
- If submitted, whether you are a student, graduate, student's union Officer, a students' union employee, a graduate or from another demographic)
- If submitted, where you are currently based.

If you do not wish to submit the information about who you are or where you are based, there is an option to choose 'Prefer not to say'.

## 6. Who we give your personal information to

OfS use the MailChimp platform to manage our news alerts and marketing. Any personal data submitted when signing up for news alerts will be transferred to MailChimp and processed by them in accordance with their own privacy policy: <https://mailchimp.com/legal/privacy/>

When you subscribe to email alerts, Mailchimp will be able to view data about when you subscribed, as well as device information, such as IP addresses.

## 7. Where your personal information will be stored

Your personal information held by the OfS will be stored securely within the United Kingdom.

MailChimp is based within the United States and so your personal information will also be stored on servers in United States. Because this means your information will be held outside the UK / EEA, we have assessed the risks with storing your personal information the United States and are satisfied that it will not be put at any undue risk as a result. The reasons for this are included below:

- In their Data Processing Addendum, MailChimp confirm that they have agreed to be bound by standard contractual clauses put in place by the European Commission. These clauses provide organisations based in the USA with a way of showing they provide adequate protection to personal information transferred from the UK.
- Mailchimp provide a copy of the standard contractual clauses within their Data Processing Addendum, available on their website: <https://mailchimp.com/legal/data-processing-addendum/>
- We have carried out our own assessment of the organisation's security and data protection provisions and are satisfied they have appropriate measures in place to protect your personal information.

## 8. How do we protect your personal information

OfS has a number of security measures in place to protect your personal information, listed below:

- Accredited to the Cyber Essentials PLUS standard for cyber security
- All staff are required to undertake training in data protection and information security on joining OfS and then on an annual basis;
- Formal information security policies that must be read and understood by all staff;

- Personal information is only available to those members of staff who require access as part of their role.
- MailChimp state in their privacy policy that they adhere to standard contractual data protection clauses in order to protect subscribers' information.
- MailChimp also state that they use encryption to protect subscribers' information. A description of their additional security measures can be found within Annex C of their Data Processing Addendum.

## 9. Your rights over your personal information

Once your personal information has been collected, you have certain rights in relation to that personal information that may be exercised. You have the right to request:

- A copy of your personal information;
- Inaccurate personal information held about you is corrected;
- Your personal information to be deleted;
- Processing of your personal information is restricted;
- A copy of your information in a format that allows easy transfer ("data portability");
- That you are not subject to automated decision making or profiling (if these take place).

All these rights have certain limitations depending on the request and the purpose for which we are holding your personal information. Further information can be found about these rights and our processes for handling such requests at:

<https://www.officeforstudents.org.uk/privacy/individual-rights-under-the-general-data-protection-regulation/>

## 10. How long we will hold your personal information

We are only able to retain a copy of your personal information as long as it is still needed for the purpose(s) for which it was collected. The personal information you have submitted will be kept for as long as you are subscribed to the news alerts. Your personal information will be securely disposed of if you unsubscribe from receiving news alerts.

When you sign up for news alerts, your personal information will also be retained in accordance with MailChimp's privacy policy: <https://mailchimp.com/legal/privacy/>

## 11. Use of cookies on OfS website

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to complete statistical reports on website activity. For further information about our cookies visit: <https://www.officeforstudents.org.uk/cookies/> or for further general information visit: [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 12. Complaints about the use of your personal information

If you are unhappy with the way in which your personal information has been handled by OfS, please contact us via our Data Protection Officer (details in section 2) and we will try to resolve your issue informally.

If we are not able to resolve the issue to your satisfaction, you can also make a complaint to the data protection supervisory authority. In the UK, this is the Information Commissioner's Office (ICO) and they can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

### **13. Changes to this notice**

We keep our privacy notices under regular review and we will inform you of any changes to this notice by placing an update on our website.

This privacy notice was last updated in June 2021.