

GLASGOW CALEDONIAN UNIVERSITY VISITOR AND PUBLIC PRIVACY NOTICE

1. Introduction

Glasgow Caledonian University (GCU) is a Data Controller in terms of Data Protection Legislation. GCU is registered with the Information Commissioner's Office, our Registration Number is Z5761620.

GCU may process and retain certain information relating to you by virtue of visiting or entering premises owned or controlled by the University or by you contacting us by telephone, email or letter. Additionally, your personal data may be processed if you are photographed, filmed or audio recorded. All of your personal information will be treated in accordance with data protection law including the Data Protection Act and the UK General Data Protection Regulation.

The purpose of this statement is to inform visitors and members of the public how their personal information will be used by the University.

2. Purpose of this Privacy Notice

This Privacy Notice sets out the University's responsibilities and obligations as a Data Controller – The organisation responsible for protecting your personal data. In addition it:

- Explains the legal basis relied on when using your personal data;
- Provides an overview of the purposes for which your personal data will be used;
- Explains the sources of the information which we hold;
- Sets out the types of information which are used;
- Informs you who has access to your personal data and the limited conditions under which your personal data may be shared with a third party;
- Explains your privacy rights and the steps you can take to exercise these; and
- Explains how the University will protect your personal data, keeping this safe and secure.

3. Compliance with the data protection principles

We will comply with data protection law. This says that the personal data we hold about you must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

4. Legal basis for processing your information

Depending on how you interact with the University, we will rely upon the most relevant legal basis to process your information. Most commonly, we will process information about you for the following reasons:

- You have provided your consent
- Performance of a contract we have with you.
- To perform a task in the public interest.
- Compliance with legal, regulatory and corporate governance obligations and good practice.
- For the purpose of our legitimate interests but only where these are not overridden by your interests, rights or freedoms.

5. Why we use your personal information?

The purpose of processing your information includes, but is not limited to:

- To provide you with information when you make an enquiry.
- To record a photograph, film or audio recording of you
- To communicate with you if you complain to us.
- To send you information about the University which you request from us.
- To register you as a visitor to our premises.
- To ensure your health and safety when on our premises.
- To keep our premises secure.
- To prevent crime and for public safety, including through the use of CCTV.
- To report any incidents on our premises to the relevant authorities.
- To allow us to establish or defend a legal claim.

6. Sources of information

The personal information GCU holds about you is obtained from a number of sources including the following:

- Personal data provided by you in person, by letter, by telephone or by email when making enquiries or providing the University with feedback.
- Personal data built up about you during your correspondence and communication with the University for the purposes above.
- Recording, films or photographs.
- University CCTV systems.

7. Types of information that we use

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The University may hold personal information relating to you including but not limited to your name, data of birth, address, telephone number, email addresses, qualifications and skills.

8. Special categories of personal information

We do not actively collect any Special Categories of Personal Data about you (this includes details racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, data concerning health or data

concerning sex life or sexual orientation). We will only process special category data about you if you provide it to us.

9. Sharing information with other people

The University will manage your personal data securely and will restrict access to employees, advisors, agents, contractors and service providers, who will only process information in accordance with data protection legislation and the University's instructions. The University will put in place technical and organisational measures necessary to ensure the security of your information.

The University may share your personal data with the following third parties for the purposes stated above:

- Police and other law enforcement bodies
- Contractors working on our premises on our behalf
- The emergency services

The University will only disclose your information to third parties where we:

- Have your consent; or
- Are required to under a statutory or regulatory obligation; or
- Are permitted to do so under the data protection legislation.

10. Protecting your Information

The University puts in place a series of technical and organisational measures to protect and safeguard all the information that it holds. For example, data is securely stored in dedicated data centres, where appropriate data and devices are encrypted, staff receive training and briefings on information security and data handling. The effectiveness of those measures is routinely reviewed by University Court (through the Audit Committee) and through internal audit.

11. Where your information is held?

Your personal data will be held in the UK and in certain circumstances, information may be transferred outside the European Economic Area (EEA), to countries which may not have equivalent data protection laws. Examples of circumstances when personal data may be transferred outside the EU include:

- Information posted on our website which is accessible outside the EEA.
- Some of the systems and services the University uses to store data in the "Cloud" which may include storage facilities based outside the EEA.
- Where you are located or reside outside the EEA

When information is transferred outside the EEA, the University will ensure that appropriate safeguards are in place.

12. CCTV

The University's premises are monitored by CCTV systems for the purposes of public safety and the prevention and detection of crime. CCTV footage may also be used for investigations or proceedings arising under the University's regulations, codes and policies. Our CCTV Policy is published here: <https://www.gcu.ac.uk/student/life/yourcampus/campussecurity/>

13. Retention of your Personal Information

GCU will retain your personal data only as long as necessary for its purposes as described. Please note, however, that even after termination of your involvement with the University, GCU may still need to retain your personal data to meet its obligations to keep certain records for particular periods under applicable law. We also keep a limited permanent record of you being a student for archival purposes. The University's Records Retention Schedule can be found on our website at: <http://www.gcu.ac.uk/recordsmgmt/documents/>.

14. Making sure your Personal Information is Accurate

GCU strives to ensure that all personal data remain current and accurate. If you become aware of any incorrect information held by the University, you have the right to request that this is rectified. There are particular areas where the University relies upon you to inform it of any changes to your personal data; for example contact and emergency contact details.

15. Rights of access, correction, erasure and restriction

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes.

Under certain circumstances, by law you have the right to:

- **Right to be informed** about the collection and use of your personal data
- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request the restriction of processing of your personal data.** This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

16. Data Protection Contact Details and Further Information

We will publish any changes we make to our Data Protection Policy on our website: <http://www.gcu.ac.uk/dataprotection/>

If you are not happy with your personal information being processed as described above, please contact the University's Data Protection Officer (DPO). You can do this by:

Email: dataprotection@gcu.ac.uk
Telephone: 0141 331 8392
Post: Department of Governance & Legal Services
Glasgow Caledonian University
Cowcaddens Road
Glasgow
G4 0BA

If you are dissatisfied with the response from the University, you have the right to lodge a complaint with the Information Commissioner's Office:

Post: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Email: casework@ico.org.uk
Telephone: 0303 123 1113