

## **Events Privacy Notice**

This Notice is for people who have been invited to, or who attend WGU events which are open to the public.

Please see the contents list below for the information contained in each section of this Privacy Notice.

If you have any questions or concerns about this Notice, or any queries or comments on the processing described in this Notice, please contact the WGU Data Protection Officer (DPO):

Email: [dpo@glyndwr.ac.uk](mailto:dpo@glyndwr.ac.uk)    Tel: 01978 01979 293995    Address: Plas Coch, Mold Road  
Wrexham LL11 2AW

In this Notice, “WGU”, “we”, “our” and “us” refers to Glyndŵr University.

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### **1. Introduction**

As a result of your engagement with WGU we will hold your “personal data” i.e. information in a form that identifies you as an individual [often referred to as “data” in this notice]. WGU is the data controller of the information it collects and processes as described in this Notice. This means that it has the core legal responsibility to safeguard the information and ensure it is processed lawfully. The law is set out in the UK General Data Protection Regulation (called “UK GDPR”) and the Data Protection Act 2018. In particular, WGU must:

- Take steps to ensure that the data it processes is accurate and up to date;
- Give you clear information about its processing of your data, in one or more Privacy Notices like this one;
- Only process your data for specific purposes described to you in a Privacy Notice, and only share your data with third parties as provided for in a Privacy Notice; and
- Keep your data secure.

**Information about your data protection rights as a data subject is set out in section 9 of this Notice.**

### **2. How your personal data is collected**

WGU collects your personal data from the following sources:

- Completed forms in relation to attending or participating in an event, including buying or registering for tickets online;

- Attendance or participation in an event for example, graduation, courses, hire of function room or on site pitches;
- Interaction with one of our representatives or employees during an event, for example when you sign up to a mailing list or enter a competition;
- Communication with us by post, email, online chat, social media, telephone or another format;
- Visiting WGU website including when you search, register or use online portals or sign up for an event;
- As a student who is eligible for invitation to graduation.

### **3. What categories of personal data are collected**

We collect the following categories of personal data:

#### Identification, background and contact details

- Biographical information such as your name, title, gender and date of birth;
- Your image, audio and likeness (as captured on a webinar, in photographs or on recordings we make of the event, and on CCTV where the event is hosted at our premises);
- Your contact details including work and/or home address, email address, online chat or social media account details and phone number;
- Your qualifications, professional experience and institution or employer (where this is relevant to the event);
- Your student clubs or societies, affiliations and other connections with WGU (for example where this is relevant to Alumni Events);
- Information about your school, educational background, and family financial information (such as family income) where this is relevant for selecting participants for an event and deciding whether you are eligible to participate in particular events

#### Online and transactional

- Details of your IP address, browser type and operating system when you visit our website;
- Events that you have attended in the past or for which you are registered to attend in the future;
- Payment details and your financial transactions in relation to events;
- Records of communication sent to you by the University or received from you.

We may also collect the following special categories of personal data where it is necessary for the purposes set out in this Notice:

- Information concerning your health and medical conditions (i.e. disability and dietary needs);
- Trade union membership number for example where membership provides you with access to or a discount on an event;
- Criminal acts caught on our CCTV or Body Worn cameras (BWC's); and
- Diversity information about your racial or ethnic origin, religion or similar beliefs and sexual orientation.

### Photographing or filming our events

We often take photographs or films at events that we host, so that we can use them for marketing purposes which may include public display and distribution of the images. If we record images of you at one of our events, these images may be used in one or more of the following ways:

- Prospectuses and other university promotional materials
- As part of an advert or advertisement feature (which includes possible use on outdoor media such as buses and billboards)
- On our website or intranet
- In promotional videos created by the university

If you are attending one of our events and you do not want your image to be used then you can simply ask us not to. You should let the photographer or a member of staff know. You are also advised to attempt to stay out of any shots or footage being taken, as you may appear in the background in error.

This information is kept in the University's databases and is restricted to those who are permitted to access these databases. Personal data may, in some circumstances be entered into Customer Relationship Management Systems.

### Graduation

Information is collected and processed in different ways for graduation purposes. This section is for students of WGU only.

It is necessary for the University to process your personal data in order to ensure that:

- You are invited to your graduation ceremony;
- You are able to book tickets;
- Your name appears on the Graduation ceremony programme;
- You have an opportunity to feedback on your graduation experience; and
- We are able to respond to any questions you may have related to your ceremony, and forward your queries to another department if it's not graduation related

We collect data from your student record held on the University database. This includes your name, email address, student ID number and additional supplementary information you provide to us in acceptance of your graduation invitation. Whether attending or not attending a ceremony, your name subject area and award title (not classification) will be included in the University's graduation ceremony programme. Names of graduates are also published in local newspaper. Should you not wish for your name to be printed in the ceremony programme or local newspaper, please visit <https://glyndwr.ac.uk/graduation/> to download and complete a "Request to withhold personal details" form. This form will need to be completed and returned by email to [graduation@glyndwr.ac.uk](mailto:graduation@glyndwr.ac.uk) by the registration deadline.

If you attend a graduation ceremony, your name and award title will be read out immediately prior to you walking across the stage.

Should you win a prize, we may publish details of this in the Graduation programme and also have to notify the prize donator/sponsor to award the prize.

All ceremonies are broadcasted live on the WGU website via YouTube and will remain on YouTube in perpetuity (this does not affect your rights as noted in section 9). Graduands and guests will be filmed and photographed during the Graduation ceremony. Should any guests not wish to be filmed or photographed during the ceremony, please contact [graduation@glyndwr.ac.uk](mailto:graduation@glyndwr.ac.uk) before the registration deadline to request this. It is your responsibility to inform your guests that they will be filmed and it will be live streamed on YouTube.

Once your award is achieved (where Glyndŵr University is the award provider), it is recorded in the Digital Certificates system provided by a supplier called Advanced Secure Technologies in order for us to produce your award certificates. WGU has a Data Sharing Agreement in place in order for them to have access to the system for maintenance and upgrades.

Alternatively, other awarding bodies i.e. University of Wales, University of Chester, St Mary's University and Pearson will be notified of your award where applicable in order to confirm your award and produce your certificate.

### Corporate events

Where you are an individual or an organisation who is invited to a University event via corporate invitation, data is collected on a University personal database. This data includes your name, address (may vary between business and personal address) and contact details and is collected so that invitations to these events can be sent to you. This data is kept for as long as the individual or organisation is a stakeholder or a key contact of the University. If you wish to be removed from the Corporate events database please email [g.beer@glyndwr.ac.uk](mailto:g.beer@glyndwr.ac.uk)

### CCTV & Body Worn Cameras (BWC's)

**CCTV** captures visual images of persons in or around our buildings and facilities. Where CCTV is operated, this is for the safety and security of the University premises and for the prevention and detection of crime and anti-social behaviour. When the University uses CCTV, these cameras will be clearly signposted. Please see section 6 of this Notice regarding our lawful basis for using CCTV

**Body worn** video (BWV) also known as body cameras or **body-worn cameras** (BWC's), are cameras that are worn by a person (WGU Security Staff). They are usually attached to clothing or an integrated part of a uniform and will **only** be used when operationally necessary. Glyndŵr Security Services is committed to maximizing the effectiveness in tackling anti-social behaviour, reducing crime and disorder and maintaining a safe, secure environment for staff, students and members of the public whilst on University property. Images of individuals captured on BWC's are likely to be personal data as defined by data protection legislation. Please see section 6 of this Notice regarding our lawful basis for using BWC's. Further information regarding the University's use of BWC's is available on our [website](#).

### Visiting Campus – Track and Trace and Protect

In order to best respond to our legal responsibilities under Public Health, it is necessary for the University to collect personal details about you as a visitor to our campus. You are providing this information for a specific reason and we will be processing this information in order to protect your vital interests (Article 6(1)(d)) and for the performance of a public task as it allows the University to comply with our legal responsibilities around public health (Article 6(1)(e)). The collection of this information is necessary to ensure your safety and well-being at visiting the campus, in accordance with Welsh Government guidance, to manage and enable us to effectively keep you safe. The information on the form will be retained for no longer than three weeks and will be kept secure and destroyed using our confidential waste process.

#### **4. How we hold your data**

We have given information in section 3 of this Notice about the ways your data is stored. Please see the list of databases in Schedule 1 of this Notice for more information. Section 9 of this Notice contains information about your right to be forgotten and how you can exercise it.

#### **5. The lawful basis for us processing your data and how we use that data**

We will process your personal data either in ways you have consented to, or because it is otherwise necessary for a lawful purpose:

As part of the contractual relationship between you and the University (for example in relation to a ticket you have purchased or obtained).

In this respect we use your personal data for the following purposes:

- To deliver the Event you have registered for;
- To correspond with you about the event, including sending you pre and post-event information.

As part of this process, we will expect to share your personal data with:

- Our agents, contractors and service providers (including providers of accommodation, catering, IT, webinar and other support services) where applicable and where it is necessary for them to receive the information;
- Our bank to whom payment details are provided in order to process a payment;
- Co-organisers or partners who are involved in the delivery of an event;
- Relevant professional bodies or institutions where membership or affiliation affects your entitlement to attend (or results in a discount on) an event.
- Where required, to organisations to manage and mitigate the spread and impact of the current outbreak of coronavirus (COVID-19) risks to public health (e.g. Track and Trace and Protect).

As necessary for the performance of tasks carried out in the public interest

Your personal data will be processed because it is necessary for the performance of tasks carried out in the public interest. For example, if you are a student at WGU and are expected to graduate, your data will be processed as it is necessary for the performance of a public task. WGU is an educational establishment and in particular its educational activity is conducted in a public interest, therefore the public task concerned would be to ensure that you graduate after you have completed your education with us.

Other legitimate interests

Your personal data will also be processed because it is necessary for the University's legitimate interests or the legitimate interests of a third party. This will always be weighed against your rights, interests and expectations. Examples of where we process data for purposes that fall under legitimate interests include:

- Creating biographies of attendees or a delegate or speaker list and distributing the biography/list to speakers and attendees (except in circumstances where it is appropriate to gain your consent);
- Sharing your information with sponsors of an event (except in circumstances where it is appropriate to gain your consent);
- Filming, photographing or otherwise recording events and publishing such content on our website, social media accounts and other formats where it would not be necessary, appropriate or practicable to obtain your specific consent (for example we may seek specific consent for prominent or impactful uses);
- Analysing who is attending our events, including so that we can monitor the success of our outreach programmes and understand trends in participation (for example, by

monitoring participation by socio-economic group);

- Processing feedback to improve the quality of our events and marketing activities;
- Marketing the university and its events by post, telephone, social media and electronic mail (but without prejudice to your rights under the legislation that regulates the sending of marketing communications by electronic means);
- Consulting our professional advisers where it is necessary for us to obtain their advice or assistance.

In addition to those organisations named above, we may also share your personal data with;

- Our agents and contractors where they require your personal data to perform the services outlined above; and
- Direct mail agencies who assist the University in the administration of marketing communications.

### Legal obligations

Your personal data will be processed for compliance with the University's legal obligations. For example:

- For the detection and prevention of crime and to assist the police and other competent authorities with investigations;
- To comply with tax legislation, safeguarding duties and subject access requests of others.

In this respect, as well as the organisations mentioned above, we may in specific circumstances need to share your personal data with third parties who have made legitimate requests under data protection or freedom of information law; the police and other law enforcement agencies; HMRC and the University's external auditors.

### Where you have consented:

Your personal data will also be processed by the University where we have your consent.

Examples where consent would be sought include where the law or some other protocol requires that the University obtains your consent (for certain marketing or fundraising communications) or where, we feel it is appropriate to obtain your consent for our processing, rather than rely on the legitimate interests basis as outlined above.

Where applicable, consent will always be specific and informed on your part, and the consequences of consenting or not, or of withdrawing consent, will be made clear.

## **6. Special Categories of personal data**

In addition to the processing of the above, the University may process types of personal data that the law considers to fall into a special category (such as race, religion, health, sexual life or criminal record). This will be undertaken under the following circumstances:

- Where you have provided your explicit consent. Examples might include where you have provided information on your dietary requirements, allergies or where you inform us of the requirement for particular access to an Event;

- Where such processing is necessary for the establishment, exercise or defence of legal claims (including sharing with the University insurers and legal advisers) or the prevention or detection of crime (for example, detecting criminal actions through the use of CCTV, BWC's or reporting allegations to the police);
- Where it is in your vital interests to do so and you are incapable of giving consent, for example to inform your specified emergency contact, the NHS or emergency services in the event of your illness or other emergency.
- Where required, your contact details and special category information (health) to be shared with organisations to manage and mitigate the spread and impact of the current outbreak of coronavirus (COVID-19) risks to public health (e.g. Track and Trace and Protect). Article 9 (2 (c) processing "special categories" of data is necessary in order to protect the vital interests of the data subject or of another natural person – by sharing contact details of person (s) with symptoms of ill health (e.g. Covid-19 symptoms) which maybe the data subject or another natural person that they may have come into contact with on University premises and may have underlying health conditions. Article 9(2)(g) – substantial public interest and DPA 2018 Schedule 1 Part 2 para 6 (Statutory and government Purposes) Article 9 (2) (i) public health purposes and DPA 2018 – Schedule 1 Part 1 para 3 Public Health.

## **7. International transfers of data**

The University will in limited circumstances disclose personal data to third parties or allow personal data to be stored or handled in countries outside of the European Economic Area. For example, we will transfer data to IT or other platform providers based overseas such as MailChimp, Google and Eventbrite.

In these circumstances, your personal data will only be transferred where the transfer is subject to one or more of the 'appropriate safeguards' for international transfer prescribed by applicable law, such as:

- An approved certification mechanism such as Privacy Shield or equivalent;
- Where the University has entered into contractual clauses approved by the European Commission that provide appropriate safeguards; or
- There exists another situation where the transfer is permitted under applicable law (for example, where we have your explicit consent).
- International transfers of data is subject to change, please refer to the ICO guidance.

## **8. How long we keep your data**

We have given information in section 3 of this Notice about the length of time for which we will keep your personal data in connection with some categories of processing data. Further information regarding retention of personal data can be obtained from the Data Protection Officer and can be found within the Data Retention Schedule: <https://glyndwr.ac.uk/information-governance/policies-and-statements/>.

Section 9 of this Notice contains information about your right to be forgotten and how you can exercise that right. Please note that in the circumstances that your data is made public in accordance with this Notice, the University is no longer in control of this data, and therefore your right to be forgotten cannot be exercised in this way. However, you can request that the University does not re-publish your data in the future.

## 9. Your rights

Under the UK GDPR, you have the right to:

- Withdraw consent where that is the legal basis of our processing;
- Access your personal data that we process and information about that processing;
- Rectify inaccuracies in personal data that we hold about you;
- Be forgotten, that is your details to be removed from systems that we use to process your personal data;
- Restrict the processing in certain ways;
- Data portability: where we are processing data that you have provided to us, on the basis of consent or as necessary for the performance of a contract between us, you have the right to ask us to provide your data in an appropriate format to you or another controller; and
- Object certain processing of your personal data by us.

Please note that the above rights are not absolute, and requests may be refused where exceptions apply. Please see <https://ico.org.uk> for further information on these rights.

If you have any questions about these rights or how your personal data is used by us, please contact the Data Protection Officer on [dpo@glyndwr.ac.uk](mailto:dpo@glyndwr.ac.uk) for further information. If you are not satisfied with how your personal data is used by the University you can make a complaint to the Information Commissioner at <https://ico.org.uk>.

### Schedule 1: List of databases

The databases listed are subject to restrictions, and only those permitted can access any data which is kept in them.

- The University's Student Record System
- Oracle databases
- RS2000 booking system
- Consumer Relationship Management systems
- Other internal University databases.
- Sportsoft Leisure Management System

| <b>Review</b>    | <b>Author:</b>                          | <b>Additions:</b>  |
|------------------|---|--|
| d August<br>2020 | Leonna<br>Messiter                      | Relate to the collection of personal data and when required, sharing of personal data to a third party (includes special category – relating to health) for Track, Trace and Protect purposes.   |
| April<br>2022    | Leonna<br>Messiter                      | Body Worn Cameras (BWC's)<br>GDPR updated to UK GDPR<br>International Transfer section updated to reflect subject to change and to refer to ICO guidance.  |
| June<br>2022     | Leonna<br>Messiter;<br>Gabby<br>Gardner | Section 3 What categories of Personal data are collected under Gradation - updated link to download "request to withhold personal details form" and added that prize winners' details <b>may</b> be published in the Graduation programme. |



Section 7 International transfers of data - An approved certification mechanism updated to remove “such as Privacy Shield or equivalent”.