Privacy Notice – Marketing and Communications at Ulster University

This Privacy Notice explains how Ulster University (University) collects, uses and processes participants' personal data as a data controller and explains participants' rights in relation to the personal data that the University processes during and for marketing activities.

The University actively seeks to preserve the privacy rights of those individuals that share information with the University. The personal data which you provide to the University will be processed in accordance with UK data protection legislation, specifically UK GDPR and the Data Protection Act 2018.

What is the purpose and legal basis of the processing?

The University photographers and videographers document the life of the University through the year, taking photographs and video footage of people, places, and events for use in publications, campaigns, social media and on our website. The University may also share photographs and video footage sourced or submitted to us from social media of people, places and events for use in publications, campaigns, social media and on our website.

The following lawful basis that applies:

UK GDPR Article 6.1(a) – the data subject has given **consent** to the processing of their personal data for specific purposes.

UK GDPR Article 6.1(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

UK GDPR Article 6.1 (f) – the processing is necessary for the University's legitimate interests.

We will use this on the basis of our legitimate business interest to record and promote our work. We will inform you that we will be capturing and using your image (via event stands, posters or email) and make this privacy statement available to you.

For processing special category data, our legal basis for processing is:

UK GDPR Article 9(g) – reasons of substantial public interest (with a basis in law).

How the University collects your personal data

The University shall collect the personal data from you directly. The University collects your data through photographs and video footage from events or shoots which document the life of the University through the year, of people, places, and events for use in publications, campaigns, social media and on our website, as well as occasional third party use.

Change of Purpose

The University will only use your personal data for the purposes for which it collected in, unless the University reasonable considers that it needs to use the personal data for another reason and that reason is compatible with the original purpose. If the University needs to use your personal data for an unrelated purpose it shall notify you and explain the legal basis for which allows the University to do so.

How long does the University hold your personal data?

Personal data collected as part of **Marketing and Communications at Ulster University** will be retained in line with the University's Retention & Disposal Schedule.

The University's Retention and Disposal Schedule includes guidance on retention and disposal periods. A copy of the Schedule is available at https://www.ulster.ac.uk/__data/assets/pdf_file/0009/286461/Records-Retention-and-Disposal-Schedule.pdf

Categories of personal data processed by the University

Personal Data

The University may collect, use, store and transfer the following types of personal data as part of this processing:

We value your privacy and under the terms of the UK General Data Protection Regulation UK GDPR and the Data Protection Act 2018 these images will constitute your personal data if you can be individually identified in them.

- Your Name
- Your image
- Your voice

Special Category Data

"Special Categories" or particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation require higher levels of protection. The following categories of special category data will be processed:

- Racial or ethnic origin

Who does the University share your data with

The University shares personal data with third parties where necessary for the purposes of the processing and where there is a legal basis to do so. Where information is shared with such third parties, the University will seek to share the minimum amount necessary.

As part of this processing the University may share your personal data with the following third parties:

Photographers
Newspapers / magazines
Publishers
Social media platforms
Partner universities including global international partners
External design agencies
UCAS
Schools and colleges
Events companies

We require third party service providers to respect the security of your data and to treat it in accordance with the law.

The University respects individuals' privacy and if after taking part in any of the above promotional activities, you change your mind, you can contact us to request a restriction to further processing. Each request will be considered on a case-by-case basis.

International Transfers

The University will transfer your personal data to the following countries outside of the United Kingdom:

- Republic of Ireland

In these circumstances your personal data is being transferred on the basis that the Secretary of State has made an adequacy regulation in respect of said countries. This means that countries are deemed to provide equivalent protection to personal data as provided by the UK data protection regime.

In addition to those countries listed above, the University will also transfer your personal data to the following countries outside the United Kingdom:

- Occasionally images or video may be shared to promote the University at our international campuses or with partners in countries such as India, Dubai, USA, China etc.

These countries are deemed not to provide an adequate level of protection for your personal data. However, to ensure that your personal data does receive an adequate level of protection, the University have or will put in place International Data Transfer Agreements (IDTAs).

Your rights as a Data Subject

As a University data subject you have the right to:

- Access and obtain a copy of your personal data on request;
- Require the University to change incorrect or incomplete personal data;
- Require the University to delete or remove your personal data, for example where the data is no longer necessary for the purposes of processing. Note, however that the University may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- Object to the processing of your personal data where the University is relying on its legitimate interests as a legal ground for processing;
- Where the University is relying upon consent to process your personal data, you may withdraw your consent at any time; and ask the University to stop processing personal data for a period if the personal data is inaccurate or there is a dispute about whether or not your interests override the University's legitimate grounds for processing the personal data.

Further information and your right to complain

Further information in respect of the University's practice in respect of data protection and our Data Protection Policy is available at https://www.ulster.ac.uk/about/governance/compliance/gdpr.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request the University transfer a copy of your personal information to another party, please contact the University's Data Protection Officer,

Eoin Coyle
Data Protection & Information Compliance Manager
Ulster University, Room J308
Coleraine
BT52 1SA
GDPR@ulster.ac.uk

If you are not satisfied with how the University is processing your personal data, you can make a complaint to the ICO. Further information about your data privacy rights are available on the ICO's website at: www.ico.org.uk.