

# **Profile Privacy Notice**

## Introduction

Throughout this privacy notice, "University" "we", "our" and "us" refers to the Norwich University of the Arts. "You" and "your" refers to the Profile account holder.

Norwich University of the Arts is a registered data controller. We collect, hold and process personal information for students and graduates who have registered to use our Profile website. We hold personal information and comply with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA).

You may also want to read <u>other Norwich University of the Arts privacy notices</u>. If you use our website, please read the website privacy notice. We do our utmost to protect your privacy. As such we have security systems and procedures to protect information from unauthorised disclosure, misuse, or destruction.

## What types of information we hold about you

The personal information stored on the University's Profile site will be data (including any sensitive data) which you have chosen to provide.

When you register to use the site, you are given the option to allow the University's Profile Team access to any information you complete on your Profile area, for example your CV. If you do not give your consent to this, our Profile Team will only be permitted to view your name and contact details. This will not affect your ability to use the site's resources as normal, and you will still gain access to our jobs board and events when you log into your account.

#### How and why we collect this information

We collect the personal information, which you choose to provide, in order for us to provide the service you have requested, when registering for your Profile account.

The University complies with the provisions of the Data Protection Act 2018 which sits alongside the UK General Data Protection Regulation (UK GDPR). Article 6 of the UK GDPR defines six different lawful grounds for an organisation to be permitted to process personal data, and the University is legally obliged to determine and advise you of under which of the legal bases your personal data is processed.

We rely on Article 6(1)(a), '*Consent*' as our legal basis which applies when you have given us your freely given, informed, specific consent. Additionally, if you choose to include sensitive personal data in your

Profile area, the University is required to identify an appropriate lawful condition under Article 9 of the UK GDPR which is Article 9(2)(a) *'explicit consent'*.

It is important to note that you have the right to withdraw that consent at any time, as detailed later in this Privacy Notice under 'Your rights.'

#### How we use your information

The University will always store your data safely and will never disclose it to any other person unlawfully. The tasks the University may undertake using your data may include:

- Contacting you to make you aware of employability and business support activities offered by the University;
- Contacting you as a member of the University's alumni community after you leave (please also read our separate <u>Alumni Privacy Notice</u>).

We are always keen to find ways to improve our courses, support our students and alumni community, and to understand the impact and effectiveness of our employability activities. To help us to do so, we use the data held to undertake analysis for the purposes of reporting, comparing and assessing our courses and activities. This can include current and historic data. As an example, we may focus on a specific course and compare recent information with the historic data held for our alumni, in order to track our progress. Where we undertake this analysis, wherever possible, we will anonymise the data so no individuals can be identified.

# Automated Decision Making and Profiling

As part of our commitment to protecting your personal data, we want to inform you that the University currently limits the use of automated decision-making and profiling in line with the requirements of the UK GDPR. However, as we continue to develop our services, there may be instances in the future where automated processes are used to make decisions or create profiles. Should this occur, we will ensure that appropriate safeguards are in place and will always ensure that human intervention is involved when decisions are made that impact you.

## Who we might share your information with

Your personal data may be shared between our different departments to help us understand our relationship with you.

We may disclose certain personal information to external organisations to carry out our functions and manage our operations or because you asked us to. These may include, but are not limited to;

- When you have given us permission to do so
- To third parties engaged by the University as approved data processors such as Digital Ocean
- Third party software systems required to facilitate our data functions (for example Donor, Azorus). Some of these organisations may be based outside of the UK. These organisations have safeguards in place, which meets appropriate standards, to protect your personal data.

## International Transfers

#### **International Data Transfers**

We may transfer your personal data to countries outside the UK (third countries), including countries within the European Economic Area (EEA) and beyond, where our third-party service providers or affiliated organizations are based. Such transfers may involve countries that do not have data protection laws equivalent to those in the UK.

When transferring personal data to a third country, we take steps to ensure that your data is protected in line with the UK General Data Protection Regulation (UK GDPR). These measures include the use of the following safeguards, where appropriate:

- 1. **Standard Contractual Clauses (SCCs)**: For transfers to third countries that do not provide an adequate level of data protection, we implement the European Commission's Standard Contractual Clauses (SCCs) or equivalent contractual mechanisms as approved by the UK Information Commissioner's Office (ICO). These clauses legally bind the recipient of the personal data to ensure that your data is processed in accordance with the standards set out by the UK GDPR.
- 2. Adequacy Decisions: Where applicable, we may transfer your personal data to a third country that has been recognised by the UK government as providing an adequate level of data protection. In such cases, no further safeguards are required, and the transfer will be made in compliance with the UK's adequacy regulations.
- 3. **Additional Safeguards**: In some cases, additional measures may be taken, such as encryption, pseudonymisation, or other technical and organisational safeguards, to further protect your personal data during the transfer process.
- 4. **Transfers to Internal Organizations**: Your personal data may also be transferred to other entities within our university group or related organizations, including those based outside the UK, to support internal administrative functions, academic services, or research purposes. Any such transfers will be governed by appropriate safeguards, including but not limited to SCCs or other legally recognised measures under the UK GDPR.

We will ensure that any data transfer to third countries is carried out with appropriate legal protections in place, and we will provide you with further information upon request regarding the specific safeguards applied in relation to your data.

## How long we keep your information

The information you enter into your Profile account is managed by you, and as such it is your responsibility to maintain or delete it. We will continue to store your information indefinitely or until such a time we discontinue the website. Should we do this, we will email you to advise you this is our intention. Should you wish to delete your record altogether, please contact us at <u>careers@norwichuni.ac.uk</u>.

# Your rights

Under data protection law, you have rights including:

- Your right of access You have the right to ask us for copies of your personal information (this is known as a Subject Access Request or SAR).
- Your right to rectification If you wish to correct any information we hold about you, please log in to your account or contact <u>careers@norwichuni.ac.uk</u> in the first instance.
- Your right to erasure You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact our Data Protection Officer at <u>dataprotection@norwichuni.ac.uk</u> if you wish to make a request or have any queries.

If you believe your data has been breached, please speak to the University. The <u>Information</u> <u>Commissioners website</u> provides more information on data breach rights.

Communications may be sent to you by post, telephone or electronic means (principally by email) depending on the contact details we hold, and the preferences expressed by you about the types of communications you wish to receive. To let us know how you would prefer to keep in touch with us or to request no further communications from us, contact <u>careers@nua.ac.uk</u>

#### How to contact us

If you require further information or have any concerns about how your personal information is held and processed by us, please email the University's Data Protection Officer (Chris Dubinski) at <u>dataprotection@norwichuni.ac.uk</u> or write to us at Data Protection Officer, Norwich University of the Arts, Francis House, 3 -7 Redwell St, Norwich NR2 4SN.

You can also complain to the ICO if you are unhappy with how we have used your data. Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

ICO Helpline number: 0303 123 1113 ICO website: https://www.ico.org.uk

#### Changes to this privacy notice

We keep our privacy notices under regular review.

This privacy notice was last updated April 2025.