



Publication of Student Work 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 students.

This Privacy Notice explains the purposes of the University when publishing the work of students for marketing and promotional reasons. It details how and why we use your work and associated personal data, our lawful bases for processing, our retention periods, and how you can exercise your rights.

Norwich University of the Arts is a registered data controller. We collect, hold and process personal information relating to your work undertaken during your period of study with us. We process your personal data in compliance and accordance 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 other Norwich University of the Arts privacy notices. 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

For the purposes of publishing your work, the University will always aim to credit you by name, where possible. No other personal data will generally be used unless we seek your consent in advance.

How and why we collect this information

We collect personal information directly from you when you study with us. Where we wish to publish your work for the purposes of promoting our courses and the achievements of our students, we will first contact you to make sure you are happy for us to do so.

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.

The University will generally rely on Article 6(1)(f), '*legitimate interests*' as its legal basis where we judge the use of the personal data to be within our legitimate interests. We have a legitimate interest to be able to promote the University using the work of our students for marketing purposes.

It is important to note that, although we will ask for your prior approval to publish your work, we will rely on 'legitimate interests' as our legal basis rather than 'consent' in processing your personal data for this purpose. This means that, if your work is published and you later decide to 'opt out,' we may be unable to fully remove your personal data from the public domain or our records. Exercising your right to opt out after the event will not affect the lawfulness of any processing we conducted prior to your withdrawal.

How we use your information

The University may wish to use your work for promotional purposes in various ways, including on our website, on external website and publications, in our prospectus and on social media. Where possible, we will always aim to credit you by name.

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 work and name may be shared with external organisations for the purposes of marketing and/or may be publicly available, according to the purposes of the publication. You will be advised of how your work will be used when we contact you to seek your agreement to take part in such activities.

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

Your work will generally be retained by the University for a maximum of five years, although it may be deleted earlier. Where your data has been shared with other organisations and/or online, this may be retained longer by those parties, depending on the circumstances.

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 - You have the right, in certain circumstances, to ask us to rectify personal information you think is inaccurate or incomplete. If you wish to correct any information we hold about you, please contact info@norwichuni.ac.uk 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 (Chris Dubinski) at dataprotection@norwichuni.ac.uk 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 [Information Commissioners website](#) provides more information on data breach rights.

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 dataprotection@norwichuni.ac.uk or write to us at Data Protection Officer (Chris Dubinski), 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.