

Corporate Privacy Notice

Policy Name:	Corporate Privacy Notice		
Approval Date:	11/09/2026	To Be Reviewed:	Annually
Approved By:	Management Committee	Version:	2.0

Policy Statement

This privacy notice explains how Roehampton Students' Union collects, uses, stores, and shares personal data about the individuals who interact with us. This includes student members, associate members, affiliate members, honorary members, event attendees, customers, volunteers, website visitors, survey participants, suppliers, and contractors.

RSU collects and processes personal data in order to fulfil its charitable purposes as a registered charity and company limited by guarantee, including administering memberships, running elections, managing student groups, providing advice and support services, organising events, and communicating with the people we represent and serve. We do so in accordance with the UK General Data Protection Regulation, Data Protection Act 2018, Privacy and Electronic Communications Regulations 2003 (as amended), and the Data (Use and Access) Act 2025.

Corporate Privacy Notice

Whether you're a student member, an associate member, an event attendee, a café customer, a volunteer, a supplier, or a visitor to our website, this policy explains how we look after your personal data. The full details follow in the numbered sections below.

What data do we collect?

That depends on your relationship with us. If you're a student at the University of Roehampton, the University shares basic information with us so we can administer your membership. If you use our services, we collect what we need to provide those services. If you're an associate member, event attendee, or website visitor, we collect only what's relevant to that interaction. We never collect more than we need.

Why do we use it?

To run the Students' Union including: administering memberships, running elections, managing student groups, providing advice, organising events, and keeping you informed. Our main legal basis for processing member data is legitimate interests where we use your data in ways you'd reasonably expect. For other activities we rely on contract, consent, legal obligation, or vital interests depending on the situation.

Do we share it?

We never sell your data. We share it only with organisations that help us run our services, with the University of Roehampton under our Data Sharing Agreement, and where the law requires it.

How long do we keep it?

Only as long as we need to. Our full retention schedule is available on request from the Data Protection Lead

What are your rights?

You can access, correct, or delete your data, object to how we use it, or withdraw your consent. Contact rsu@roehampton.ac.uk (mark your email 'Data Protection'). You can also complain to the ICO at ico.org.uk/concerns.

Can you opt out of membership?

Yes. Under the Education Act 1994, you can opt out of Student Membership at any time. To make sure you're not disadvantaged, you'll automatically be granted free Affiliate Membership, which still gives you access to our services and facilities.

1. Who we are

- 1.1 Roehampton Students' Union (RSU) is the representative body for students at the University of Roehampton. We're a company limited by guarantee (No. 07323081) and a registered charity (No. 1139857). We are the data controller for the personal data described in this policy.

Address	Lawrence Building, Froebel College, Roehampton Lane, London, SW15 5PJ
Data Protection Lead	Chief Executive Officer
Data Protection Enquiries	rsu@roehampton.ac.uk
ICO Registration	ZA161670

- 1.2 If you have any questions about this policy or how we use your data, contact us using the details above. If you're not satisfied with our response, you can complain to the Information Commissioner's Office (ICO) at ico.org.uk/make-a-complaint/.

2. What this policy covers

- 2.1 This policy explains how RSU handles personal data about everyone who interacts with us including but not limited to student members, associate members, event attendees, customers, volunteers, website visitors, survey participants, suppliers, and contractors.
- 2.2 We handle all personal data in line with the data protection principles set out in UK GDPR Article 5, and in accordance with the UK General Data Protection Regulation, Data Protection Act 2018, Privacy and Electronic Communications Regulations 2003 (as amended), and the Data (Use and Access) Act 2025.
- 2.3 For some of our services, we produce separate, more detailed privacy notices. Where this applies, you'll be given the relevant notice at the point of data collection. We also take a just-in-time approach to transparency. Where you engage with a specific service, we'll provide the relevant information about how your data is handled at that point.

3. Where we get your personal information from

- 3.1 We get your personal data from a number of sources. The legal basis for processing depends on how and why we receive it.
- 3.2 When you become a member
- 3.3 As a student at the University of Roehampton, you automatically become a member of RSU. The University shares and keeps up to date a defined set of information about you and your studies under our Data Sharing Agreement. When the University gives us this data, we become responsible for it and use it as our central record of your membership.
- 3.4 If you opt out of Student Membership, you'll automatically be granted free Affiliate Membership in accordance with our Bye-Laws, ensuring you're not disadvantaged as the Education Act 1994 requires. To manage this, we will place you on our Affiliate Membership register and make sure you're not included in Student Membership processing such as elections communications. If you want to resign your Affiliate Membership entirely, contact us and we'll delete your data retaining only a minimal record for our charity record-keeping obligations.

- 3.5 The legal basis is legitimate interests. RSU has a clear interest in representing its members and providing them with services. This is directly related to your relationship with us and is something you'd reasonably expect. We retain a minimal record of your name and resignation date for our corporate record-keeping obligations.
- 3.6 When you give it to us directly
- 3.7 You may give us information when you join a student group, buy an event ticket, purchase something from our shop or café, volunteer, take on a committee role, enter an election, use our advice service, submit a support query, provide academic feedback, take part in a survey, purchase an associate membership, or communicate with us. When you give us this information, we take responsibility for looking after it and, where relevant, cross-reference it against our central membership record.
- 3.8 The legal basis depends on the activity:
- When you buy something from us such as a society membership, an event ticket, a coffee, or an associate membership, we process your data to fulfil that transaction. The legal basis is performance of a contract.
 - Where you take on a committee or volunteer role, you enter a volunteer agreement that includes consent to the processing of your data for that role. The legal basis is consent.
 - Where you engage with our advice service, you consent to the processing of your data when you agree to the service's terms and conditions. The legal basis is consent. For sensitive personal data: explicit consent. In safeguarding situations: vital interests.
 - Where you submit a support ticket, provide academic feedback, take part in a survey, or voluntarily provide equality and diversity information, the legal basis is consent.
 - From time to time, the Board of Trustees awards honorary membership to individuals. If you are offered honorary membership, we'll ask for your consent to hold your details. The legal basis is consent.
- 3.9 When we need to keep you safe
- 3.10 This applies across all RSU activities and services. Where our activities involve a degree of risk, whether that's an event, a society trip, a volunteering placement, or any other RSU activity, we may ask you for emergency contact details and relevant medical information. We only collect this where it's genuinely needed for the activity in question, and we may make it a condition of participation.
- 3.11 If a safety or medical incident occurs on our premises or at any RSU activity, whether or not we've collected your information in advance, we'll record your name, a description of what happened, any injuries, and the actions taken. We keep incident records for 6 years to meet our legal obligations under health and safety legislation and for insurance and liability purposes. You cannot ask us to delete an incident record during this period.
- 3.12 The legal basis changes through the lifecycle of this data:
- For collecting emergency contact and medical data before an activity the legal basis is legitimate interests. RSU has a clear interest in managing activity risks and keeping participants safe.

- For sharing that data with emergency services during a medical emergency the legal basis is vital interests. This applies where someone's life or safety is at immediate risk and obtaining their consent is not possible.
- For recording and retaining incident reports the legal basis is a legal obligation under health and safety law, combined with substantial public interest for the processing of health data in the context of statutory duties.

3.13 When we collect it as you use our websites

3.14 When you visit our websites, we automatically collect certain technical data, your IP address, browser type, pages visited, and session duration, to help us understand how the site is used and improve it. Our websites use cookies. Full details are in our separate [Cookie Policy](#). In summary: essential cookies don't require consent, analytics cookies are assessed under the DUAA 2025 low-risk exemption where applicable, and marketing cookies are placed only with your explicit consent.

3.15 If you create a guest account on our website (i.e. you're not a registered student), we hold the information you provide during registration plus any purchase history or event attendance.

3.16 The legal basis is legitimate interests for analytics and site operation, performance of a contract for guest account transactions, and consent for non-essential cookies and marketing.

3.17 When other organisations share it with us

3.18 Your information may be shared with us by the University of Roehampton, event partners, or other third parties. They will only do so where they have a lawful basis for the transfer. You should check their privacy notice when you provide your information to understand how they will process your data.

3.19 Where demographic data (such as gender, ethnicity, or disability status) is shared with us by the University under the Data Sharing Agreement, we use it for aggregate statistical analysis and service planning. This data is anonymised or aggregated wherever possible. The legal basis is legitimate interests.

3.20 When other people give us your information

3.21 Information may be given to us by other students, staff, or members of the public, for example in the form of election nominations, incident reports, complaints, or general communications.

3.22 Where we receive personal data about you from someone else, we'll only use it for the purpose it was provided. If we need to process it beyond that original purpose, we'll contact you directly. The legal basis depends on the context, for example, legitimate interests for processing an election nomination, or legal obligation for recording an incident report.

4. What personal data we collect

4.1 The type and amount of information we collect depends on your relationship with us and how you engage with our services.

4.2 Data the University shares with us about student members:

- Your name and student ID
- Your institutional email address
- Your course, college, and department
- Your residency status and term-time postcode
- Your programme year and mode of study
- Your individual barcode number.

4.3 Additional data we may collect when you use our services:

- Your name, email, and contact information
- Your transaction and payment reference
- Your society or club role
- Your volunteering hours, role, and placement organisation
- Your training records and DBS check outcome
- Your delivery address
- Your support query and contact details
- Your interests and communication preferences
- Equality and diversity information
- Advice case details and correspondence
- Your academic feedback
- Your survey and consultation responses.

4.4 Data we may collect for safety purposes:

- The name and phone number of your emergency contact
- Any relevant medical conditions, allergies, or medication
- If an incident occurs: your name, a description of what happened, any injuries, and the actions taken.

4.5 Emergency contact and medical data is collected at the point of purchase or sign-up for activities that involve a degree of risk. Depending on the activity, this may be collected through our membership system, ticketing platform, or a separate form. Access to this data is restricted to authorised staff through role-based permissions. Incident records are retained for 6 years.

4.6 Some of the data listed above is classified as 'special category' under UK GDPR, this includes equality and diversity data, health and medical information, immigration status (in advice casework), and criminal records data (DBS checks for relevant roles). We only process this data where we have both a lawful basis and an additional legal condition as required by law. We control access to this data through role-based permissions within our membership system, ensuring only authorised staff can view it. All staff with access are subject to confidentiality obligations.

4.7 What we use your data for

4.8 We use your personal data for the purposes set out below. Not all of these will apply to you as it depends on your relationship with us and how you engage with our services.

- Administering your membership and verifying your identity
- Giving you access to RSU services and facilities
- Running elections and democratic processes

- Administering student group memberships and supporting committee members
- Processing purchases and managing event capacity and safety
- Coordinating volunteering placements and recognising your contribution
- Providing confidential advice and support services
- Managing emergency contact and medical information to keep you safe
- Communicating with you about RSU services, events, activities, and opportunities
- Segmenting our communications so we send you things that are relevant to you
- Monitoring equality, diversity, and inclusion across our membership
- Supporting student group committees with queries and administration
- Collecting and acting on academic feedback to improve the student experience
- Analysing and improving our services
- Meeting our financial, legal, and regulatory obligations

5. Profiling, marketing and communications

5.1 Membership communications

5.2 We send members newsletters to your registered email address about RSU services, events, activities, and democratic processes. Keeping you informed about what's going on is a core part of our charitable purpose and something you'd reasonably expect as a member. You can unsubscribe at any time using the link in any email.

5.3 Our newsletters may occasionally include advertising from partner organisations. We never share your personal data with advertisers, they provide us with creative content and we insert it into the newsletter. We may provide advertisers with aggregate performance data such as total clicks or open rates, but this never includes any information that could identify you.

5.4 The legal basis is legitimate interests. For PECR compliance, we rely on the charitable soft opt-in, extended to charities by the Data (Use and Access) Act 2025. This requires that the communication furthers our charitable purposes, your contact details were obtained in the context of your membership, and you are given a clear opportunity to opt out in every message.

5.5 Direct marketing

5.6 We'll only send you marketing beyond the member newsletter if you've explicitly opted in. We will never sell or share your details with third parties for their marketing purposes. The legal basis is consent.

5.7 Profiling and segmentation

5.8 We may use information like your course, interests, or engagement history to segment our communications so we send you things that are actually relevant to you. For example, we might send student group event information to members who've joined a student group rather than emailing everyone.

5.9 This doesn't involve any automated decision-making that produces legal or similarly significant effects. It's used solely to make our communications more useful and the legal basis is legitimate interests. You can object to this at any time.

5.10 Controlling what you hear about

- 5.11 We make it easy for you to manage your communication preferences. You can unsubscribe or update your email preferences using the link provided in every message.

6. How we keep your data safe and who has access

6.1 Security measures

- 6.2 We take the security of your data seriously. Our measures include role-based access controls on all systems, encryption for sensitive data in transit and at rest, PCI-DSS compliant third-party payment processing (we never store card data), mandatory data protection training for all staff on induction and annually, data handling agreements signed by student leaders and volunteers before they're given access, secure disposal of paper records by confidential shredding, and immediate revocation of system access when someone leaves their role.

6.3 Who has access

- 6.4 Personal data collected and processed by us may be shared with RSU employees, elected officers, and volunteers in the course of their work. Under strictly controlled conditions, the following groups may also have access where necessary:

- Contractors
- Advisors
- Agents
- Service provider partners.

- 6.5 When we allow access to your information, we always control what they can see, what they are allowed to do with it, and how long they can access it. We undertake regular reviews of who has access to information that we hold to ensure your data is only accessible by appropriately trained individuals. We do not sell or share your personal information for other organisations to use.

6.6 Organisations we share your data with

- 6.7 We may share some or all of your personal data with the following organisations:

- University of Roehampton: membership data sharing under our Data Sharing Agreement, and finance and bookkeeping support
- Membership Solutions Ltd (MSL): our membership platform, website, elections, and online shop
- Campaign Monitor: email marketing and newsletters
- AdvicePro: advice casework management
- NUS: anonymised and aggregated data only
- National Governing Bodies: sport and society affiliation where applicable
- DBS Update Service: criminal records checks for relevant roles
- Barclays Bank: banking and payment processing
- Police, courts, or regulatory bodies: where required by law

- 6.8 We may also share personal data to protect someone's vital interests, for example with emergency services during a medical incident.

6.9 Systems where you enter your own data

6.10 Some of our services use third-party platforms where you enter your own information at the point of transaction or engagement. These providers act as data processors on our behalf, and RSU has data processing agreements in place with each of them. The platforms we currently use include:

- Ticket Tailor: event ticketing
- Stripe: website payment processing
- PayPal: ePOS payment processing across our commercial services
- Cognito Forms and Tally: online surveys and consultation forms
- Freshdesk: student group support tickets and academic feedback
- Google Analytics: website analytics
- Microsoft 365: document storage and internal collaboration

6.11 RSU does not store any card data on our systems. All payment processing is handled by PCI-DSS compliant providers.

6.12 International data transfers

6.13 Our preference is always to use UK-based providers with UK hosting. Where this isn't possible, for example because no suitable UK provider exists for a particular service, we make sure appropriate safeguards are in place under UK data protection law. Under the DUA 2025, the test for international transfers is that the standard of data protection in the recipient country is 'not materially lower' than in the UK. We assess all transfers against this standard.

6.14 Links to other websites

6.15 Our websites link to other organisations, including the University of Roehampton, NUS, and various third parties. This policy applies only to RSU's websites and services. We encourage you to read the privacy notices of other sites you visit.

7. How long we keep your data

7.1 We don't keep your data longer than we need to. Our full retention schedule, which sets out how long we keep each category of personal data, is available on request from the Data Protection Lead.

7.2 Once the relevant retention period has passed, personal data is securely deleted, anonymised for statistical purposes, or returned to you where appropriate.

8. Your rights

8.1 UK data protection law gives you a number of rights over your personal data.

8.2 The right to be informed

8.3 This privacy policy and our associated notices set out what data we collect and how we process it. At the point of collection, we'll direct you to the relevant notice and tell you why we're collecting your data.

8.4 The right of access

- 8.5 You have the right to ask for a copy of the information we hold about you. You can do this by contacting us at rsu@roehampton.ac.uk. We'll respond within one calendar month, free of charge. Under the DUAA 2025, we may pause this period while we verify your identity or clarify your request.
- 8.6 The right to rectification
- 8.7 If your data is inaccurate or incomplete, you can ask us to correct it. In most cases we'll do so within one month.
- 8.8 The right to erasure
- 8.9 You can ask us to delete your data where there's no compelling reason for us to keep it. This right doesn't apply where we have a legal obligation to retain data, for example, incident records, financial records, or charity record-keeping.
- 8.10 The right to restrict processing
- 8.11 You have the right to ask us to pause processing your personal data in certain circumstances, for example, while you contest its accuracy or while we consider an objection you've raised.
- 8.12 The right to data portability
- 8.13 In certain circumstances, you can ask us to provide your data in a format that can be transferred to another organisation.
- 8.14 The right to object
- 8.15 You can object to processing based on legitimate interests or for direct marketing. We'll stop direct marketing immediately on request. You can do this by contacting us or by using the unsubscribe link in any email.
- 8.16 Rights in relation to automated decision-making and profiling
- 8.17 We only use profiling as described earlier in this policy. We do not use profiling to make automated decisions that significantly affect you.
- 8.18 The right to complain
- 8.19 If you're unhappy with how we've handled your data, you have the right to complain, see Data Complaints below.
- 8.20 How to exercise your rights
- 8.21 Contact us at rsu@roehampton.ac.uk or write to the Chief Executive at our registered address. Mark your request 'Data Subject Rights Request'.

9. Data Complaints

- 9.1 We take data protection seriously and want to resolve any concerns quickly. If you have a complaint, contact us first: rsu@roehampton.ac.uk (mark 'Data Protection Complaint') or write to the Chief Executive at our registered address.

- 9.2 Under the DUAA 2025, we're required to acknowledge your complaint within 30 days and to respond without undue delay.
- 9.3 If you're not satisfied with our response, or prefer not to contact us first, you can complain directly to the ICO at ico.org.uk/concerns, on 0303 123 1113, or by post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

10. Changes to This Policy

- 10.1 We may update this policy from time to time to reflect changes in the law, our processing activities, or best practice. When we make significant changes, we'll notify members by email and update the version number on this page. Previous versions are available on request from the Data Protection Lead.

11. Change Log

Version	Changes
1.0	Original policy.
2.0 – September 2026	Full redraft. Updated for UK GDPR, DUAA 2025, and PECR compliance. Corrected lawful bases throughout. Added associate and affiliate membership categories. Reorganised around data sources rather than processing activities. Simplified data category lists. Moved retention periods to standalone schedule. Combined security, data sharing, and international transfers into single section. Removed staff and trustee systems (covered by separate notices). Added profiling, marketing and communications section. Simplified third-party processor presentation. Added cross-cutting emergency contact and medical data section. Added layered summary. Corrected international transfers. Added DUAA 2025 complaint-handling obligations. Humanised tone and plain-English lawful bases throughout.