

Privacy Notice for Trustees, Directors, and Board Members

Policy Name:	Privacy Notice for Trustees, Directors, and Board Members		
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Related Policies:	• Corporate Privacy Notice • Data Protection Policy		

REVIEW HISTORY			
Date	Version	Name	Notes

Policy Statement

This privacy notice explains what types of personal data Roehampton Students' Union may hold about individuals serving as trustees, directors, senior managers, board advisors, and board observers, how we collect this data, how it is used, and who we may share information with.

RSU collects and processes this personal data in order to fulfil its legal and regulatory obligations as a registered charity and company limited by guarantee, including requirements under the Companies Act 2006, the Charities Act 2011, and UK GDPR. This includes maintaining accurate records for Companies House and the Charity Commission, managing conflicts of interest, and ensuring the ongoing governance of the organisation is properly documented.

Privacy Notice for Trustees, Directors, and Board Members

1. Introduction

- 1.1 This privacy notice explains what types of personal data we may hold about you, how we collect it, how we use and who we may share information with. We are required to give you this information under data protection law. This privacy notice should be read in conjunction with our [corporate privacy notice](#).

2. Who we are

- 2.1 Roehampton Students' Union (RSU) exists to make student life better at Roehampton. As a membership organisation for over 12,000 students, we deliver a range of services, facilities and activities that aim to create a rich social experience driven by student leaders.
- 2.2 RSU is registered as a controller with the Information Commissioner's Office (ICO), registration number ZA161670, and is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.
- 2.3 As a registered charity and company limited by guarantee, RSU is required by law to collect and maintain certain personal information about its trustees, directors, senior managers, and board members. This privacy notice explains how we handle personal data collected throughout your relationship with RSU in this capacity, including during onboarding, through governance forms and declarations, and in the course of your duties as a trustee or board member.

3. Personal information we collect

- 3.1 We collect personal information about trustees, directors, senior managers, and board members through a number of channels, including:
- Onboarding processes, including identity verification and induction documentation.
 - Our Declaration of Interest and Related Party Transactions Form, hosted on Cognito Forms.
 - Board and committee meeting papers, minutes, and attendance records.
 - Correspondence and communications with RSU staff.
 - Any other documentation submitted in connection with your role.
- 3.2 Where we use Cognito Forms to collect information, any personal data you submit will be stored and processed by Cognito Forms before being collected by RSU. While held by Cognito Forms, your information will be protected in line with their relevant Privacy Policy.
- 3.3 In the course of the above, RSU may collect the following personal data (this list is not exhaustive):
- Your name, including any former names.
 - Your date of birth.
 - Your home address.
 - Your nationality and country of birth.
 - Your occupation.
 - Information about directorships, trusteeships, or other appointments you hold.
 - Information about financial interests, company shareholdings, and related party transactions.

- Information about conflicts of interest.
- Records of your attendance at and contributions to board and committee meetings.
- Correspondence and communications relating to your role.

4. How we use your personal information

4.1 We use the information collected to fulfil our legal and regulatory obligations, including:

- Maintaining the Register of Directors as required under Section 163 of the Companies Act 2006.
- Filing information with Companies House and the Charity Commission as required.
- Managing and recording conflicts of interest in accordance with RSU's Conflicts of Interest Policy.
- Disclosing related party transactions in RSU's financial statements as required under charity accounting regulations.
- Fulfilling HMRC's fit and proper persons requirements in relation to charitable tax reliefs.

4.2 Your information will be accessed only by those with a genuine need to do so, including relevant RSU staff and, where appropriate, RSU's auditors or legal advisors.

5. How long your personal data will be kept

5.1 We will retain your personal information for seven years following the end of your term as a trustee, director, senior manager, or board member. This reflects our obligations under company and charity law and standard accounting retention requirements. After this period, your data will be securely destroyed.

5.2 Certain records, such as board and committee meeting minutes, may be retained permanently as part of RSU's governance and historical records. Where minutes and other governance documents are retained beyond the seven year period, we will remove or redact personal information that is no longer necessary, such as contact details, addresses, and other identifying information, whilst retaining the record of decisions made and actions taken.

5.3 After the relevant retention period has passed, all remaining personal data will be securely destroyed in accordance with RSU's Data Protection Policy.

6. What is the lawful basis for processing your personal data?

6.1 We process your personal data on the following lawful bases under UK GDPR:

- **Legal obligation** (Article 6(1)(c)): much of the information collected is required by law, including under the Companies Act 2006 and the Charities Act 2011.
- **Legitimate interests** (Article 6(1)(f)): for information relating to conflicts of interest and related party transactions, where processing is necessary for RSU to fulfil its governance obligations.

6.2 Where we process special category data, we do so under Article 9(2)(g) of the UK GDPR (substantial public interest) in accordance with our Data Protection Policy.

7. Who we share your personal information with

7.1 We may share your personal information with the following parties where required:

- Companies House, as required under the Companies Act 2006.
- The Charity Commission, as required under the Charities Act 2011.
- HMRC, in connection with charitable tax relief obligations.
- RSU's auditors, in connection with the preparation of RSU's annual financial statements.
- RSU's legal advisors, where necessary.
- Law enforcement or other authorities if required by applicable law.

7.2 We will never share your personal information with third parties for marketing or commercial purposes.

8. Keeping your personal information secure

- 8.1 We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.
- 8.2 We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

9. Your rights and access to information

- 9.1 Under data protection legislation you have the right to request access to the information that we hold about you. To request a copy of your data, please read our [corporate privacy notice](#) and then submit your request using your preferred method of contact.
- 9.2 You also have the right to:
- Object to processing of personal data that is likely to cause, or is causing, damage or distress.
 - Have inaccurate personal data rectified.
 - Have personal data blocked, erased or destroyed in certain circumstances. Please note that some information is required to be retained by law and cannot be deleted on request.
 - Prevent processing for the purpose of direct marketing.
 - Object to decisions being taken by automated means.
- 9.3 A right to seek redress, either through the ICO, or through the courts. If you have any questions or concerns about the way we process personal data, or would like to discuss anything in this privacy notice, please contact our Data Protection Lead: rsuceo@roehampton.ac.uk.
- 9.4 If you want to make a complaint about how we handle your personal data, we ask that you give our Data Protection Lead the opportunity to respond in the first instance but you are not obliged to do this. You can make a complaint directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>.