



UNIVERSITY OF WINCHESTER

Privacy Notice for Music centre - at 20/06/2018

The University of Winchester treats very seriously both the personal data and the sensitive personal data it processes on behalf of primarily its students and staff members, and also a wide range of other people who it works with and has contact with, including those who are part of or work with the Music Centre.

The University has been and is continuing to work hard to comply fully with the new General Data Protection Regulation (GDPR) which is enforceable from 25 May 2018. The GDPR makes a number of key changes to data protection law in the United Kingdom and within the European Union (EU) and potentially beyond the EU. More information on these changes, which include strengthening of some individual rights and some new individual rights can be found on The Information Commissioners' Office (ICO) website at: <https://ico.org.uk/>

The ICO will enforce compliance with the GDPR from 25 May 2018.

The University processes both personal data and sensitive personal data under a range of different 'lawful bases' depending on the nature of the respective 'processing purposes'.

For the 'personal data' of people engaging with the Music Centre, these 'lawful bases' include one or more of:

- Consent.
- Public task
- Legitimate interests; and
- Legal obligation.

In addition for sensitive personal data, the University processes under one or more of the 'lawful bases' conditions listed in Article 9(2) of the GDPR.

The 'purposes of the processing' range from sharing general updates, operational information and news about opportunities for involvement (such as for example music ensembles and community engagement projects), to opportunities to attend events and concerts, staff administration, to complying with legal obligations where the University is required to provide personal data under for example a subject access request (under The Data Protection Act 1998 - until 25 May 2018; and The General Data Protection Regulation - from 25 May 2018).

When communicating with key audiences such as people using the music centre and/or those who may wish to use it in the future, 'Legitimate interests' is a lawful basis used by the University for specific processing purposes in line with ICO guidance. Such 'Legitimate interests' for the processing include under the generally accepted three-part test for this 'lawful basis' as follows:

1. *Purpose test: are you pursuing a legitimate interest?* - The University has a legitimate interest in processing via the respective 'processing purposes' here the opportunities for students, alumni, staff and community members to engage with the music centre. In a wider sense, the University also has a legitimate interest in processing via the 'processing purposes' to achieve social bettering and transformation through education, and enable individuals to achieve their potential.
2. *Necessity test: is the processing necessary for that purpose?* - It is necessary for the University to process data for the purpose of: communicating with individuals (including students, alumni, staff and community members) using the music centre and/or those who may wish to use it in the future. We believe that there is no other realistic alternative which is as effective for interests including general updates (including marketing related ones) on developments with the music centre, and more widely as summarised in the 'purposes of the processing' paragraph above.
3. *Balancing test: do the individual's interests override the legitimate interest?"* - The University believes that people who engage with the music centre would reasonably expect the University to use their personal data in these ways, as summarised in the respective processing purposes. In addition, we do not believe that it would cause them unwarranted harm for the University to use their personal data in these ways, as summarised in the processing purposes.

Linked to its above mentioned 'processing purposes', the University processes a specific amount of personal data, which includes for example the names and contact details of people who engage with the music centre. Such processing enables them to keep themselves updated and indeed engaged with the University and music centre and with opportunities for involvement.

In certain specific circumstances and linked also to its above mentioned 'processing purposes' and where there is also an additional 'lawful basis' for this further processing, the University may process a specific amount of sensitive personal data. This is done in line with ICO guidance, and may include information about an individuals' health for example.

Sometimes the University has a requirement to share this information with groups of recipients. They include sharing details within the University.

Personal data and sensitive personal data will be kept for no longer than necessary, and these decisions will be made in line with legal requirements, the relevant University policies and in light of relevant best practices.

There are a number of individual rights available, and more information on these can be found at <https://ico.org.uk/> In particular in those circumstances and for those

processing purposes where your personal data is being processed under either of the 'lawful bases' of 'Public task' or of 'Legitimate interests', you have the 'right to object'.

If consent has been used as the lawful basis for a particular 'processing purpose', there is a right to withdraw consent (if applicable).

There is a right to lodge a complaint with a supervisory authority. This is the ICO, who can be contacted in various ways as listed at:

<https://ico.org.uk/global/contact-us/>

The majority of the personal data held by the University is obtained from the individual it relates to.

In some cases, individuals are under a statutory or contractual obligation to provide the personal data (if applicable, and if the personal data is collected from the individual it relates to).

We review and update (where necessary) this policy statement in line with current guidance and developments.

The data protection officer for the University is:

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The name and contact details of our organisation are:

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