

Parent/Guardian/Teacher/Adviser Privacy Statement

Throughout this Statement, “The University”, “we”, “our” and “us” refers to the Marketing, Recruitment & International Department of Swansea University (i.e. the Admissions Office, Student Recruitment Office, International Development Office etc.) and associated Colleges. “You”, “your” and/or “data subject” refers to parents/guardians/teachers/advisers of those that have expressed an interest in becoming a future student at the University (both during the enquiry stage and application stage).

This statement explains how the Recruitment and Admissions Sections within the Marketing, Recruitment & International Department of Swansea University will handle and use your personal data information during the recruitment and application process.

Collecting personal data from you will allow us to keep in touch with you in order to keep you informed of our activities and developments.

The following Statement will demonstrate how the University will specifically use your personal data.

We are committed to protecting your information and being transparent about the information we hold. If however you would like to read more about the University’s commitment to protecting your personal information and being transparent as a whole, please visit the [University Data Protection webpages](#).

Identity and Contact Details of the Data Controller?

Swansea University is the data controller and is committed to protecting the rights of students in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Contact Details of the Data Protection Officer

Swansea University has a Data Protection Officer who can be contacted through dataprotection@swansea.ac.uk

What information do we collect about you?

We will collect information about you in the course of our interaction with you as the parent/guardian/teacher/adviser of a future student, for example, when you enquire, request a prospectus, send an email, apply for accommodation and/or apply to attend an event with us (such as an Open Day).

Collection of information submitted via forms or via third party

- Contact details
- Name
- Title

How will your information be used?

During the recruitment and application process we will use your personal data for the purpose of keeping in touch with you in order to keep you informed of our activities and developments.

Purpose	Legal Basis and Justification
<p>Enquiries (or expressions of interest) made to the University will be used to create a record within our database, this allows us to guide you through the next stages of the process.</p>	<p>Justification By contacting us, you have expressed that you are the parent/guardian/teacher/adviser of a prospective student 'true enquirer' and wish to be informed of relevant information.</p> <p>Legal Basis as defined by GDPR The Data Subject has given consent to the processing.</p>
<p>Submitted applications made to the University Accommodation Office.</p>	<p>Justification By providing your contact details while submitting an application for accommodation we identify you are a parent/guardian/teacher/adviser of a future student during the time that they are 'true applicant'</p> <p>Legal Basis as defined by GDPR The Data Subject has given consent to the processing.</p>
<p>As a result of your application, we will also use:</p>	

<p>Communicating with you: Depending on the information that you have given communications may be sent by post, telephone (and mobile) or electronic means, principally by email.</p> <p>Should you receive any unwanted messages, you will be able to unsubscribe at any point from any of our emails.</p> <p>We may also utilise the business functionality of social media to communicate relevant information that will guide you through the process. <i>Please note: users of social media platforms should be able to amend preferences within the settings of each platform.</i></p> <p>You can also get in touch directly should you wish to update your preferences.</p>	<p>Justification For necessary communications in relation to your status as parent/guardian/teacher/adviser of a future student:</p> <p>Legal Basis as defined by GDPR The Data Subject has given consent to the processing.</p>
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<p>Additional events that we offer, such as Open Days, the Meet and Greet Service, Student/Teacher Conferences etc.</p>	<p>Justification All additional services offered by us will have a sign up method where consent will be required.</p> <p>Legal Basis as defined by GDPR The Data Subject has given consent to the processing.</p>
<p>Analysis and Profiling</p>	<p>Justification It is important for us to be able to use data for market research purposes to inform our future marketing activity and maintain market competitiveness. This is usually anonymised data to identify/analyse trends etc., however, personal data may be used also.</p> <p>Legal Basis as defined by GDPR Processing is necessary for the purposes of Legitimate Interests pursued by the controller or by a third party expect where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.</p> <p>Our specific legitimate interests are: It is important for the University to use data for market research purposes to inform its future marketing activity and maintain market competitiveness.</p>
<p>Covid-19 Test, Trace and Protect</p>	<p>Justification Ensuring the safety and security of the University, its people and facilities. We may share contact information with Public Health Wales, if required to do so for COVID test, trace and protect reasons.</p> <p>Legal Basis as defined by GDPR Processing is necessary where there is a legal or statutory requirement or whether the processing is necessary in the public interest.</p>

The legal basis as defined by the GDPR that we rely upon is to fulfil a future contract while you are identified as a 'true enquirer' and/or 'true applicant'

Definitions:-

<p>'True Enquirer'</p>	<p>an applicant is only a 'true enquirer' during the year that they have enquired, if they have not submitted an application by the end of enrolment period of that specific academic year, they are no longer a 'true enquirer' and will be invited to opt in to receive further communications. i.e. if an applicant has made an enquiry for the academic year 18/19, if they have not submitted an application by 15 October 2018, an invitation to opt in will be sent. If they decide not to opt in, their record will be amended to 'do not contact'. However, the personal data will still be stored in the CRM until the end of the retention period or instructed to remove</p>
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'True Applicant'	an applicant is only a 'true applicant' during the year that they have applied, if they have not enrolled by the end of the enrolment period of that specific academic year, they are no longer a 'true applicant' and will be invited to opt in to receive further communications. i.e. if an applicant has made an application for the academic year 18/19, if they have not submitted an application by 15 October 2018, an invitation to opt in will be sent. If they decide not to opt in, their record will be amended to 'do not contact'. However, the personal data will still be stored in the CRM until the end of the retention period or instructed to remove.
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What information do we receive from third parties?

We will not receive information from third parties.

Who receives your information?

Unless required by law, your data will not be shared with any organisations outside the University. However, where necessary, personal information will be shared in order to support and provide a service of the recruitment and admissions process.

This section outlines the major organisations and the most common circumstances in which we disclose information about students. Where this involves international transfer, information will only be transferred if it meets the conditions set down under Data Protection legislation and the General Data Protection Regulation (GDPR) legislation. Sources include, though are not limited to, the following:

Data we may share	Recipients
Enquiries (or expressions of data)	We may share your enquiry internally to the University college so that they can respond to your enquiry.
Personal Details	We will share your information with NHS Wales Test, Trace and Protect Service to support the contact tracing process when required.
Any other disclosures that the University makes will be in accordance with Data Protection Legislation and GDPR, and your interests will be considered.	

International Transfer of Your Information

We do not normally transfer any of your personal data outside the EU. Any transfers that do occur will be done in line with the GDPR.

How long will your information be held?

We will retain your personal information in line with our Retention Schedule. Click [here](#) for more details.

Security of your information

Data Protection legislation requires us to keep your information secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised access and disclosure. Only members of staff who need access to relevant parts or all of your information will be authorised to do so. Information about you in electronic form will be subject to

password and other security restrictions, while paper files will be stored in secure areas with controlled access.

Some processing may be undertaken on the University's behalf by an organisation contracted for that purpose. Organisations processing personal data on the University's behalf will be bound by a contractual obligation to process personal data in accordance with Data Protection legislation.

What are your rights?

You have a right to access your personal information, to object to the processing of your personal information, to rectify, to erase, to restrict and to port your personal information. If you have provided consent to the Swansea University to process any of your data then you also have a right to withdraw that consent. Please visit the University [Data Protection webpages](#) for further information in relation to your rights.

Any requests or objections should be made in writing to the University Data Protection Officer:-

Mrs Bev Buckley
University Compliance Officer (FOI/DP)
Vice-Chancellor's Office
Swansea University
Singleton Park
Swansea
SA2 8PP
Email: dataprotection@swansea.ac.uk

Updating your preferences

You will be able to update your preferences at any time on-line using the email address that you have used during the process of recruitment and admissions. The preferences form can be found [here](#).

Consequences of not providing the data when based on statutory or contractual requirement

The University will unfortunately not be able to process your application if you refuse to provide the necessary information when based on contract or statutory requirement.

How to make a complaint

If you are unhappy with the way in which your personal information has been processed you may in the first instance contact the University Data Protection Officer using the contact details above.

If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: -

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire, SK9
5AF
www.ico.org.uk

Your responsibilities

You have a responsibility to keep your personal details up-to-date. You are expected to treat this in a responsible and professional manner and are legally required to do this under data protection legislation, as well as any professional ethics or codes of conduct. If you are made aware of

personal information in confidence then you are expected to not tell anyone without the individual's consent, unless there are exceptional circumstances. You should also not seek to gain others' personal data if you are not entitled. Action will be considered for any person who breaches Data Protection Legislation or a duty of confidence.

The University has a range of data protection policies and procedures in place which can be found [here](#):

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