

London South Bank University Privacy Notice- for uploading of videos for the Festival of Success

Purpose of this Privacy Notice:

We, London South Bank University (LSBU) of 103 Borough Road, London, SE1 0AA telephone number: 020 7815 7815 are the data controller for personal data relating to you that we process.

This Privacy Notice explains how we will process your personal data. LSBU is registered as a data controller with the Information Commissioner's Office, our data controller registration is Z6533032 and our registration can be viewed at <https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>.

Amendments may be made to this Privacy Notice.

This Privacy Notice was last updated in May 2021.

Details of how the University complies with the General Data Protection Regulation (GDPR) and other data protection laws are set out in the Data Protection Policy which is available at

https://www.lsbu.ac.uk/_data/assets/pdf_file/0004/11686/university-data-protection-policy.pdf

To note - since 1 January 2021 and in a UK context, it is primarily the UK General Data Protection Regulation ('UK GDPR') which is applicable.

"Personal data" refers to information relating to a living, identifiable individual. It can also include "special categories of data", which is information about your racial or ethnic origin, religious or other beliefs, and physical or mental health, the processing of which is subject to strict requirements. Similarly, information about criminal convictions and offences is also subject to strict requirements.

"Processing" means any operation which we carry out on your personal data e.g. obtaining, storing, transferring, and deleting.

Your personal data

This Privacy Notice explains how we, London South Bank University ("LSBU"), use personal data from those data subjects who are voluntarily uploading videos for

LSBU's Festival of Success. Such data subjects for example may be students/LSBU staff members/alumni and supporters, who are uploading short celebratory videos to a new microsite which will then be accessed by students. The site will be open access and technically available to the public.

Who does this privacy notice cover?

This privacy notice covers personal data of those data subjects who are voluntarily uploading videos for LSBU's Festival of Success. Such data subjects for example may be students/LSBU staff members/alumni and supporters, who are uploading short celebratory videos to a new microsite which will then be accessed by students.

For other personal data processing, LSBU has a range of other privacy notices including for example:

- An *'Enquirers and Prospective Applicants Privacy Notice'*.
- An *'Applicant and Students Privacy Notice'*; and
- An *'Alumni and Supporters Privacy Notice'*.

These above mentioned privacy notices can all be found at:

<https://www.lsbu.ac.uk/footer/data-protection/privacy-notices>

What personal information do we collect?

The majority of the personal data that we hold is information provided to us by you. Categories of personal data which we hold are as follows:

• Personal identifiers - for the videos voluntarily being uploaded for LSBU's Festival of Success, there could be:

(a) personal data processed: including names, genders and other basic information and the content of the video including for example any opinions expressed and published; and

(b) 'Special category data' collected and voluntarily uploaded by the data subject for the video interviews: this could include for example data concerning health and/or personal data revealing racial or ethnic origin, as such data may be visible from the video images.

Why are we collecting your personal data/what are we doing with it (purposes)? What legal basis are we relying on for the processing?

We only process data for specified purposes and if it is justified in accordance with Data Protection Law. In general terms, we process your personal data for uploading of videos for the Festival of Success under the 'legal basis' (lawful basis) of 'consent' and for any 'special category data' (sensitive personal data) processed in such videos under the 'lawful basis' ('condition') of 'explicit consent'.

More specifically, these activities and the legal bases we rely on are:

Purpose	Legal basis
(a) <u>personal data processed</u> : including names, genders and other basic information and the content of the video including for example any opinions expressed and published; and	<u>Consent</u> - in terms of the consent statement data subjects see and agree to before you voluntarily upload your videos for the Festival of Success to a microsite to be accessed by students.
(b) <u>'Special category data'</u> collected and voluntarily uploaded by the data subject for the video interviews: this could include for example data concerning health and/or personal data revealing racial or ethnic origin, as such data may be visible from the video images.	<u>Explicit (express) consent</u> - included as part of the consent statement data subjects see and agree to before you voluntarily upload your videos for the Festival of Success to a microsite to be accessed by students.

There may be additional processing to the above, for example, when you access our website which uses cookies or when we take photos of our events and publish them. This is done on the basis of our policies and we will inform you about such processing at the time when the data is obtained or as soon as reasonably possible thereafter. Use of our websites, including our use of cookies, is covered by our website privacy notice: <http://www.lsbu.ac.uk/footer/privacy> , and <http://www.lsbu.ac.uk/footer/cookies>

When processing personal data of an enquirer or prospective applicant who is a child under 18 years of age, we will identify the risks and consequences of the processing, and put age appropriate safeguards in place including making sure they understand what they're consenting to if we rely on consent as a legal basis.

Do we use any automated decision making or profiling?

Automated individual decision-making means making a decision solely by automated means without any human involvement. Profiling means the processing of personal data to evaluate certain things about an individual. We may use automated or manual analyses including segmentation or profiling to link data together to send you communications which are relevant and timely, to identify opportunities which may be of interest to you and to avoid approaching you with opportunities which are not of interest and provide you with an experience which is appropriate for you. We will not make any significant decisions about you based solely on automated-decision making.

Who do we share your personal data with? What data do we share?

On occasion we may need to share your data internally and with third parties, including video data which will be stored on third party AWS cloud servers.

How are we protecting your personal data?

Your personal data is held securely on LSBU's CRM – 'Connect', and Digital Engagement Platforms – 'Gecko Engage', 'Protect', 'Capture', 'Visit' and 'Chat' hosted by Campus Management Corporation and Gecko Labs Limited respectively. The data is accessible by a limited number of LSBU staff who have restricted access with levels of security permissions. Where data is not held on our servers, we use systems that are secured cloud based, and password protected. The data housing and management systems are compliant with ISO 27001 which is the international standard that describes best practice for an ISMS (information security management system) this meets local and global security laws such as the NIS Directive and the GDPR. We ensure we have appropriate data sharing agreements in place before sharing your personal data with third parties. We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them. LSBU is committed to working in a transparent, ethical, responsible and honest way

Your rights as a data subject

As a data subject, you have the following rights in relation to your personal data processed by us:

- to gain access to your personal data;
- to rectify inaccuracies or where appropriate, given the purposes for which your data is processed, the right to have incomplete data completed;
- to have your personal data erased. This is a limited right which applies, among other circumstances, when the data is no longer required or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest;
- to object to the processing of your personal data for marketing purposes;
- to object to the processing of your personal data when such processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing;
- to restrict the processing of your personal data. This is a limited right which will apply in specific circumstances and for a limited period;
- to ask for the transfer of your data electronically to a third party; and
- to not have decisions with legal or similar effects made about you solely using automated processing (including profiling), unless certain exceptions apply.

How long is your personal data kept?

Personal data held within our CRM and Engagement Platforms will be kept until there is no longer a legal basis for holding it, until you object to the processing of your data or until you withdraw your consent.

If you ask us to delete your personal data, we will continue to maintain a core set of personal data comprising very brief information to ensure that we do not inadvertently contact you in future. Our retention schedules for applicants ('Student Records Retention Schedule') are publicly available and can be found here <http://www.lsbu.ac.uk/footer/foi/publication-scheme>

How can you maintain your personal data?

For these videos which are voluntarily uploaded by data subjects, you can withdraw your consent here by emailing: alumni@lsbu.ac.uk

Exercising your rights, queries and complaints

For more information on your rights, if you wish to exercise any right or for any queries you may have or if you wish to make a complaint, please contact our Data Protection and Information Compliance Officer: Joe Dilger - Data Protection and Information Compliance Officer. Address: London South Bank University, 103 Borough Road, London, SE1 0AA Email: dpa@lsbu.ac.uk.

Complaints to the Information Commissioner

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>

Document dated: 17 May 2021.
