

## PRIVACY NOTICE for GSA HALLS of RESIDENCE

### PRIVACY NOTICE DETAILS:

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Related policies and documents	Data Protection Policy
Benchmarking	n/a

## PRIVACY NOTICE FOR GSA Halls of Residence

### General Data Protection Regulation (GDPR) 2016

#### Purpose

This Privacy Notice is applicable to all applicants to GSA Halls, students with a tenancy agreement and students who have lived in and later moved from GSA Halls and outlines what personal data GSA Halls hold about you, how it is processed and who we share it with. It also explains your rights as a data subject.

If you have any questions relating to our use of your personal data, these should be referred in the first instance to our Data Protection Officer by emailing [DataProtection@gsa.ac.uk](mailto:DataProtection@gsa.ac.uk)

You have the right to lodge a formal complaint against GSA regarding data protection issues with the Information Commissioner's Office (<https://ico.org.uk/concerns/>).

#### 1. APPLICANTS TO GSA HALLS

In order for GSA Halls to respond to your enquiries and to process your application to live with us, we need to collect, hold and use your personal data.

If you make an application to stay at GSA Halls, the personal data collected is required to process your application.

Personal data collected for this purpose includes a transfer of information from our Academic Registry which includes:

- Name, postal address, email address, date of birth, gender and phone number
- Course information, offer status with GSA Admissions

With this information we will contact you to offer information about our Halls and inform you how you can apply for GSA Halls.

If you apply to stay with us, GSA Halls will then request and collect additional personal data required in order to communicate with you and assess your application for GSA Halls.

Personal data collected for this purpose will include:

- Nationality
- Emergency contact details
- Any other information relevant to your application for GSA Halls

## **Legal Basis for holding your personal data**

For the personal data GSA Halls hold and process about you, GSA by law, has to provide you with the legal basis under which it is being processed. This can be based on Consent, Performance of Contract, Public Interest, Vital Interest or Legitimate Interest.

### **I. Legitimate Interest**

If you make an application to stay at GSA Halls, it is in our legitimate interest that your personal data is processed in order to respond and give you an answer to your question.

### **II. Performance of Contract**

If you submit an application to stay at GSA Halls, your personal data is processed in order to assess whether you meet the selection criteria and can be made an offer of a place, in one of our residences, you would then be invited to enter into a tenancy agreement with GSA.

### **III. Consent**

GSA Halls require your consent to process your personal data, you will be asked to give consent when you apply for halls and again when you read and accept a tenancy agreement.

You can withdraw this consent in whole or part at any time. If you wish to withdraw your consent you will be asked to complete and return a Data Subject Consent Withdrawal form. GSA Halls administration will also explain the consequences of withdrawing your consent in any particular case.

## **Primary purposes of processing personal data**

Your personal data will be used by GSA Halls, for example, to answer any queries you have about your application to GSA Halls, to administer your application for GSA Halls; to allow GSA Halls to offer you a confirmation of address letter at any point during your tenancy; the compilation of GSA Halls statistics for both internal use and reporting to statutory and regulatory bodies.

At point of GSA Halls application your personal data will not be shared with any other GSA department.

GSA Halls strives to ensure that all personal data remain current and accurate. If you become aware of any incorrect information held by us, you should request that this is rectified by contacting GSA Halls administration via Accommodation Office.

## **Sharing of personal data with other organisations**

At GSA Halls we do not share any personal data as this is held at Academic Registry. If you have any questions relating to our use of your personal data by GSA, these should be referred in the first instance to our Data Protection Officer by emailing [DataProtection@gsa.ac.uk](mailto:DataProtection@gsa.ac.uk)

## **Sources of data**

GSA Halls receive personal data in several ways but it is primarily obtained direct from you, the data subject; information you've given to other members of GSA staff or from GSA Academic Registry via electronic transfer. For information on how Academic Registry hold and use your personal data, please refer to the GSA Academic Registry Privacy Notice on the GSA website at [www.gsa.ac.uk](http://www.gsa.ac.uk).

## **2. STUDENTS LIVING IN HALLS WITH TENANCY AGREEMENT**

### **What personal data do we hold about you?**

All students confirm their personal data when applying for GSA Halls. This may include what is known as Special Category data, otherwise referred to as sensitive personal information.

Personal data held in your GSA Halls student record will include:

- Full Name; date of birth; postal and email addresses; phone numbers; gender
- Nationality
- Student ID number
- Uploaded photograph
- Programme of study
- Financial information relating to your rent commitments
- Communications in respect to your tenancy
- Emergency contact information
- Any other relevant data relating to your GSA Halls

Special Category data will include:

- Health concerns which you choose to declare with us at point of application for GSA Halls

### **Legal Basis for holding your personal data**

For the personal data GSA Halls hold and process about you, GSA by law, has to provide you with the legal basis under which it is being processed. This can be based on Consent, Performance of Contract, Public Interest, Vital Interest or Legitimate Interest.

#### **I. Performance of Contract**

If you submit an application to stay at GSA, your personal data is processed in order to assess whether you meet the selection criteria and can be made an offer of a place, in one of our residences, you would then enter into a tenancy agreement with GSA.

#### **II. Consent**

GSA Halls require your consent to process your personal data, you will be asked to give consent when you apply for halls and again when you read and accept a tenancy agreement.

You can withdraw this consent in whole or part at any time. If you wish to withdraw your consent you will be asked to complete and return a Data Subject Consent Withdrawal form. GSA Halls administration will also explain the consequences of withdrawing your consent in any particular case.

### **Primary purposes of processing personal data**

Your personal data will be used by GSA Halls, for example, to keep your student halls record accurate; record information related to tenancy and rent, including all email correspondence we have with you, GSA Halls misconduct; the compilation of student statistics for both internal use and reporting to statutory and regulatory bodies;

Your personal data will be shared internally with:

- GSA Halls Administration will share with GSA Finance Office, in relation to payment of your rent and third party debt collection services if rent debt has to be referred
- GSA Halls Administration will issue the GSA Halls Reslife Team (pastoral care) who hold a fire list for Health & Safety purposes

### **Sharing of personal data with other organisations**

In order to fulfil our statutory or regulatory obligations, any personal data GSA Halls hold about you may be provided, without explicit consent, to organisations including but not limited to:

- Higher Education Statistics Agency (HESA)
  - It is a statutory obligation for GSA to provide data, including special category data, to HESA. The data is provided on the understanding that any subsequent publication of data leaves the data subjects totally anonymous. Full details on how HESA use student data can be found on their website at <https://www.hesa.ac.uk/about/regulation/data-protection/notices>

### **Sources of data**

GSA Halls receive personal data in several ways but primarily obtained directly from you (the data subject); provided by other members of GSA staff; or external partners where we have relevant agreements in place.

## **3. STUDENTS WHO HAVE CHECKED-OUT OF HALLS**

After you have completed a tenancy period at GSA Halls, GSA Halls will retain some of your personal data related to your time as a student living in halls for up to 6 years.

### **What personal data do we hold about you?**

What we hold will be determined by what type of data it is and the length of time that has passed since you were last lived with us. The GSA Estates Retention Schedule states what data is held and how long we hold it for. There is some data that is kept and this includes:

- Full Name; date of birth; postal and email addresses; phone numbers; gender
- Nationality
- Student ID number
- Uploaded photograph

- Programme of study
- Financial information relating to your rent commitments
- Communications in respect to your tenancy including dates/durations
- Emergency contact information
- Any other relevant data relating to your GSA Halls

### **Legal Basis for holding your personal data**

For the personal data GSA Halls hold and process about you, GSA by law, has to provide you with the legal basis under which it is being processed. This can be based on Consent, Performance of Contract, Public Interest, Vital Interest or Legitimate Interest.

#### **I. Performance of Contract**

When leaving GSA halls, GSA will continue to hold your personal data in order to fulfil continued obligations to you as part of the contract you have with us.

### **Sharing of personal data with other organisations**

GSA Halls will not share your personal data with other organisations without your consent.

### **Sources of data**

The personal data GSA Halls holds on former students remains static from the point you are no longer a tenant at GSA Halls. We do not process it unless requested by yourself or by a third party (with your consent).

## **4. GENERAL**

### **What you are responsible for?**

When you apply, you are asked to check that the data GSA Halls holds about you is current and accurate. It is your responsibility to ensure you inform us of subsequent changes, such as a change of name or address. You can do this by contacting GSA Halls administration [accommodation@gsa.ac.uk](mailto:accommodation@gsa.ac.uk) either by phone, email or in person.

When you apply you are asked to provide details of your emergency contact, that can be contacted if an emergency situation arose. If it is necessary to contact your emergency contact, the only details disclosed will relate to serious health or safety concerns. When you provide emergency contact details, it is your responsibility to inform them that they are your nominated contact for this purpose and you must inform us of any change to this contact.

### **Transfers outside the EEA**

GSA Halls will not transfer your personal data to third parties located in other countries, including some outside of the European Economic Area. All instances of overseas transfers of personal data are subject to appropriate technical safeguards and contractual provisions incorporating appropriate assurances to ensure the security of the data and full compliance with legislative and regulatory requirements.

### **Retention of your personal data**

GSA Halls will retain your personal data only as long as necessary for its purposes as set out in our Estates Retention Schedule. Please note, however, that even after termination of your relationship with GSA halls we may still need to retain your personal data to satisfy obligations to keep certain records for particular periods as applicable by law.

### **Profiling**

GSA Halls does not use profiling or automation to make any decisions relating to your GSA Halls allocation.

### **Security**

Under current GDPR provisions GSA must ensure that all personal data which we hold is kept securely and must attempt to ensure that it is not disclosed to any unauthorised third party, accidentally, carelessly, negligently or deliberately.

### **Your rights**

You have the right to request access to, copies of and rectification or erasure of personal data held by us and to object to processing.

In some circumstance you may have the right to object to the processing of your personal data, to request it is erased where it is no longer required for the stated purposes, or that inaccurate information about you is corrected. For more information about your rights see the Data Protection Policy.

To exercise these rights please contact the Director of Finance & Resources Data Protection Coordinator in the first instance – Alistair Storey – [A.Storey@gsa.ac.uk](mailto:A.Storey@gsa.ac.uk).

GSA's Data Protection Officer is Tom McDonnell – [DataProtection@gsa.ac.uk](mailto:DataProtection@gsa.ac.uk)

You have the right to lodge a complaint against GSA regarding data protection issues with the Information Commissioner's Office (<https://ico.org.uk/concerns/>).

### **Changes to this Privacy Notice**

If GSA Halls make any changes to this Privacy Notice you will be informed either by placing an alert on the homepage of the website or corresponding with you directly.