



Enquirers and Prospective Applicants Privacy Notice

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. However, the current version of this Privacy Notice can always be found at <http://www.lsbu.ac.uk/footer/data-protection/privacy-notices>. This Privacy Notice was last updated in May 2018.

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.

“**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

Our Enquirers, Prospects and Applicants are extremely important to us. This Privacy Notice explains how we, London South Bank University (“LSBU”), use personal data related to enquirers and prospective applicants interested in the services and products we offer.

Who does this privacy notice cover?

This privacy notice covers enquirers and prospective applicants to LSBU who have registered for an event, met a representative of the university at an external event, used a range of other digital and non-digital services or have consented to be contacted for further information about products and services offered by LSBU.

For other personal data processing related to applicants and students please see the Applicant and Student Privacy Notice at <http://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 – e.g. your name, gender, applicant/enquirer, date of birth.
- Contact details – e.g. your postal/email address, telephone number and contact preferences.
- Information about your subject of interest or course you have applied for – e.g. ‘Accounting’ or ‘BA Accounting and Finance’.
- Communications, engagements and interactions between LSBU and you in relation to outreach, recruitment and marketing activities.
- Information about your communications, engagements and interactions with LSBU – e.g. when you viewed an email, when we sent you a prospectus, that you attended an event, interacted with us on social media, clicked on a digital advert or when your account was created.

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 the

purposes of enhancing, informing, creating opportunity and offering guidance during the prospective student journey. More specifically, these activities and the legal bases we rely on are:

Purpose	Legal basis
<ul style="list-style-type: none"> • Sending you publications (e.g. magazines, email newsletters and life at LSBU). • Inviting you to events both on and off campus (e.g. open days, workshops, exhibitions, inductions, and mentoring programmes). • Informing you of benefits available to LSBU students. 	<p>Legitimate interests when sending you information related to your requests and enquiries, and when sending publications by post.</p> <p>Consent when sending you other related information through electronic means.</p>
<p>Contacting you via telephone or SMS by staff or current students to support you in your decision making.</p>	<p>Legitimate interests when responding with information related to your requests and enquiries.</p> <p>Consent when contacting you with other related information.</p>
<p>Administering events both on and off campus (e.g. open days, workshops, exhibitions, inductions, mentoring programmes).</p>	<p>Legitimate interests in order to administer events.</p>
<p>Analysis and research in order to improve our understanding of prospective students, both applicants and enquirers.</p>	<p>Legitimate interests in conducting analysis and research of the journey from enquirers through to students.</p>
<p>Internal record-keeping and administration (e.g. to process registrations for events).</p>	<p>Legitimate interests in administration and record-keeping.</p>
<p>Profiling your account in order to better target our communications to your needs and interests.</p>	<p>Legitimate interests in improving our methods of communicating with you.</p>

Where ask us to, we may process special category information (e.g. disabilities) in order to answer your requests or provide you with support and reasonable adjustments for you to participate in events etc.	Explicit consent.
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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. The following table lists what information we may share with whom.

Recipients	Data which we may share with them
Event providers.	Registration details, accessibility and assistance requirements and related information including dietary requirements.
Third party suppliers appointed by LSBU to provide analysis and research to link data together and to identify trends or forecasting – data will be anonymised.	Application details, Postcode, Town, City Contact details, Course and qualifications, engagement and interactions.
Data processors i.e. third parties who process personal data on our behalf e.g. software providers, event booking providers etc. (e.g. CRM suppliers, digital engagement solutions, telecommunication solutions).	Contact details and course information.

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>. We retain enquiry or non-applicant data for a period of 5 years which allows for tracking of prospect to applicant for the purpose of Research and Direct Marketing after this period data is deleted from the system CRM and Engagement Platforms.

How can you maintain your personal data?

You can update, amend, correct or unsubscribe the data we hold about you by visiting our preference centre which can be accessed from the link at the bottom of any email communication, by contacting the Digital Marketing Team at LSBU by email (lsbuCRM@lsbu.ac.uk), phone (020 7815 6729) or post. You can also change your communication preferences at any time to restrict how we process your data in our preference centre.

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:

Hywel Williams – 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/>.