

Third Parties and Visitors to Site Privacy Notice

1 General Information

We are committed to protecting the privacy and security of your personal information.

Under data protection law, we are a “data controller”. This means that we hold personal information about you, and are responsible for deciding how we store and use that personal information.

As a data controller, we are legally required to provide certain information to individuals whose personal information we collect, obtain, store and use. That information is contained in this document (our “privacy notice”).

The purpose of this notice is to promote transparency in the use of personal data, and to outline how Swansea University collects and uses personal data during and after your working or visiting relationship with us, in accordance with the General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018 (“DPA 2018”).

It is important that you read this document (together with any other privacy notices we may provide to you on specific occasions), so that you are aware of how and why we are using your personal information and the rights you have in relation to your personal information.

2 What Personal Information do we hold about you?

The following are examples of personal data which may be collected, stored and used:

- Personal contact details such as name, date of birth title, addresses, telephone numbers, and personal email addresses
- Marital status
- Gender
- Next of kin and nominated emergency contact information
- Employment records (including employer name, job title and working hours)
- CCTV footage and other information obtained through electronic means such as swipe/identity card records
- Information about your use of our information and communications systems
- Photographs
- Company name, company registration number and registered address
- Vehicle details including car registration number

3 What will we use your personal information for and what are our legal bases for doing so?

Personal data of third parties and visitors is typically collected through their University contact or through an event booking process, directly from the data subjects. Additional information may be collected from third party organisations including current third party employers. The University will also collect additional personal data throughout the period of you being on site at the University.

Purpose	Lawful Basis
Providing professional services and building client / customer relationships	Necessary for the performance of a contract / in order to take steps at the request of the data subject prior to entering into a contract Legitimate interest of the University to deliver a professional service to clients and relevant individuals

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Ensuring the safety and security of the University, its people and facilities	Compliance with a legal obligation
To support the NHS Wales Test, Trace Protect service in the event that the contact tracing process is initiated where it is in the public interest to ensure the safety of all of our staff, students and visitors on campus.	Compliance with a legal obligation / necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Registering you as a visitor to the University and issuing identity access cards to visitors of campus	Legitimate interest of maintaining security whilst allowing visitors access to university areas
To monitor your use of our information and communication systems to ensure compliance with the University's IT policies, where applicable	Legitimate interest of ensuring proper usage and network security of University IT systems
Providing visitor parking permits	Legitimate interest of the University to deliver a professional service to clients and relevant individuals
Business management and planning, including accounting and auditing	Compliance with a legal obligation and/or legitimate interest of sound management of the business of the University
To prevent fraud	Compliance with a legal obligation
For direct marketing purposes	Legitimate interest of the University to communicate to you relevant information (please note, the University will only communicate to you via electronic means if we have your specific consent to do so in line with the Privacy and Electronic Communications Regulations 2003)

Lawful basis for processing your Personal Data under the GDPR and DPA 2018

Personal data will only be processed when the law permits this to happen. Most commonly personal data will be processed in the following circumstances:

- Where you have given us your consent
- In order to fulfil Swansea University's obligations to you as part of your contract of employment.
- Where Swansea University needs to comply with a legal obligation (for example, the detection or prevention of crime and financial regulations)
- Where it is necessary for Swansea University's legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- To protect the vital interests of the data subject or of another person (for example, in the case of a medical emergency)
- In order to perform a task carried out in the public interest

Special Category Data

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We may only process special category personal data in the following circumstances where, in addition to a lawful basis for processing, there exists one of the following grounds:

- Explicit consent – where you have given us explicit consent.
- Legal obligation related to employment - The processing is necessary for a legal obligation in the field of employment and social security law or for a collective agreement.
- Vital interests - The processing is necessary in order to protect the vital interests of the individual or of another natural person where the data subject is physically or legally incapable of giving consent. This is typically limited to processing needed for medical emergencies.
- Not for profit bodies - The processing is carried out in the course of the legitimate activities of a not-for-profit body and only relates to members or related persons and the personal data is not disclosed outside that body without consent.
- Public information - The processing relates to personal data which is manifestly made public by the data subject.
- Legal claims - The processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.
- Substantial public interest - The processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law.
- Healthcare - The processing is necessary for healthcare purposes and is subject to suitable safeguards.
- Public health - The processing is necessary for public health purposes and is based on Union or Member State law.
- Archive - The processing is necessary for archiving, scientific or historical research purposes, or statistical purposes and is based on Union or Member State law. Member States can introduce additional conditions in relation to health, genetic, or biometric data.

In limited circumstances Swansea University may contact you for your written consent to the processing of particularly sensitive data. In such circumstances the University will provide you with full details of the information needed and the reason it is needed, so that you can consider whether you wish to give your consent.

Where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once the University has been notified that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. If the latter is the case we will inform you of this legitimate basis.

Swansea University will only use personal data for the purposes for which it was collected unless it is considered reasonable that it is needed for another purpose and the reason is compatible with the original purpose. If the University needs to use your personal data for an unrelated purpose, it will notify you and will explain the legal basis that permits it to do so. The University may process your personal data without your knowledge or consent, in compliance with this policy and procedure, where this is permitted by law.

7 Who do we share your information with?

Swansea University may share your personal data with third parties where required by law, where it is necessary to administer the working relationship with you or where there is another legitimate

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interest in so doing including, but not limited to, for joint appointments with other external organisations.

8 International Transfer of Your Information

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

9 How Long Do We Keep Your Information For?

To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we actually need it for the purposes we acquired it in the first place.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Personal data specifically collected for the purpose of the NHS Wales Test, Trace, Protect Service will be held for 21 days from the date of each separate visit made.

Please refer to our retention policy/schedule [<https://www.swansea.ac.uk/about-us/compliance/records-management/>] for further details

10 Individual rights

Data protection legislation provides individuals with a number of different rights in relation to their data. These are listed below and apply in certain circumstances:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

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- **Request data portability** of your personal information. In certain circumstances, you may have the right to require that we provide you with an electronic copy of your personal information either for your own use or so that you can share it with another organisation. Where this right applies, you can ask us, where feasible, to transmit your personal data directly to the other party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the University's Data Protection Officer via the information provided in the 'contact us' section below.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

11 Ability to withdraw consent

Where your personal data is processed on the basis of your consent or explicit consent, you have the right to withdraw your consent to the processing at any time. You can do this by emailing the Data Protection Officer at dataprotection@swansea.ac.uk. Any withdrawal of consent will not affect the lawfulness of any processing of your personal data based on consent before the withdrawal is notified.

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

The University will not be able to enrol you as a member of staff if you refuse to provide the necessary information when based on contract or statutory requirement.

13 Accuracy

If any of your personal details change during your engagement with the University you should contact a relevant member of staff to notify them and provide them with the updated accurate information.

14 Updates to this privacy policy

We review the ways we use your information regularly. In doing so, we may change what kind of information we collect, how we store it, who we share it with and how we act on it.

Consequently, we will need to change this privacy policy from time to time to keep it accurate and up-to-date.

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We will keep this policy under regular review to ensure it is accurate and kept up to date. This policy was last updated 13/8/2020.

15 About Us

Swansea University an institution established by Royal Charter of Singleton Park, Swansea, SA2 8PP

We are the data controller of the information you provide us with. The term “data controller” is a legal phrase used to describe the person or entity that controls the way information is used and processed.

16 Where to go if you want more information about your rights or to make a complaint

The Information Commissioner’s Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here http://www.ico.gov.uk/for_the_public.aspx.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. We will always do our very best to solve any problems you may have.

17 Contact us

You’re welcome to get in touch with us to discuss your information at any time.

We have appointed a [data protection officer (DPO)] to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO dataprotection@swansea.ac.uk