

# Enquirer Privacy Notice

## Introduction

Throughout this privacy notice, “University” “we”, “our” and “us” refers to the Norwich University of the Arts. “You” and “your” refers to people making enquiries about our services and goods.

Norwich University of the Arts is a registered data controller. We collect, hold and process personal information relating to your enquiries. This is essential for us to carry out your request for services and functions, and to manage our operations. We hold personal information and comply with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA).

You may also want to read other Norwich University of the Arts privacy notices. If you use our website, please read the website privacy notice. We do our utmost to protect your privacy. As such we have security systems and procedures to protect information from unauthorised disclosure, misuse, or destruction.

## What types of information we hold about you

Information held about you may include, but is not limited to:

- Your name and address
- Your email address
- Your telephone number
- Your date of birth (we ask for this due to our responsibility to ask for parental consent to provide information for anyone under the age of 13 years)
- Your email engagement data

The University may also collect and process ‘sensitive personal data’ under the DPA, and ‘special categories of data’ under the UK GDPR where an individual is attending an event and has provided us with personal information regarding any special requirements to enable their attendance, for example, due to a disability. It should be noted that the University will only hold this data for as long as necessary for the purpose it was provided, and this will ordinarily be destroyed after the event has taken place.

## How and why we collect this information

We collect and process your information to deliver the services and goods you have requested and to provide information about the University such as:

- Requesting a prospectus or course information
- Reserving a place on an open day
- Requesting an international student e-newsletter

Your data is provided to us when you request information directly or when you attend an event and request further details from us. Your data can also be provided to us by third party sources (such as a UCAS fair, international agent), who have obtained your consent.

The University complies with the provisions of the Data Protection Act 2018 which sits alongside the UK General Data Protection Regulation (UK GDPR). Article 6 of the UK GDPR defines six different lawful grounds for an organisation to be permitted to process personal data, and the University is legally obliged to determine and advise you of under which of the legal bases your personal data is processed. We rely on Article 6(1)(a), '*Consent*' as our legal basis which applies when you have given us your freely given, informed, specific consent. It is important to note that you have the right to withdraw that consent at any time, as detailed below.

As detailed previously in this Notice, the University may be required to collect and process some 'sensitive personal data' also known as 'special category personal data.' This would be where an individual is attending an event and has provided the University with personal information regarding any special requirements to enable their attendance, for example, due to a disability. The sharing of this kind of 'special category' personal information is strictly controlled and the data would ordinarily be destroyed after the event has taken place. The University's legal basis for processing this sensitive data under Article 6 of the UK GDPR is Article 6(1)(a), '*consent*' and, in addition, for sensitive data, the University is required to identify an appropriate lawful condition under Article 9 of the UK GDPR which is Article 9(2)(a) '*explicit consent*'.

In some circumstances, where you have made an enquiry through an overseas agent, your data will be processed outside of the EEA. In these cases, the University has provisions and safeguards in place to protect your information and ensure that it is managed in a manner which meets the appropriate high standards.

## **How we use your information**

We use your information so we can provide the service or goods you have requested. We may also communicate with you and provide other information that we believe you may be interested in. We ask your consent to do this. If you provide consent but later decide you want to withdraw this, you have the right to change your mind. Please see the section below "your rights."

Where we collect data about you using a webform, we will either advise you on the web form how this information will be handled, or we will direct you to the relevant Privacy Notice, depending on the types of information collected.

Our third-party CRM provider "Azorus" may use cookie-like technologies from time to time, like web beacons, SDKs, pixels and other tracking technologies. They automatically place single pixel gifs, also known as web beacons, in every email sent from Azorus. These are tiny graphic files that contain unique identifiers that enable the University and Azorus to recognise when our contacts have opened an email or clicked certain links. These technologies record each contact's email address, IP address, date, and time associated with each open and click for a campaign. Azorus uses this data to create reports for the University about how an email campaign performed and what actions the contacts took.

## Who we might share your information with

We work with organisations who help us to process data. Your details are held on a customer relationship management database. When you browse our website or complete one of our online forms your information is shared with Fasthosts and Word Press who help maintain the security and performance of our website. None of these companies will contact you directly. Some of these organisations are based outside of the UK and some data is stored outside of the European Economic Area (EEA) in Canada. However, as Canada is rated by the EU as 'adequate' for data security and privacy, we are satisfied that this meets the appropriate standards, to protect your personal data.

## How long we keep your information

We will keep your personal information only as long as is necessary to fulfil the purpose for which it was collected and in accordance with the University's records retention schedule. This means that, in normal circumstances, your data will be held for a period of three years beyond the date at which you have expressed an interest in joining the University. We feel this is necessary to meet our legitimate interests as it allows for changes in your circumstances e.g., if you choose to defer your application. After this period, we will anonymise your data to enable us to evaluate the effectiveness of our recruitment processes.

As detailed above, where the University has collected 'sensitive personal data' under the DPA, and 'special categories of data' under the UK GDPR for individuals attending events, this will ordinarily be destroyed after the relevant event has taken place.

## Your rights

You can manage the emails you receive from us by clicking on the preferences link at the end of any email you have received from us or email [info@nua.ac.uk](mailto:info@nua.ac.uk). You can use the same process if you wish to unsubscribe from receiving any further marketing or event information from us you.

Additionally, under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information (this is known as a Subject Access Request or SAR).
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate or incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact our Data Protection Officer, Sue White at [dataprotection@nua.ac.uk](mailto:dataprotection@nua.ac.uk) if you wish to make a request or have any queries.

If you believe your data has been breached, please speak to the University. The [Information Commissioners website](#) provides more information on data breach rights.

## **How to contact us**

If you require further information or have any concerns about how your personal information is held and processed by us, please email the University's Data Protection Officer, Sue White [dataprotection@nua.ac.uk](mailto:dataprotection@nua.ac.uk) or write to us at Data Protection Officer, Norwich University of the Arts, Francis House, 3 -7 Redwell St, Norwich NR2 4SN.

You can also complain to the ICO if you are unhappy with how we have used your data.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

ICO Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

## **Changes to this privacy notice**

We keep our privacy notices under regular review.

This privacy notice was last updated on 9 November 2022.