

## Purpose of this statement

Advance HE (“we”, “us”, “our” “**Advance HE**”), a company limited by guarantee incorporated in England and Wales under company number 4931031, and registered as a charity in England under charity number 1101607 and in Scotland under charity number SC043946, with its registered office at Innovation Way, York Science Park, York, YO10 5BR, is committed to protecting and respecting your privacy. We think it is extremely important to keep any personal information we have about our members and users of our online services secure and confidential.

This statement explains how we use, process and protect the information that you provide to us when using the online community space (the “**Community Space**”).

This statement (together with our [terms of use](#) applicable to the Community Space and [cookies policy](#), sets out the basis on which any personal information that we collect from you, or that you provide to us, will be processed by us.

## Information we may collect from you

We may collect the following personal information about you:

- Personal information required when signing up to the Community Space, such as your name and contact details, and employer/institution name.
- The profile picture of you that you may upload.
- Links to your professional networking details such as LinkedIn and Twitter.
- Any personal information you make available on the Community Space (including in any closed groups) and/or you provide in response to statements, assessments, surveys, feedback forms, questions, items or in comments and/or in relation to any content you may upload to the Community Space.
- Details which you are required or you choose to submit when using the Community Space including your login details, and (for example, and if requested) your chosen security questions and answers.
- Information stored using cookies used on the Community Space when you use the Community Space, if you have cookies enabled in your browser. Please see the Online Community cookies policy for further information regarding cookies available at <https://www.advance-he.ac.uk/advance-he-connect-cookies-policy>.
- Information logged automatically by computer servers from your browser, such as your IP address and the date and time of your visit.
- We may also record factual information whenever you contact us or use the Community Space, and keep records of other action we take, so we have a record of what happened.

## Information we receive from other sources

Invitations to register for the Community Space will be sent using personal data stored on our ‘MyAcademy’ system.

## Where we store your personal information

We are committed to holding your personal information securely.

Where your data and personal information are held electronically, it is currently held on a computer system that is owned and controlled by Advance HE. Advance HE uses Hivebrite (“**Hivebrite**”) which is a cloud based service whereby your data and personal information is held in the cloud or held by such other third party appointed by Advance HE. Please also see the section “Who else we may pass your information on to”.

Sometimes we may have to keep information about you on paper as well. Paper copies are held locally by Advance HE at its offices or securely by our staff or contractors. Sometimes we will make



electronic copies of paper documents or type up information from them. These documents or information are then stored on our computer system.

We also use computers (including laptops and other portable electronic devices) outside our offices if they are secure and under our control or the control of our staff or contractors.

Sometimes we may also use computers which are owned or managed by our suppliers, or our staff and contractors may use their own devices, if the computers are secure and under our control or the control of our staff or contractors.

When you use the Community Space, some information about you may be stored on the computer or device you are using. You can find out more about this by reading the cookies policy for the Online Community available here <https://www.advance-he.ac.uk/advance-he-connect-cookies-policy>.

All the information that you provide to us will be transmitted to and stored on Hivebrite, or our secure servers, or the secure servers of such other third party who we may appoint to host the Community Space and/or store information.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information we cannot guarantee the security of your data transmitted to the Community Space, our website, other online services that we provide, e-mail or other methods of communication that rely on telecommunications. As such, any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

### **What we use your personal information for**

- To provide you with access to the Community Space, and generally for communicating with you and providing services to you.
- Keeping in touch with you (for purposes connected with the Community Space and/or if you have consented to receive marketing information from us).
- Sending service information relating to the Community Space to you, to correspond with you and for you to be able to correspond with other users via the Community Space.
- For you to be able to look up, contact and/or share your details with other users including if you participate in closed groups. The default setting in relation to your profile on the Community Space is set so that all of your details can be viewed by other users. You will need to log in to the Community Space and edit your settings if you wish to amend your privacy settings.
- Applying and enforcing our standards, the terms of this statement and our terms of use of the Community Space.
- Telling you about any changes to this statement and enforcing its terms, and our terms of use for the Community Space.
- To fulfil any obligations to our member institutions, such as providing reports detailing the results of use by personnel from their institution, and other users, of the Community Space (but names will not be provided).

*Our lawful basis for the activities above is necessity to perform any contractual relationship with you and in all other circumstances, the pursuit of our legitimate interests of providing Advance HE members with membership services.*

- Prevention, detection and prosecution of crime, enforcement of our policies and our contracts and applicable terms of use with you and quality and standards management.
- Meeting our legal obligations including those owed to our regulators.



*Our lawful basis for the activities above is necessity for us to comply with our legal obligations.*

- Appointing third party service providers to use your personal data for our purposes (not the purposes of the third party) on our behalf and under our instruction, such as support services for use of and/or analysis of the Community Space.
- Administration purposes including establishing, amending, closing or renewing your user account for the Community Space.
- To deal with any complaints or queries relating to your use of the Community Space.
- Instructing our professional advisers and financial services providers, including insurers.

*Our lawful basis for the activities above is the pursuit of our legitimate interests for running our business, provision of administration and IT services and network security.*

- To better understand how users access the Community Space, both on an aggregate and individualised basis, in order to improve the Community Space and respond to users' desires and preferences.
- Generating reports for internal use by us and our staff, and generating reports as part of our services for institutions.

*Our lawful basis for the activities above is the pursuit of our legitimate interests to study how our members/contacts use the Community Space, to develop them, to operate and grow our business and to inform our marketing strategy.*

- Other purposes - we may anonymise your information so that it cannot be linked to you. In that case, we may use the data for any purpose.

## **Who else we may pass your information on to**

We will be the controller of the information that we obtain about you but there may be times when we disclose your details to others, as set out below.

- Other users who you choose to share your contact details with and other information you may make available on the Community Space.
- Our suppliers who provide services on our behalf such as IT providers, who own, manage or provide support for our computers, phones or systems we use. Such suppliers may contact you directly if you have a support query relating to our services (including the Community Space).
- To Hivebrite or any other third party appointed by Advance HE that we may use to host/store your data and personal information in order to provide the Community Space to you.
- Public relations firms that provide services to us, and other organisations that help us in printing and sending out our newsletters and marketing material.
- Our staff or individuals that we appoint to administer and/or analyse any comments you provide and other information that you create or upload via the Community Space, and to manage and administer our organisation and its operations.
- Regulators and law enforcers, for crime prevention or detection, risk assessment, resolution of complaints or other issues.
- Local authorities, regulators, Government departments and other public authorities, such as for preventing payment errors or fraud.
- Our partner organisations with whom we provide jointly branded or resourced services or events.
- Our professional advisers and financial services providers, including insurers, so that we can use their services.

If you tell us we cannot share information that might make it difficult or impossible for us and others to provide some services to you, and may affect our provision of services to you or your institution, it may mean that you can no longer access and/or use the Community Space.



We may sometimes be obliged to disclose your personal information by law such as by a regulator with appropriate power, or court order. Also, information held by or for public bodies can be subject to freedom of information.

We will not share your personal information with anyone who claims to represent you unless we are satisfied that you have appointed them or they act in some recognised official capacity. There may be a delay to us dealing with requests whilst we confirm the identity of the third party, or check that we have your approval to deal with them.

If we have your permission we will use your information to contact you for marketing purposes, and to permit selected third parties to use your information to contact you about themselves and their services. If you change your mind, you can contact us at the details below.

### **Links to other sites**

The Community Space may contain links to third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **How long we will retain your data for**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for (see “What we use your personal information for” above). 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; and
- the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Advance HE will ensure that our suppliers and selected third parties with whom we share your personal information in accordance with this statement will delete your personal information when they no longer require it.

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **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.
- **Request the transfer** of your personal information to another party.

You have the right to ask us not to process your personal information. However, we may be unable to provide our services to you if we are unable to record or process certain details. 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 our Data Protection Team at [data.protection@advance-he.ac.uk](mailto:data.protection@advance-he.ac.uk) or in writing.

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.

You have the right to complain to the Information Commissioner (<http://www.ico.gov.uk/>) if you have any concerns in respect of the handling of your personal information by Advance HE.

### **Changes to this Statement**

This statement may change. We will display the new statement in all places where it can usually be found, such as on our website, on the Community Space, and at our offices.

### **Contact details**

Questions about this statement can be sent to us at [Networks@advance-he.ac.uk](mailto:Networks@advance-he.ac.uk) or by telephone on 01904 717500 or by mail at:

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