

PRIVACY NOTICE FOR IMPERIAL COLLEGE UNION EVENTS

This Privacy Notice (**Notice**) explains how Imperial College Union (the **ICU, Union, we, our, us**) and all associated clubs process your personal data when you attend its events (including public lectures, demonstrations, competitions and online events such as webinars / public meetings and your rights in relation to the personal data we hold.

For the purposes of the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018, the Union is the data controller of your personal data. The Union has appointed a Data Protection Officer, who can be contacted via email at dpo@imperial.ac.uk, and via post at Imperial College London, Data Protection Officer, Faculty Building Level 4, London SW7 2AZ.

How your personal data is collected

The Union collects your personal data from the following sources:

- from you, typically when you:
 - complete forms in relation to attending or participating in an Event, including buying or registering for tickets online;
 - attend and participate in an Event;
 - interact with one of our representatives or employees during an Event (for example when you sign up to a mailing list or enter a competition);
 - complete our surveys and feedback forms;
 - communicate with us by post, email, online chat, social media, telephone or another format;
 - visit the Union's website ([We are Imperial College Union](#)), including when you search, register or use our online payment/ticketing portals or sign-up for an event.
- from third parties such as:
 - ticketing agencies who sell tickets or process ticket orders on our behalf;
 - a third party who may purchase tickets on your behalf or register your details with us;
 - our website, webinar, ticketing and sign-up platform providers;
 - our payment provider who will confirm details of your payment;
 - publicly available sources when researching and creating biographies of speakers and key attendees.

What categories of personal data are collected?

We collect the following categories of personal data:

Identification, background and contact details

- biographical information such as your name, title, gender and date of birth;
- your image, audio and likeness (as captured on a webinar, in photographs or on recordings we make of the Event, and on CCTV where the Event is hosted at our premises);
- your contact details including address, email address, online chat or social media account details and phone number;
- your qualifications, professional experience and institution or employer (where this is relevant to an Event);
- your student clubs or societies, affiliations and other connections with the Union (for example, where this is relevant to Alumni Events);

Online and transactional

- details collected via online Cookies, please see [Cookies | Imperial College Union](#) for more information.
- events that you have attended in the past or for which you are registered to attend in the future;
- payment details and your financial transactions in relation to Events;
- records of communications sent to you by the Union or received from you;

We may also collect the following special categories of personal data where it is necessary for the purposes set out in this Notice (please also see the section on *Special categories of personal data* for details about how we process this data):

- information concerning your health and medical conditions (e.g. disability and dietary needs);
- trade union membership number (for example, where membership provides you with access to (or a discount on) an Event);
- criminal acts caught on our CCTV cameras; and
- diversity information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation.

The basis for processing your data, how we use that data and with whom we share it

We will process your personal data either in ways you have consented to, or because it is otherwise necessary for a lawful purpose. We set these out as follows:

As part of the contractual relationship between you and the Union, for example in relation to a ticket you have purchased

In this respect we use your personal data for the following purposes:

- to deliver the Event you have registered for;

- to correspond with you about the Event, including sending you pre and post-event information.

As part of this process, we will expect to share your personal data with:

- our agents, contractors and service providers (including providers of accommodation, catering, IT, webinar and other support services) where applicable and where it is necessary for them to receive the information;
- our bank to whom payment details are provided in order to process a payment;
- co-organisers or partners who are involved in the delivery of an Event;
- relevant professional bodies or institutions where membership or affiliation affects your entitlement to attend (or results in a discount on) an Event.

Other legitimate interests

Your personal data will also be processed because it is necessary for the Union's legitimate interests or the legitimate interests of a third party. This will always be weighed against your rights, interests and expectations. Examples of where we process data for purposes that fall under legitimate interests include:

- creating biographies of attendees or a delegate or speaker list and distributing the biography/list to speakers and attendees (except in circumstances where it is appropriate to gain your consent);
- sharing your information with sponsors of an event (except in circumstances where it is appropriate to gain your consent);
- filming, photographing or otherwise recording Events and publishing such content on our website, social media accounts and other formats where it would not be necessary, appropriate or practicable to obtain your specific consent (for example, we may seek specific consent for prominent or impactful uses);
- analysing and improving the use of our website;
- analysing who is attending our Events, including so that we can monitor the success of our outreach programs and understand trends in participation (for example, by monitoring participation by socio-economic group);
- processing feedback to improve the quality of our Events and marketing activities;
- marketing the Union and its Events by post, telephone, social media and electronic mail (but without prejudice to your rights under the legislation that regulates the sending of marketing communications by electronic means);
- consulting our professional advisers where it is necessary for us to obtain their advice or assistance;

In addition to those organisations named above, we may also share your personal data with:

- Imperial College London – where it is necessary to the running of an event

- our agents and contractors where they require your personal data to perform the services outlined above; and
- direct mail agencies who assist the Union in the administration of marketing communications.

Legal obligations

Your personal data will be processed for compliance with the Union's legal obligations. For example:

- for the detection and prevention of crime and to assist the police and other competent authorities with investigations;
- to comply with tax legislation, safeguarding duties and subject access requests of others.

In this respect, as well as the organisations mentioned above, we may in specific circumstances need to share your personal data with third parties who have made legitimate requests under data protection or freedom of information law; the police and other law enforcement agencies; HMRC and the Union's external auditors.

Where you have consented

Your personal data will also be processed by the Union where we have your consent.

Examples where consent would be sought include where the law or some other protocol requires that the Union obtains your consent (for certain marketing or fundraising communications) or where, having balanced the Union's legitimate interests against your rights, interests and expectations, we feel it is appropriate to obtain your consent for our processing, rather than rely on the legitimate interests basis.

Where applicable, consent will always be specific and informed on your part, and the consequences of consenting or not, or of withdrawing consent, will be made clear.

Special categories of personal data

In addition to the above, we may process types of personal data that the law considers to fall into a special category (such as race, religion, health, sexual life or criminal record). This will be under the following circumstances:

- where you have provided your explicit consent. Examples might include where you have provided information on your dietary requirements, allergies or where you inform us of the requirement for wheelchair access;
- where such processing is necessary for the establishment, exercise or defence of legal claims (including sharing with the Union's insurers and legal advisers) or the prevention or detection of crime (for example, detecting criminal actions through the use of CCTV or reporting allegations to the police);

where it is in your vital interests to do so and you are incapable of giving consent, for example to inform your specified emergency contact, the NHS or emergency services in the event of your illness or other emergency.

International transfers of data

The Union will in limited circumstances disclose personal data to third parties, or allow personal data to be stored or handled, in countries outside the UK / European Economic Area. For example, we will transfer data to IT and ticketing/sign-up platform providers based overseas (such as MailChimp, Google and EventBrite) and share information with international co-organisers of an Event where applicable.

In these circumstances, your personal data will only be transferred where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law, such as:

- an approved certification mechanism.
- where the Union has entered into contractual clauses including the completion of an Internal Data Transfer Agreement and Transfer Risk Assessment.
- there exists another situation where the transfer is permitted under applicable law (for example, where we have your explicit consent).

Profiling

We may use personal characteristics such as age, role, your expressed interests, your previous interactions with the Union or geographical location to target our communications, and advertising and promotions so that they are relevant to you.

Your rights under the Data Protection Legislation

- to obtain access to, and copies of, the personal data we hold about you. Further information of how to make such an application can be found at <http://www.imperial.ac.uk/admin-services/legal-services-office/data-protection/subject-access-requests/> ;
- to require that we cease processing your personal data if the processing is causing you damage or distress;
- to require us not to send you marketing communications;
- to request that we erase your personal data;
- to request that we restrict our data processing activities in relation to your personal data;
- to receive from us the personal data we hold about you, which you have provided to us, in a reasonable format specified by you, including for the purpose of transmitting that personal data to another data controller; and
- to require us to correct the personal data we hold about you if it is incorrect.

Please note that the above rights are not absolute, and requests may be refused where exceptions apply.

If you have any questions about these rights or how your personal data is used by us, you should contact the Data Protection Officer using the details below:

- Post – Data Protection Officer

Address - Level 4 Faculty Building, Imperial College London, South Kensington, London, SW7 2AZ

- Email – dpo@imperial.ac.uk

If you are not satisfied with how your personal data is used by the Union you can make a complaint to the Information Commissioner (www.ico.org.uk).

How long is my personal information retained for?

The Union's Retention Schedule (which is maintained by the Imperial College's Archives and Corporate Records Unit) sets out the relevant retention period, or the criteria that should be used to determine the retention period – the Retention Schedule is available at: [Imperial College London Retention Schedule](#)

Where there is any uncertainty with respect to data retention, staff should consult either the ICU Systems Team or the College's Data Protection Officer.

In addition, we hold information on participants for up to three months after an Event unless we have a legitimate reason for retaining your information for longer; for example, where you have requested to receive further information from us and to keep you informed about future Events.

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