

## 1. Data Controller

**University of Northumbria at Newcastle** processes personal data in accordance with our obligations under the General Data Protection Regulations ('GDPR') and is a registered Data Controller with the Information Commissioner's Office ('ICO'), which is the supervisory authority responsible for the oversight and enforcement of Data Protection Legislation within the United Kingdom.

**Registration Number:** Z7674926

## 2. Overview

This privacy notice is a statement that describes how and why Northumbria University Library processes ('collects', 'uses', 'retains', 'discloses', 'disposes of') the personal data of our external users as defined in table 2 of the University Library's ['Membership and Access policy'](#).

This notice also explains how you can control how we use your information in accordance with your rights under relevant data protection legislation.

## 3. Where does the University Library get your personal data from?

As an external user you provide data to us directly as part of your registration as a library user and through your ongoing relationship with us, including via emails, telephone or web enquiries or in person at Ask4Help service points.

For collaborative ventures students we may also obtain information directly from the University student records system (SITS). For students at third party Universities who are part of the SCONUL (Society of College National and University Libraries) Access scheme we may also obtain data from the SCONUL Access database.

## 4. Categories of personal data which are processed by the University Library

To carry out our activities and to manage our relationship with you, we may collect, store, and process the following categories of personal data:

Data Category	Example
<b>Biographical</b>	Name, title, student number, birth date, age and gender.
<b>Contact Details</b>	Addresses, telephone numbers, email address etc.
<b>Administrative</b>	Enquiry and correspondence records, course and dates, home institution, library usage history.
<b>Financial</b>	Banking or card information to facilitate fine payments.
<b>Special category ("Sensitive") Personal Data</b>	Data concerning your health (e.g. relevant disability, relevant health issues needed to ensure your health and safety on campus or access etc)

### 5. Activities we process your personal data for and the lawful basis

Under Article 6 EU GDPR we must identify a basis for the "Lawfulness of processing" of our activities involving of your data. These are broadly described as: 'Consent', 'Contract', 'Legal Obligation', 'Vital Interests', 'Public Interest (or Public Task)' and 'legitimate interests'.

Data is required for the following activities, which have been identified as necessary *"for the performance of our contract with you"* or in the case of potential partners, *"in order to take steps prior to entering into a contract"*.

- Provision of access to library buildings.
- Registration, provision of and administration of the use of library services, for example borrowing and requesting items.
- Provision of access to online services and resources.
- Response to enquiries and requests for support or resources.
- Continuous enhancement and improvement of Library services.

Data is also processed for the following activities, which have been identified as necessary *"for us to comply with the law"*:

- For monitoring compliance with and enforcement of relevant policies in relation to health and safety and security (prevention and detection of crime) - including the use of CCTV, and safeguarding.

We may also process your personal data because it is necessary for our *"legitimate interests or the legitimate interests of a third party"*:

- For research and statistical analysis and to monitor and evaluate our performance and effectiveness;
- To seek advice on our rights and obligations, such as where we require our own legal advice;
- In relation to the "establishment, exercise or defence of legal claims" or "whenever courts are acting in their judicial capacity";
- For the recovery of outstanding debts owed to the University;
- For the purposes of the development of the Library collection if you suggest the trial or purchase of a resource.

### 6. Sharing your Personal Data with Third Parties

- We may provide information about your use of our library to your home institution.
- Your feedback may be used anonymously for marketing purposes.
- We may share your information with the University Finance department if your Library account is in arrears for an extended period of time.

### 7. Transfers to third party countries

Some of our IT services are hosted by organisations who may back up their data to locations based in third party countries. Where data is shared with third party countries, we ensure that these countries are either approved by the European Commission as having 'adequate protection' or we put in place 'appropriate safeguards' and contracts with these organisations, so as to maintain the security of the data and your rights under relevant Data Protection legislation.

There may also be limited sharing with organisations based in third countries for specific events, or where the nature of our relationship requires such sharing, for example as part of our global research partnerships .

### 8. How personal data is stored securely by Northumbria University

We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

All of our employees, contractors and volunteers with access to personal data receive mandatory data protection training and have a contractual responsibility to maintain confidentiality and access to your data is restricted to those members of staff who have a requirement to access it.

The University utilises many different storage solutions and IT systems, some of which are outsourced to third party providers. For example, email accounts are provided by the Microsoft Live@Edu service.

Where processing takes place with an external third party, processing takes place under an appropriate agreement outlining their responsibilities to ensure that processing is compliant with the Data Protection legislation and verified to be secure.

Where applicable, any credit/debit card details provided will be stored in full compliance with PCI-DSS requirements.

### 9. How long personal data held by Northumbria University

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Your data is held in compliance with Northumbria University's [retention schedule](#), which is published on our [website](#). This can be summarised as:

Where we have had an ongoing relationship, we will keep your data for up to 6 years after the end of the relationship for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than if required to do so for legal reasons, or for limited research or statistical purposes for which it will be anonymised. If we do, we will make sure that your privacy is protected and only use it for those purposes.

### 10. Your Rights under GDPR

Under the GDPR, you have [a number of rights](#) in relation to the processing of your personal information, each of which may apply to differing degrees' dependent upon the nature of the processing and the legal basis for it. You have the right to:

- [Be informed as to how we use your data \(via this privacy notice\)](#)
- [Request access \(a copy\) of the personal information that we hold about you.](#)
- [Correct inaccurate or incomplete data](#)
- [Request that we stop sending you direct marketing communications.](#)

In certain circumstances, you may also have the right to:

- [Ask to have certain data 'erased by us.](#)
- [Request that we restrict certain processing of your personal data.](#)
- [Request that we provide any data you submitted to us electronically be returned to you or passed to a third party as a data file.](#)
- [Object to certain processing of your personal data by us](#)

In some cases, there may be specific exemptions as to why we aren't able to comply with some of the above. Where this is the case, we will explain the reasons why.

- For more information about any of the above please see the [GDPR pages of our website](#).

In order to exercise any of the above rights, please contact the Data Protection Officer (*details below*).

### 11. Data Protection Officer

The Data Protection Officer (DPO) for Northumbria University is Duncan James. Contact the DPO if you would like to:

- Receive a copy of your data.
- Have any questions you feel have not been covered by this Privacy Notice

## Library External Users Privacy Notice



- Have any concerns about the processing of your data
- Wish to make a complaint about the processing of your data

You can email at [dp.officer@northumbria.ac.uk](mailto:dp.officer@northumbria.ac.uk) or call +44 (0)191 243 7357

### 12. Lodging a Complaint with the Information Commissioners Office (ICO)

If you are dissatisfied with our processing of your data, or a response to a complaint you have made to us about it, you have the right to complain to the ICO.

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113 (local rate) or 01625 545 745

For more information see [Information Commissioner's web site](#).

### 13. Changes to this privacy notice

We keep this privacy notice under regular review and will communicate any significant updates to you. This privacy notice was last updated in May 2018 and will be reviewed annually.