

## 1. Data Controller

The University of Northumbria at Newcastle (“we”, “our”, “us”) is registered as a Data Controller (Registration Number: **Z7674926**) with the Information Commissioners Office for the purpose of processing personal data. We are committed to processing personal data in accordance with our obligations under the (GDPR) and related UK data protection legislation.

## 2. Overview

We use the Enlitened app (“Enlitened”) to engage with Students (“you”, “your”) and ask you questions about your studies, your life and your wellbeing. It also enables you to share ideas with us and other students. Responses are processed to create a profile about you, to identify how you are doing, and to help use to help you to get the most from your time at Northumbria. This notice describes how we process personal data in relation to your use of Enlitened.

## 3. Where does the Enlitened app get your personal data from?

- Your contact information and educational details will be uploaded by the University for registering you with Enlitened to enable your on-boarding when you download it.
- Via transactional activities as part of your use and engagement with Enlitened, for example, when using Enlitened, we will ask you a series of questions and record your answers which generates data about you (see ‘use of profiling’ below).

## 4. Categories of personal data we process

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

- Contact data: full name, University email address, student ID, Enlitened username.
- Education data: course of study, level of study (undergraduate or postgraduate), mode of study (full time or part time), fee status, faculty, course start date, year group.
- Accommodation data: where the accommodation is managed by the university
- Demographic data: gender and age group,
- Details of contact data and Enlitened usage data, technical data
- Expressions of opinion provided by you

Enlitened will process the Special Category Personal data under this privacy notice in the form of data related to your health and wellbeing.

## 5. The lawful basis for Processing

We will only process your personal data for legitimate purposes and where we are permitted to do so under one of the following lawful bases:

- The University is a public authority with an obligation to undertake research and deliver teaching activities. We may collect and use data (but not engage with you) for analytics purposed under our ‘Public Task’.

- Archiving, scientific or historical research purposes or statistical purposes: We may process special category data for research as part of our public task.
- We ask for your explicit consent to process your data in order to engage with you directly and make interventions on your behalf. You will always be asked to provide consent if you wish to participate in any process that enables you to receive tailored advice about how you can enhance your learning. Where we rely on consent this will be made clear to you and you are free to decide whether to provide this data and there are no consequences if you choose not to provide it and you may continue to use Enlitened without any further contact from us.
- We may process data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests).

### 6. Activities we process personal data for

We may process your Personal Data for the following purposes:

| Activity                          | Description   |
|-----------------------------------|---|
| <b>Enlitened Registration</b>     | <ul style="list-style-type: none"> <li>• Contact, Education and Accommodation data is used to register you</li> <li>• You will be asked for consent for Demographic data to be used.</li> <li>• You will be asked for a username, which may be published against any ideas or comments you leave. We recommend your username is not your real name, nor one which can indirectly identify you.</li> </ul>   |
| <b>Communications</b>             | <ul style="list-style-type: none"> <li>• We periodically send you emails or push notification when there are new questions to answer, new recommended content, updates to your ideas and similar service updates for you on Enlitened.</li> <li>• You can opt out of these communications via links in the messages or by using the settings in Enlitened</li> </ul>  |
| <b>Ideas, voting and comments</b> | <ul style="list-style-type: none"> <li>• You can share ideas with us and other students or comment and vote on existing ideas.</li> <li>• Comments and ideas are published under your username, or you can post anonymously.</li> </ul>   |
| <b>General app usage data</b>     | <ul style="list-style-type: none"> <li>• Enlitened collects analytics data on your app usage, including the times you use Enlitened, your clicks, screen views and browsing habits.</li> <li>• Unique device IDs may also sometimes be collected and used as an additional security measure if you've logged in to more than one device.</li> <li>• IP addresses may also sometimes be collected.</li> <li>• Where possible, any personal data will be pseudonymised or fully anonymised for reporting purposes.</li> </ul> |
| <b>Rewards</b>                    | <ul style="list-style-type: none"> <li>• Enlitened usage is translated into coins which you can redeem for rewards.</li> <li>• No personal data is shared, but Enlitened will track which discounts and offers you use and use this data to tailor future offers and rewards to you.</li> </ul>   |
| <b>Aggregated reporting</b>       | <ul style="list-style-type: none"> <li>• Aggregated anonymised reports will combine data from all students to inform us on how students are doing overall.</li> </ul>   |

### 7. Use of Profiling

The Enlitened app tracks your wellbeing by asking you questions on a regular basis. The responses you provide help to create a profile about you and identify how you are doing at university against several key indicators:

- Learning experience – how you feel about the academic side of your life.
- Feeling connected – how you feel about Northumbria, your relationships and community.
- Wellbeing – how you feel about your wellbeing.
- Overall engagement – combining the above.

Profiling will be used to make decisions in a number of areas

- Deciding which questions to ask next
- Recommending content to you.
- Deciding when to send emails and/or push notifications.
- Updating aggregated anonymous reporting and trends.

### **8. Sharing your Personal Data with Third Parties**

Enlitened is provide by 'The Student Room Group Ltd' who act as a data processor on our behalf. 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.

We may share information with Legal Advisors or insurance companies where we have a legal obligation to do so.

Information may be shared with the police or emergency services where it is deemed to be in your vital interests or where we have a legal obligation to do so.

### **9. How personal data is stored securely**

'The Student Room Group Ltd' (The Student Room) and the University 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.

The Student Room use Amazon Web Services, Google and Microsoft Data Storage who store data within the European Economic Area.

All 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 members of staff who have a requirement to access it.

### **10. Transfers to countries outside of the European Economic Area (EEA)**

Some Partners and IT services providers are based in countries outside of the EEA. We only transfer data to outside the EEA where "appropriate safeguards" are put in place through contract, where the European Commission has agreed that data protection provisions of a country offer adequate levels of protection.

Enlitened utilises 'Braze' push notifications, Firebase Analytics tracker and Datadog technical system monitoring platform. These are based in the United States and the transfer of data is covered by the EU-US Privacy Shield.

### **11. How long personal data held for?**

## Enlitened Privacy Notice

We will retain your identifiable personal data (responses to questions, profiling outcomes and app usage data) for as long as it is required to fulfil the purpose for which it is held and then to fulfil any legal requirements. This will usually be up to 1 month after you complete your studies, unless you request the deletion of all your personal data in the Enlitened system.

We may keep data outside of Enlitened for longer, if:

- Required to do so for legal reasons.
- For research for purposes related to student support and teaching and learning enhancement. Data used for this purpose will be retained for 3 years.

We will make sure that your privacy is protected and will only use it for those purposes.

### 12. 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 order to exercise any of the above rights, please contact the Data Protection Officer. For more information about any of the above please see the [GDPR pages of our website](#).

### 13. Data Protection Officer

The Data Protection Officer (DPO) for Northumbria University can be contacted via email at [dp.officer@northumbria.ac.uk](mailto:dp.officer@northumbria.ac.uk) or you can call +44 (0)191 243 7357

### 14. 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, and Telephone: 0303 123 1113 (local rate) or 01625 545 745 Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

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