

Accommodation Privacy Notice

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 General Data Protection Regulation (GDPR) and related UK data protection legislation.

2. Overview

This privacy notice describes how and why we collect, use, store, disclosure, deletion or retain personal data in relation any individual (“you”, “your”) submitting enquiries and/or applications to the University accommodation department and when you take out a contract in our halls or residence.

3. Where do we get your personal data from?

- We may obtain personal data direct from you when you submit an accommodation enquiry and/or application via telephone, email, online forms or social media.
- Via transactional activities as part of your application (correspondence) or as part of your living in our residence (including CCTV footage and swipe card entry).
- From other University departments where relevant, including Security, Student Support and Wellbeing, Student Progress, Finance or your Faculty.
- From third parties assisting you with your accommodation application
- With your sponsors or funding body, for example the Student Loans Company.
- From relevant external authorities dealing with emergency situations or notifying us of any alleged criminal activities that we need to be aware of.
- From our third party accommodation management partner Sodexo Living.

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:

- Your name, Student Number, photograph held on file, your home address, other contact details, date of birth, gender, nationality, country of birth.
- Details of your study (Course, year, location)
- Details of your financial arrangements, for example, your personal bank details or details of your sponsor (these are not shared with third parties).
- Building entry times and dates.
- Details of any disciplinary issues and outcomes that affect your accommodation contract.
- Details of CCTV images.
- As part of the room self-selection system, you may provide some information about you to see if you share common interests with others to help your selection. Your identifiable information will not be visible, but you may provide generic categories such as; Gym Goer, Night Owl, Gamer etc

Special Category Data

- Health information that has been provided to the University and that you consent to be used to consider room allocation or at times when you require assistance or support.
- Information may be provided by you in relation to your religious beliefs or your ethnicity with your consent if required.
- Details of any relevant criminal convictions or allegations that might be required to consider your application or that come to light during your contract that may affect your status and/or require restrictions to be put in place.

5. The lawful basis for Processing

The University relies on the following legal bases to process information about you:

- **Consent:** We may rely on your consent to send some correspondence in relation to University events, services and products or to process your data in relation to specific services. Consent can be withdrawn at any time.
- **Contract:** Processing your application to accommodation is considered “processing in order to enter into that contract” – once you accept your place in accommodation the processing will be “under condition of contract”.
- **Legal Obligation:** We process some data because there is a legal obligation to (e.g. UKVI) or because we are required to provide equality monitoring statistics.
- **Public Task:** We process data for internal reporting, monitoring, and research as part of our public tasks.
- **Legitimate Interests:** Where to do so and it does not unduly prejudice your rights and freedoms, we may process data for internal reporting and planning or to communicate marketing messages to you promoting our services, courses and events.
- **Defence of Legal Claims: In the event of any legal claims,** processing of data may be necessary for the establishment, exercise or defence of legal claims.
- **Vital Interests:** We may process your information (including special category data) if it is considered to be in your vital interest or the vital interest of others and where we are unable to obtain your consent.

Special Category Processing

- **Explicit Consent:** We may rely on your explicit consent to process Special category data in relation to specific services. Consent can be withdrawn at any time.
- **Substantial Public Interest:** Where we are processing data about criminal convictions or considering Fitness to Practice issues, including health. We may also process data in order to assist the prevention or detection of crime or the apprehension and prosecution of offenders, for example through use of CCTV.
- **Archiving, scientific or historical research purposes or statistical purposes:** We may process special category data for research as part of our public tasks.

6. Activities we process personal data for

Data is processed for the following purposes:

- Logging and corresponding to you about accommodation related enquiries.
- Processing your request for referral to partners Unite, Liberty Living or Portland Green.

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- Administering your application and corresponding with you in relation to the application to University owned accommodation and to deliver services.
- Managing the allocation of rooms and considering any specific needs or requirements you have (including health, religious or dietary related)
- To liaise with other areas of the University and Sodexo Living to provide you with support or access to services during your contract.
- Taking payment for rent.
- Facilitate the postal service provided by the University.
- To record, investigate and administer complaints.
- To record, investigate and administer any disciplinary or misconduct issues that arise during the term of your contract.
- To comply with our duty of care and to safeguard our students and staff.
- To monitor compliance with the Equality Act 2010 and reporting and to fulfil any legal obligations to provide data to statutory bodies such as the Higher Education Statistics Agency (HESA).
- To invite you to participate in student focus groups, customer satisfaction surveys or to be involved in our marketing activities.

Communications

All communication with you will, where possible, be made via your registered preferred method of communication. E.g. via email, post, telephone, text (SMS), social media. We will contact you in relation to issues that affect you or your accommodation and about services or events that we believe are relevant to you.

If, at any stage, you are concerned about the content (e.g. unwanted marketing), frequency (too many) or method (change preference) of communications, you can unsubscribe or update your preferences using links provided at the bottom of the relevant correspondence.

7. 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.

We utilise many different storage solutions and IT systems, some of which are outsourced to third party providers or our partner Sodexo Living. 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.

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.

8. Sharing your Personal Data with Third Parties

Referrals to Partners

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- We will pass on your contact details to our nominated private accommodation partners Unite Students ([website](#)) Liberty Living ([Website](#)) or Portland Green ([Website](#)) where you have asked us to make a referral on your behalf. They will then become data controller for your information as part of your relationship with them.

Student in Accommodation

- Any representative that you have appointed to assist with your application.
- Information will be made available to our third party accommodation management partner Sodexo Living for the purpose of delivering services to you. Sodexo Living will not share your information with any third parties.
- If requested by local authorities, we may share information for council tax assessment purposes or electoral purposes.
- Where appropriate to do so, we may share information with the emergency services
- If you become a debtor to us, we may use external agents of the University (solicitors, debt recovery agents, tribunals and Courts).
- To the University's insurers, external auditors and external regulators such as the Health and Safety Executive or solicitors for the purpose of any investigations relating to accidents or incidents within the accommodation.
- Government agencies and authorities, including the police and security services for the prevention and detection of crime, apprehension and prosecution of offenders, the collection of tax or duty and safeguarding national security.
- To our insurance providers to provide insurance for your property whilst in accommodation.
- Any other disclosures that may be required but not listed above will be in accordance with your rights and the requirements of the GDPR.

Parents and/or Guardians

Information held about you **will not** be disclosed to your parents and/or guardians without your consent, unless your life or health is threatened, in which case if it is judged to be in your "vital interests", we may contact your emergency contact.

9. Transfers to countries outside of the European Economic Area (EEA)

Some IT services providers are based in countries outside of the EEA. The university will only transfer data to outside the EEA where satisfied that both the party which handles the data and the country it is processing it in provide adequate safeguards for personal privacy. 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 ensure that we have 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.

10. How long personal data held by Northumbria University

We will retain your personal data for as long as it is required to fulfil the purpose for which it is held and then to fulfil any legal requirements. Details of the retention periods for each type of processing activity is detailed in our retention schedule which is available on our [website here](#). This can be summarised as:

- Enquiry records will be kept for 3 years so support any subsequent application.

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- Unsuccessful applicant's data will be retained for 1 year following the completion of your application.
- Successful applicant data will be classed as 'Student data' where 'Core Information' (used to provide your transcripts, certificates, replacement certificates, validate your studies at any time in the future) is retained for 80 years.

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

11. 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](#).

12. Data Protection Officer

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

13. 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

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