

1. Introduction and Data Controller

The University of Northumbria at Newcastle ("we", "our", "us") is registered with the Information Commissioners Office as a Data Controller - Registration Number <u>Z7674926</u>. We are committed to processing personal data in accordance with our obligations under the UK General Data Protection Regulation (GDPR) and related UK data protection Act 2018.

This privacy notice describes how and why we process personal data in relation to **individuals** who use the Northumbria University live chat agent via the corporate website ("you", "your") for the purpose of assisting with enquiries, and explains how you can control the processing of your data or exercise your rights under the GDPR.

2. Why do we process your Personal Data?

We may collect your data when you enquire through the live chat feature on our corporate website. The amount of data we collect depends on how you interact with the chat. We collect your personal data:

- Pre-chat form submission We collect non-personally identifiable information via
 the required pre-chat form to enable our agents to provide targeted support for your
 specific enquiry. This data is linked to your conversation record and must be
 completed to access the live chat service, as our agents cannot answer your
 questions without this information.
- Live chat interaction Data is collected during your engagement with the live chat service. All chat conversations are automatically transcribed and stored. Any personal information you choose to disclose during the conversation will be captured within the transcript. The transcript data may be used for:
 - Investigation and resolution of complaints To provide accurate transcripts for investigating and resolving any complaints that may arise from chat interactions.
 - Service quality monitoring and training To support agent training and monitor our service quality standards through review of chat transcripts.
 - Follow-up enquiry management To reference previous conversations when handling subsequent enquiries from the same individual (this is only possible when the optional post-chat form has been completed, which links identifiable information to the chat record).

If you wish to avoid the collection of identifiable personal data, please refrain from sharing such information during the chat session.

Please always refrain from sharing special category data via chat, including but not limited to political opinions, religious beliefs, sexual orientation, or criminal history.

You will have the option to download your chat transcript directly from the widget at the end of your conversation.



- Post-chat form submission We collect personal data if you choose to complete the
 optional post-chat form. This form captures personally identifiable information that will
 be linked to your conversation record, and is used to reference previous enquiries
 when assisting with follow-up enquiries.
 - If you do not complete this form:
 - Your personal data will not be connected to the conversation record
 - Any personal information you share during the chat conversation will still be retained in the chat transcript
 - We will be unable to follow up on your enquiry as your contact details will not have been captured
- **Feedback form submission** Non-identifiable data is collected if you complete the feedback form. This information is used to assess chat service effectiveness and identify areas for operational improvement through user feedback evaluation.

3. Categories of Personal Data and Lawful basis for processing

Personal data, or personal information, means any information about an individual from which that person can be identified. To carry out our activities and to manage our relationship with you, we may collect, store, and process the following categories of data:

In accordance with the General Data Protection Regulation (GDPR), we may collect and process the following categories of data about you, under the legal basis of legitimate interests Article 6(1)(f) – Legitimate interests

In order to best support you during a live chat, we may collect, store, and process the following categories of data:

Mandatory Data (Pre-chat form and chat conversation)	
Interest	Subject area
Interest	Level of study, Year of entry
Biographical	Enquirer type
Declaration	I have read and understood the privacy policy declaration
Analytical +	Transcript, conversation duration
Training	• •

The following personal data may be processed under Article 6(1)(a) - Consent, should you choose to provide it.

Personal data, or personal information, means any information about an individual from which that person can be identified. To carry out our activities and to manage our relationship with you, we may collect, store, and process the following categories of data (please note this form is optional):



Optional Data (post-Chat Form and Feedback form)	
Biographical	First Name, Last Name, Nationality
-	
Contact Details	Email
Analytical	Satisfaction rating, free text review
Permissions	Communication Opt-in

We advise individuals not to include special category data (e.g. health, ethnicity, religious beliefs) when submitting information through this service. If such data is nonetheless provided, we will not further process it unless there is a lawful and necessary reason to do so, in line with the UK GDPR and the Data Protection Act 2018. Where applicable, processing will be limited to what is strictly necessary and may rely on conditions such as substantial public interest or legal obligation.

4. How do we keep your Personal Data Secure?

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. We limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

5. How Long will your Personal Data be Held?

We will retain your personal data for as long as it is required to fulfil the purpose for which it is held.

Conversation Records will be kept for 1 year from the end of the academic year in which the conversation took place.

During this period, your data will be used to:

- Help agents assist with your enquiries
- Investigate and resolve complaints
- Support agent training
- Monitor service quality standards through analytical reports
- Reference previous conversations for follow-up enquiries (if post-chat form completed)

6. What Are Your Rights Under GDPR

GDPR provides individuals a number of rights in relation to the processing of personal data, each of which may apply to differing degrees, depending 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:

Corporate Website, Live Chat Privacy Notice



- 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

7. Data Protection Officer (DPO) Contact Details

Our Data Protection Officer is Duncan James. To exercise your rights, or if you wish to raise a concern about our processing of your data, please contact the DPO on +44 (0)191 243 7357 or via email at dp.officer@northumbria.ac.uk.

8. 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, you have the right to complain to the ICO via Telephone: 0303 123 1113 (local rate) or 01625 545 745, via email: casework@ico.org.uk or for more information see Information Commissioner's web site.