

University of Hull and Hull University Union

Data Sharing Agreement

1. Overview and purpose

- 1.1 This Data Sharing Agreement links into the Relationship Agreement between the University of Hull ('the University') and Hull University Union ('HUU'). The Agreement governs the provision of students' personal information by the University to HUU and explains the purposes for which that information may be used.
- 1.2 The University and HUU are responsible for the provision of services and support to the University's students. In order to ensure the effective delivery and evaluation of these services it is necessary to share limited personal information about students. The University's Registration Documentation, which is made available at enrolment, informs students of the information that will be shared. Students may refuse consent for their personal information to be shared by opting out of becoming a member of HUU when they enrol.
- 1.3 This Agreement relates to all routine sharing of personal data. Ad hoc requests and responses for personal information or similar statistical data which are not detailed in this Agreement must be made under the authority of the University's Registrar and HUU's Chief Executive as appropriate.
- 1.4 The University and HUU are both registered as Data Controllers with the Information Commissioner's Office (ICO) and each organisation will retain full 'ownership' of their own data. However, any shared data is subject to the requirements of this Agreement as well as the Data Protection Act 1998.

2. Personal information to be shared

- 2.1 The University will share the following information for enrolled students:

- Student number
- Student forename
- Student surname
- Course name
- Method of student
- Student status
- Nationality
- Domicile
- Gender
- Date of birth
- Year of course
- Faculty
- University email
- Home address 1

- Home address 2
- Home address 3
- Home address 4
- Home postcode
- Term address 1
- Term address 2
- Term address 3
- Term address 4
- Term postcode
- Mobile phone number
- Other phone
- Private email
- Campus
- User ID

3. The purposes for which the personal information will be processed

3.1 HUU will process the personal information for the following purposes only:

- The administration of their clubs and societies.
- The marketing of services provided directly by HUU. Students will be able to opt out from receiving these communications. Only approved third party suppliers will be allowed to communicate with HUU members and all their communications will have approval by HUU before transmission. HUU's current third party supplier is BAM.
- The administration of elections.
- The administration of student representation on University committees, panels, boards and other representative bodies.
- Verification of student identity.
- Communication between Sports Clubs and Societies.
- Generation of demographic reports.

4. Provision of information

- 4.1 Student information will be provided by the University via a secure electronic transfer on a daily basis. The transfer will ensure that HUU hold the most up-to-date information and ensure that the details of any student who opts out of the data sharing agreement are removed without delay.
- 4.2 The medium term plan will be for the data to be downloaded automatically into the website server but until then the data will be available to Kevin Pearson, Interim Finance Manager or in his absence Rachel Kirby, Marketing and Communications Manager who will process the information.

5. Restrictions on the use of information

- 5.1 The information provided by the University to HUU shall not be passed to any third party including, without the express consent of the individual(s) concerned, except under the following conditions:
- 5.1.1 Where HUU has obtained the specific permission from the Registrar on behalf of the University.
 - 5.1.2 Where the information is shared with Softlayer who will provide the software and host the HUU database. HUU shall ensure that Softlayer is contractually prohibited from using the data for any other purpose and has security policies and procedures that ensure compliance with Principle 7 of the Data Protection Act 1998.
 - 5.1.3 Where the information is shared with DigitalOcean, Inc. who will provide the software and host the HUU database. HUU shall ensure that DigitalOcean, Inc. is contractually prohibited from using the data for any other purpose and has security policies and procedures that ensure compliance with Principle 7 of the Data Protection Act 1998.
- 5.1. Where the information is shared with CardSave Community (Subsidiary of WorldPay UK Ltd.) for payments for clubs, societies and event tickets. HUU shall ensure that CardSave Community (Subsidiary of WorldPay UK Ltd.) is contractually prohibited from using the data for any other purpose and has security policies and procedures that ensure compliance with Principle 7 of the Data Protection Act 1998. Data will not be transferred outside the EU.
- 5.2 The information provided by the University to HUU shall not, without the express consent of the individual concerned, be used for the purpose of marketing services provided by organisations or individuals other than HUU.
- 5.3 Information sent to students shall relate directly to the operational activities of HUU or to products and services provided by the Union or third parties (see 3.1) which are of genuine benefit to students.
- 5.4 Students shall be given the option in each mailing to opt out of future mailings and their personal dashboard can be set to opt out of information of their choosing.
- 5.5 HUU shall maintain a mechanism for students to opt out of having their personal information being processed by HUU at any time.

6. Security of Information

- 6.1. Appropriate security will be used to ensure the security of information. HUU data will be stored on a separate server protected by firewalls and up to date anti-virus software. There will be SSL on all pages, remote PCI and vulnerability scanning, minimum password strength and password changing policy.

6.2. Access to data will be controlled through a defined administrator hierarchy which gives staff access only to the data which they need to undertake their roles. For example the Student Activities Co-ordinator will have access to society members' information.

6.3. Printing of data will be kept to an absolute minimum and any printed personal data will be stored in a secure location.

7. Retention of personal data

7.1 Personal data which is shared will only be retained for as long as is necessary for the purposes specified in 3.1 of this Agreement. Data which is no longer required will be disposed of securely. Data which does not identify individual students can be retained for as long as may be required. This will be for 5 years after they cease to be a student. After 3 years the address field will be removed leaving only first and last name and telephone number. Data will be held on a secure encrypted hard drive.

7.2 Transactions from our online store will be retained for 6 years as a statutory requirement.

8 Individuals' rights and subject access requests

8.1 The Data Protection Act 1998 provides specific rights to individuals, including the right of subject access to personal data held about them.

8.2 Subject Access Requests should be made in writing and submitted to dataprotection@hull.ac.uk (for the University) or hullstudent@hull.ac.uk (for the HUU).

9 Complaints and data security breaches

9.1 HUU should notify the University within one working day of receiving a complaint or query regarding the processing of shared personal data or becoming aware of a data security breach.

10 Freedom of information and public access requests

10.1 The Freedom of Information Act 2000 provides a right of public access to information held by the University. Any requests sent to HUU by members of the public regarding shared data should be referred to the relevant University within two working days.

11 Review and publication

11.1 This Agreement will be reviewed formally as part of the Relationship Agreement every five years. Informal annual reviews will check that the objectives of the agreement are being achieved and recommend changes to the data requirements if necessary.

11.2 This Agreement will be published on the University and HUU websites.

Approved by

Signed Valerie Berry

Name J. BERRY

Position CEO

On Behalf of HUU

Signed Kamran Strachan

Name J. STRACHAN

Position Registrar & Secretary

On behalf of the University of Hull

Date 3/11/15

