



Computer Science Society

Data Protection Policy

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Purpose: Set out the approach to Data Protection Act 2018. The goal is to ensure we take a principle-based approach to protecting individual's data and members understand the responsibilities placed on individuals and the organisation.

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1. Introduction

- 1.1. Computer Science Society of City University of London (CSS@CUoL) is a society registered under City University of London Student Union.
- 1.2. CSS@CUoL is committed to all aspects of data protection and takes seriously its duties, and the duties of any committee members, under the Data Protection Act 2018 (UK GDPR). The purpose of this policy is to set out:
 - I. How the organisation deals with personal data.
 - II. The principles under which data will be processed by the organisation.
 - III. The expectations the organisation has on its committee in relation to their individual responsibilities regarding the processing of data.

2. Definitions

- 2.1. All definitions may be of any capitalization, retaining the same meaning. For example, "User" and "user".
- 2.2. All definitions may be shifted into possessive form, retaining the same meaning. For instance, "They" and "Their".
- 2.3. "User", "Subject" or "Individual" collectively refer to any person who accesses, uses, or interacts with the services, content, or events provided by CSS@CUoL, whose personal data is being processed.
- 2.4. "CSS@CUoL" refers to Computer Science Society of City University of London, under the Student Union at City University of London.
- 2.5. "Society" or "Organisation" refers to Computer Science Society of City University of London, under the Student Union at City University of London.
- 2.6. "Event" refers to any gathering, activity, or function organised or facilitated by CSS@CUoL, and hosted on its website. This may include, but is not limited to, webinars, workshops, conferences, and other interactive online sessions.
- 2.7. "Committee Member" refers to an active participant of the committee of CSS@CUoL.
- 2.8. "Ticket" refers to a formal document that serves as evidence of a right or entitlement. It could be for various things e.g. entry to an event. Each ticket is assigned to an individual, for a specific event, for which the individual receives the outlined entitlements described.
- 2.9. "SU" refers to Student Union at City University of London.
- 2.10. "Personal data" is any information that relates to an individual who can be identified from that information. Identified/identifiable means you can distinguish one individual from a group of others with the most common means being a name. The UK GDPR sets out a non-exhaustive list of identifiers including:
 - I. Name
 - II. Identification number e.g. Student ID number or and employee number.
 - III. Location data e.g. an address on a database.
 - IV. An online identifier e.g. a username.
- 2.11. "Special category data" is personal data that needs more protection because it is sensitive. To process special category data a lawful basis under Article 6 of the UK GDPR and a separate condition for processing under Article 9 must be identified. The nine categories are:
 - I. Personal data revealing racial or ethnic origin.

- II. Personal data revealing political opinions.
 - III. Personal data revealing religious or philosophical beliefs.
 - IV. Personal data revealing trade union membership.
 - V. Genetic data.
 - VI. Biometric data (where used for identification purposes).
 - VII. Data concerning health.
 - VIII. Data concerning a person's sex life.
 - IX. Data concerning a person's sexual orientation.
- 2.12. "Processing" is any use that is made of data, including collecting, storing, amending, disclosing, or destroying it. There must be a valid lawful basis to process personal data from the six available lawful bases. This basis needs to be determined before any processing of data takes place and recorded on our GDPR Audit Log.

3. The Law

- 3.1. The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR) and replaced the Data Protection Act 1998.
- 3.2. GDPR sets out the key principles, rights, and obligations for most processing of personal data in the UK, except for law enforcement and intelligence agencies.

4. Data Protection Principles

- 4.1. Under the GDPR, the data protection principles set out the main responsibilities for organisations. These principles require that personal data shall be:
 - I. Processed lawfully, fairly and in a transparent manner.
 - II. Collected only for specified, explicit and legitimate purposes and not processed in a manner that is incompatible with those purposes.
 - III. Adequate, relevant, and limited to what is necessary in relation to the purposes of processing.
 - IV. Accurate and kept up to date, where necessary, with all reasonable steps taken to ensure that inaccurate data is rectified without delay.
 - V. Kept only for the period necessary for processing.
 - VI. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing, and accidental loss, destruction, or damage.
- 4.2. Note, these are separate to the lawful bases for processing and the individual rights.

5. Information Collection

- 5.1. Anonymised Usage Collection: CSS@CUoL collects anonymized website usage data, including but not limited to page views, clicks, referral sources, interaction heatmap, and anonymized geographical regions. This data, collected on the legal basis of legitimate interest, serves to understand user behaviour, improve the website, and gather quantitative analytical data, which may be shared with third parties.
- 5.2. Mailing List: Individuals may voluntarily enrol in a mailing list or event waitlist using their email address. This data collection is based on explicit consent. Users remain enrolled until

they choose to unsubscribe from the feed, facilitated by an "unsubscribe" button in every email. Alternatively, individuals can contact CSS@CUoL to be removed from the mailing list (See Section 14.1).

- 5.3. Ticketing: Personal data is collected during the ticket registration process, including name, email address, and any other identifiable information necessary for the event. This data collection is based on explicit consent and legal obligations for Health & Safety during the event. After six months after event date, personal data related to the tickets are anonymized for analytical purposes to enhance future events.
- 5.4. Additional Features: Certain website features may allow individuals to consent to additional features with the use of a checkbox, clearly disclosing how the data will be used and distributed with third parties.
- 5.5. Sponsors: Contact information is collected through a form for sponsor engagement, based on explicit consent. Sponsor information, such as tier and logo, is stored and displayed in accordance with any signed contractual relationship.

6. Cookies

- 6.1. CSS@CUoL may use cookies on its website. Cookies are small text files placed on majority modern devices to collect standard internet log information and visitor behaviour information. This information is used to track website activity and to improve user experience. As an individual, you can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. However, this may prevent you from taking full advantage of the website.

7. Data Retention

- 7.1. CSS@CUoL retains anonymized website usage data for a reasonable period to conduct analysis and improve website performance.
- 7.2. Data from the mailing list is retained until the individual unsubscribes. This ensures compliance with the explicit consent granted by the user.
- 7.3. Information collected during the ticketing process is retained for six months post-event. After this period, the data is anonymized and utilized for statistical purposes to enhance future events.
- 7.4. Contact information collected for sponsor engagement is retained for communication purposes and until all contractual relationships have elapsed.

8. Third-Party Data Sharing

- 8.1. Anonymized usage data may be shared with third-party analytics providers or sponsors.
- 8.2. Personal information, where disclosed and consented by the user, is shared with sponsors on a legal contracted basis.
- 8.3. Disclosure may also occur if required by law, Student Union, University, to authorities to protect the safety of others or to protect our right.

9. Privacy Notices

- 9.1. CSS@CUoL tells individuals the reasons for processing their personal data, how it uses such data and the basis for processing the data in its privacy notice. It will not process personal data of individuals for other reasons.
- 9.2. Where a user gives consent to any additional feature with outlined data measures, CSS@CUoL will only process personal data for the reasons specified.

10. Individual Rights

- 10.1. As a data subject, individuals have several rights in relation to their personal data as follows:
- 10.2. Subject Access Requests (SAR)
 - I. Individuals have the right to make a subject access request. If an individual makes a subject access request, CSS@CUoL will tell them:
 - a. Whether or not their data is processed and if so why, the categories of personal data concerned and the source of the data if it is not collected from the individual.
 - b. To whom their data is or may be disclosed, including to recipients located outside the UK and the safeguards that apply to such transfers.
 - c. For how long their personal data is stored (or how that period is decided).
 - d. Their rights to rectification or erasure of data, or to restrict or object to processing.
 - e. Their right to complain to the Information Commissioner's Office (ICO) if they think the organisation has failed to comply with their data protection rights.
 - f. Whether or not the organisation carries out automated decision-making and the logic involved in any such decision-making.
 - II. The organisation will also provide the individual with a copy of the personal data undergoing processing. This will normally be in electronic form if the individual has made a request electronically unless they agree otherwise.
 - III. An individual can make a SAR verbally or in writing via email. The request must be treated as valid if the individual is asking for their own personal data. In some cases, we may need to ask for proof of identification before a request can be processed. For additional support, please read the Subject Access Request guide.
 - IV. The organisation will normally respond to a request within a period of one month from the date it is received. In some cases, such as where large amounts of the individual's data are being processed, it may respond within three months of the date the request is received. CSS@CUoL will write to the individual within one month of receiving the original request to tell them if this is the case.
 - V. If a subject access request is manifestly unfounded or excessive, CSS@CUoL is not obliged to comply with it. A subject access request is likely to be manifestly unfounded or excessive where it repeats a request to which the organisation has already responded. If an individual submits a request that is unfounded or excessive, the organisation will notify them that this is the case and whether it will respond to it.

10.3. Other Rights

Individuals have several other rights in relation to their personal data. They can require the organisation to:

- I. Rectify inaccurate data.
- II. Stop processing or erase data that is no longer necessary for the purposes of processing.
- III. Stop processing or erase data if the individual's interests override the organisation's legitimate grounds for processing data (where the organisation relies on its legitimate interests as a reason for processing data).
- IV. Stop processing or erase data if processing is unlawful.
- V. Stop processing data for a period if data is inaccurate or if there is a dispute about whether the individual's interests override the organisation's legitimate grounds for processing data.

10.4. To ask the organisation to take any of these steps, the individual should send an email to computersciencesociety@city.ac.uk

11. Data Security

11.1. CSS@CUoL takes the security of personal data seriously. The organisation has the following controls in place to protect data against loss, accidental destruction, misuse, or disclosure, and to ensure that data is not accessed, except by authorised committee members or SU staff in the proper performance of their duties.

11.2. Training

Individuals whose roles require access to personal data, or who are responsible for implementing this policy or responding to subject access requests under this policy, will receive GDPR training to help them understand their duties and how to comply with them.

11.3. Impact Assessments

Some of the processing that the organisation carries out may result in risks to privacy. Where processing would result in a high risk to individual's rights and freedoms, the organisation will carry out a data protection impact assessment to determine the necessity and proportionality of processing. This will include considering the purposes for which the activity is carried out, the risks for individuals and the measures that can be put in place to mitigate those risks.

11.4. Third Party Processing

Where the organisation engages third parties to process personal data on its behalf, such parties do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

12. Data Breaches

12.1. If the organisation discovers that there has been a breach of personal data that poses a risk to the rights and freedoms of individuals, it will report it to the ICO within 72 hours of discovery. The organisation will record all data breaches regardless of their effect.

- 12.2. If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.

13. Children's Privacy

- 13.1. This website is not intended for individuals under 18 years old. CSS@CUoL does not knowingly collect personal information from anyone under the age of 18.

14. Changes to This Policy

- 14.1. We may update this Privacy Policy periodically. For minor changes, we may not inform the individual; therefore, we recommend checking for updates periodically. The individual will be informed if any major changes occur that significantly impact their data.

15. Contact

- 15.1. If you have any questions about this Privacy Policy, please contact CSS@CUoL at computersciencesociety@city.ac.uk.
- 15.2. If you are unable to reach the CSS@CUoL Committee President, email the University Student Union at studentsunion@city.ac.uk, stating "Computer Science Society Privacy Policy Enquiry".