



# GDPR PROVISION

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# About this provision

When considering GDPR in relation to OneVoice it is important to understand the relationship between OneVoice, NUS and your Students' Union.

In the context of GDPR both the Students' Union and NUS are considered Data Controllers using the UnionCloud platform provided by OneVoice, making OneVoice the Data Processor.

OneVoice only processes student data to provide services to you. Student data will only be sent to NUS if the user has agreed (via opt-in consent) for their information to be shared with NUS.

To assist your Union in meeting its obligations under GDPR18 we have updated the consent fields for the Union with the following;

- ▶ consent to send communications e.g. your weekly updates to all students,
- ▶ consent to send marketing emails e.g. club offers and drinks promotions,
- ▶ mandatory acceptance of terms and conditions,
- ▶ all checkboxes are unchecked unless you pass consent information as part of your upload of students.

To ensure you can meet obligations under the 1994 Education Act elections can still be participated in by those who haven't agreed terms and conditions for general processing.

# GDPR Provision / Principles

This table lists all the features and activities OneVoice provides and does to assist in your Students' Union meeting its GDPR18 obligations. We have also highlighted how you should use UnionCloud in a compliant way. This does not however constitute legal advice nor provides an exhaustive list of GDPR-related activity required to be compliant.

GDPR Principle	OneVoice / UnionCloud		Your Students' Union
	Will Do	Will Provide	Must
<i>a) processed lawfully, fairly and in a transparent manner in relation to individuals</i>	<p>OneVoice acts only as a Data Processor in this relationship</p> <p>NUS will process data only based on consent from a student</p> <p>NUS moves data to its own separate data warehouse to which a student has consented</p>	<p>Checkboxes on registration and profile page to confirm consent</p> <p>Terms and conditions accepted pre-usage of using UnionCloud for all areas, excluding elections</p> <p>Ability to set these based on consent gained elsewhere e.g. University registration</p> <p>Access to this information through API, CSV download and admin interface</p> <p>Dynamic UserGroups to see all students under a specific age where DOB is provided by the University</p>	<p>Respect these permissions when processing the data outside of the UnionCloud platform</p> <p>Be aware consent can only be given by over 16 year olds (this is subject to Parliamentary approval)</p>
<i>b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes</i>	<p>Require permission explicitly for any processing</p> <p>Publish our data protection policy</p>	<p>Default privacy statement that can be edited within the UnionCloud interface</p> <p>Published webpage that combines your Students' Union edited/replaced privacy statement with the OneVoice general information</p> <p>Provision to upload and autolink your Students' Union data protection policy</p>	<p>Review and amend / re-write the Students' Union part of the privacy statement</p> <p>Link this webpage appropriately from within your CMS. Suggest via the footer on all pages</p> <p>Provide a data protection policy and upload it</p> <p>Consider implications of any additional questions asked and stored as part of registration</p>

# GDPR Provision / Principles

GDPR Principle	OneVoice / UnionCloud		Your Students' Union
	Will Do	Will Provide	Must
<i>c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed</i>	<p>Prepare and publish general privacy statement covering OneVoice activity that articulates the purpose</p> <p>Only process data related to this purpose</p> <p>Only enable storing of data related to our customers purpose</p>		<p>Review and then amend or re-write the Students' Union part of the privacy statement</p> <p>Ensure any features your Students' Union uses are covered by your privacy statement and used as intended</p>
<i>d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay</i>		<p>Update the student profile screen to include all personal information held on them</p> <p>Add options within the admin interface to allow Students' Union to decide whether to display or allow edit</p> <p>Provide a reporting mechanism on this page when any information is not user editable</p> <p>Provide your Students' Union with tools within admin interface to amend all personal information</p>	<p>Deal with any requests to amend data</p> <p>Choose which fields are user editable</p>

# GDPR Provision / Principles

GDPR Principle	OneVoice / UnionCloud		Your Students' Union
	Will Do	Will Provide	Must
<i>e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals</i>	<p>Remove all identifying information upon deletion of a student from our systems</p> <p>Clearly articulate what is removed in this process as part of OneVoice element of privacy statement</p> <p>Retrospectively remove any alumni in existing system</p>	<p>Time-based deletion of alumni students data x months after their course end date or last login where x defaults to 12 but can be set by the Students' Union</p> <p>Ability for someone to re-register once deleted with a new account</p>	<p>Decide the duration you wish to keep records for, the legitimate interest reason for this timeframe, and articulate these within the privacy statement</p> <p>Inform OneVoice when records can be retrospectively removed</p>
<i>f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures</i>	<p>Store all data using industry standard Cloud provision and practices</p> <p>Ensure all staff with access to OneVoice data have received GDPR training</p> <p>Audit/Log access within the system and its infrastructure</p> <p>Have a Data Protection Officer</p> <p>Review policy and practices regularly</p> <p>Improve technical infrastructure to add tools as they become available</p>	<p>Access controls within the admin interface</p> <p>Access to audit trails and/or log information when required by Union to meet requests from outside, e.g. ICO or University</p> <p>Ways to send OneVoice data</p>	<p>Manage access to your UnionCloud account</p> <p>Ensure all users with access have received GDPR training</p> <p>Request information in light of a request from an external body</p> <p>Have a Data Protection Officer</p>

# GDPR Provision / Rights

The GDPR provides the following rights for individuals:

Individual Rights	OneVoice / UnionCloud		Your Students' Union
	Will Do	Will Provide	Must
<i>Right to be informed</i>	Prepare a general privacy statement covering OneVoice Activity	Default privacy statement that can be edited within the UnionCloud CMS  Page that combines the Students' Union edited/replaced privacy information with the OneVoice general information	Review and then amend or re-write the Students' Union part of the privacy statement  Link to this page appropriately from within your CMS. Suggest via the footer on all pages
<i>Right of access</i>		Tool that collates all information held within UnionCloud available within profile screen	Respond to requests using this tool
<i>Right to rectification</i>	Covered in Principle d) response on page 4 of this document		
<i>Right to erasure</i>		Delete account button for students that removes personal identifying information	
<i>Right to restrict processing</i>	Only enable access if consent has been given within the system or externally		
<i>Right to data portability</i>		Tool that collates all information held within UnionCloud available within profile screen	
<i>Right to object</i>		Tools to remove any data that should no longer be processed post an upheld objection  Granular consent to stop processing around all areas other than elections	Students' Union will outline in its data protection policy a mechanism to object and act upon any upheld objection
<i>Rights related to automated decision-making including profiling</i>	When purchasing direct from UnionCloud specific consent is gained  Outside of this no profiling of an individual takes place		



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