

## CoPED – Privacy Notice

### 1. Purpose

Coventry University is committed to protecting your privacy. This notice will help you understand how we look after your personal data and how we make sure that we meet our obligations to you under the UK data protection laws (referred to in this notice as the "Data Protection Laws"). This notice outlines how we will use, store and share your personal data, and supplements any other notices or statements we may provide to you.

If you have any questions in relation to this notice or generally how your personal data is processed by us please contact our Data Protection Officer by letter addressed to: Data Protection Officer, Coventry University, Priory Street, Coventry CV1 5FB; or by email at: [enquiry.igu@coventry.ac.uk](mailto:enquiry.igu@coventry.ac.uk).

### 2. Who are we?

In this Privacy Notice, the terms "**we**", "**our**", and "**us**" refer to Coventry University, Priory Street Coventry, United Kingdom CV1 5FB (ICO registration number Z6939585). You can find the full [details of the Group](#).

We are a controller of your information which means that we are responsible for looking after it. We will use your personal data fairly, lawfully and in a transparent manner, and in accordance with the Data Protection Laws.

### 3. What do the key terms mean?

"**Personal data**" means any information we hold about you from which you can be identified. It may include contact details, identification numbers, other personal information, photographs and expressions of opinion about you or indications as to our intentions about you.

"**Processing**" means doing anything with the personal data, such as collecting, recording, organising, structuring, storing, adapting or altering, retrieving, accessing, consulting, disclosing, disseminating, aligning or combining, restricting, erasing or destroying or using the data in any way.

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### 4. Website privacy notice

#### Information we may collect from you

We will only collect personally identifiable information (such as your name, address and contact details) or such other information as may be listed in the relevant data collection form, via the CoPED Website when it is voluntarily submitted by you to us. We may collect and process the following data about you for the purposes specified:

- Personal details given to us by you via on-line forms will be used to provide you with information, goods or services you have requested, such as course brochures or prospectuses. The details you provide will not be used for marketing purposes unless you have been informed of this and have expressly consented to having your details used for this purpose;
- Information provided by you via feedback forms or questionnaires will be used in our legitimate interest so to improve our site;
- Information provided by you when reporting a fault with the CoPED Website will be used for the purposes of rectifying that fault in accordance with the legitimate interests of Coventry University;
- If you contact us we may keep a record of that correspondence so as to deal with and/or respond to that correspondence as is necessary for the performance of any contract with you or in order to take step at your request prior to the entering into of a contract and/or where such processing is in the legitimate interests of Coventry University;
- Personal data provided as part of any online application process for an employment opportunity shall be processed so as to allow us to process and evaluate the merits of that application in accordance with our legitimate interests;
- Personal Data made public through the online portal will be visible to other users who can then contact you through internal channels and email if information is added;

We may also use personal data which you provide to us in any of the ways listed above and in the following ways:

- To deal with and/or respond to any enquiry or request made by you prior to entering into any contract or agreement with Coventry University or as a result of such contract or agreement ;
- To ensure that content on the CoPED Website is presented in the most effective manner for you and your computer in accordance with our legitimate interests;
- To carry out our obligations arising from any contracts entered into between you and us;
- To allow you to participate in interactive features of the CoPED Website, if/when you choose to do so whether this be prior to you entering into any contract or agreement with the University or as a result of the same;
- To comply with a legal obligation to which Coventry University is subject;
- To notify you about any changes to Coventry University or the courses or services offered where it is in our legitimate interests to do so and where you have expressed an interest in the same previously or where such notification is required so as to allow us to perform any contractual agreement with you or where you have expressly opted in to receiving such communications.

If you do not want us to use your personal data in any of the ways set out above you can opt out of receiving communications from us at any time thereafter by clicking the “unsubscribe” or “opt out” link in any such communications.

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data

with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

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## 5. Retention of personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

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## 6. IP addresses and cookies

Information about your computer including logging information, such as your machine's IP address, operating system and browser type, may be collected automatically by the server and used for system administration and statistical purposes only. This is statistical data about the browsing actions and patterns of users of the CoPED website, and does not identify any individual.

Cookies may be used to collect user data to enhance your experience of the CoPED Website. For example, we may use cookies to determine whether your browser can accept a particular type of software, or to stop pop-up boxes appearing each time you visit the CoPED Website. We may use cookies for other purposes in the future, as the CoPED Website develops and this statement will be amended to reflect any such changes. Further details of our notice in relation to cookies can be [found in our Cookie Notice](#).

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## 7. Where we store your personal data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of our contracts and/or agreements with you, the processing of any payments and the provision of support services. By submitting your personal data, you agree to this transfer, storage and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice and that it is subject to appropriate safeguards.

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All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access specific parts of the CoPED Website, you are responsible for keeping that password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our site; any transmission is at your own risk. Once we have received your information we will use strict procedures and security features to try and prevent unauthorised access.

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## 8. UK GDPR and Data Protection

[Coventry University Group](#) (the “University”) recognises the need to protect individuals privacy by complying with the UK GDPR, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulation.

To help with compliance the University ensures that effective measures are in place to protect personal data and to ensure that it is handles in accordance with the data protection principles.

If you have any queries or concerns about how the Group processes your personal data you can contact our Data Protection Officer via:

**Email:** [dpo@coventry.ac.uk](mailto:dpo@coventry.ac.uk)

**Post:** Data Protection Officer, Coventry University, Priory Street, Coventry, CV1 5FB

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## 9. Disclosure of your information

Information about you will only be disclosed to relevant employees of the Coventry University Group, and will not be revealed to third parties outside it, unless we are under a legal duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce any agreements that may be entered into between us; or to protect the rights, property or safety of the Coventry University Group, its students, staff or others. This includes exchanging information with other companies and organisations for the purposes of fraud prevention and credit risk reduction.

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## 10. Your rights

You have the right to:

**Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data that we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data that we hold about you corrected, although we may need to verify the accuracy of the new personal data that you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your personal data unlawfully or where we are required to erase your personal data to comply with local law. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal data, which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information that you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. You can ask us to stop sending you marketing messages at any time by following the "unsubscribe" (or similar) links on any marketing message sent to you or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase, product/service experience or other transactions.

If you wish to exercise any of your above rights, please send a written request to the Information Governance Unit, Coventry University, Priory Street, Coventry, CV1 5FB or email [dsar@coventry.ac.uk](mailto:dsar@coventry.ac.uk).

You will not have to pay a fee to access your personal data or to exercise any of your other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. The CoPED Website may, from time to time, contain links to and from external websites as a service to our visitors. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. The provision of a link on our site to an external website should not be taken as an endorsement by Coventry University of that external website, its owners or their products/services.

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### **Changes to our website privacy notice**

Any changes we may make to our website privacy notice in the future will be posted on this page.

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## **11. Complaints**

If you are unhappy with the way in which we have collected or processed your personal data or have any other complaint in relation to our handling of your personal data you can contact our Data Protection Officer by writing to the Information Governance Unit, Coventry University, Priory Street, Coventry, CV1 5FB or email [dpo@coventry.ac.uk](mailto:dpo@coventry.ac.uk)

You also have a right to make a complaint to the Information Commissioner, further information can be found on the Information Commissioner's website at [www.ico.org.uk](http://www.ico.org.uk) or via their helpline on 0303 123 1113.