

ASU LONDON

PRIVACY AND DATA PROTECTION POLICY

Summary	The aims of this policy are to: 1. Set out the expectations and procedures in relation to how personal data is processed at ASU London. 2. Ensure ASU London complies with data protection legislation and best practice 3. Minimise the risk to ASU London of personal data breaches and other breaches of data protection legislation		
Policy Owner	Director of Finance & Resources		
Policy Sponsor	CEO		
Policy applies to	All staff at ASU London		
Equality impact assessment completed	This policy, and the privacy and data protection legislative framework acknowledge that personal data relating to individuals with protected characteristics under the Equality Act 2010 needs to be carefully managed and controlled. Such data is deemed Special Category Personal Data as it is likely to be more sensitive, or private, and therefore likely to cause more damage or distress if compromised. It is therefore given additional protection in data protection legislation and this policy.		
Relevant Legislation and Policies	General Data Protection Regulation (GDPR) Data Protection Act 2018 Equality Act 2010		
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DOCUMENT CONTROL

Date	Version	Action	Amendments
17/02/21	1	Approved	
21/01/22	2	Amended	Include the Student ROPA as Appendix D
19/08/2022	3	Amended	Updated job role titles

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1. INTRODUCTION

- 1.1 ASU London is committed to protecting the privacy and security of personal data belonging our staff, students and other stakeholders in accordance with our obligations under the General Data Protection Regulation (GDPR), the Data Protection Act 2018 and any UK legislation relating to the protection of personal data and the privacy of individuals.
- 1.2 This policy sets out the roles and responsibilities of ASU London and its officers regarding the collection, processing, security of and access to personal data, detailing governance and due diligence arrangements and the framework for investigating and preventing data breaches.

2. POLICY STATEMENT

- 2.1 The aims of this policy are to:
 1. Set out the expectations and procedures in relation to how personal data is processed at ASU London.
 2. Ensure ASU London complies with data protection legislation and best practice.
 3. Minimise the risk to ASU London of personal data breaches and other breaches of data protection legislation.
- 2.2 In order to achieve these aims, and in accordance with the GDPR's data protection principles (refer Appendix A) and data subject rights, ASU London will:
 1. Embed data protection and privacy by design so that data protection and privacy issues are considered upfront in our activities.
 2. Process personal data in a lawful, fair and transparent manner.
 3. Ensure that personal data is collected for specific, explicit and legitimate purposes and that data is limited to that necessary for the purposes it is collected and processed.
 4. Maintain personal data that is accurate and up-to-date, correcting or deleting inaccurate data.
 5. Inform data subjects of the lawful basis and explain the purpose and manner of the processing in the form of privacy notices and other similar methods.
 6. Only keep personal data in an identifiable format for as long as necessary (noting the exceptions for public interest, scientific, historical or statistical purposes).
 7. Maintain confidentiality and keep personal data secure.
 8. Ensure staff are trained appropriately in managing personal data
 9. Not share personal data with third parties unless adequate standards of data protection can be guaranteed and, where appropriate, contractual arrangements are put in place
 10. Implement comprehensive and proportionate governance measures to demonstrate compliance with data protection legislation principles
 11. Observe the rights of individuals under data protection legislation (Refer Appendix A)

3. SCOPE OF THIS POLICY

- 3.1 This policy applies to all ASU London activities and processes in which personal data is used, regardless of whether it is in a digital or hard copy format.
- 3.2 This policy applies to ASU London staff and students and to others acting for or on behalf of ASU London who are granted access to our information infrastructure.

4. DEFINITIONS

- 4.1 Data Controller: A person, public authority, agency or other body that, alone or jointly with others, determines the purposes and means of processing personal data. ASU London is the data controller for the purposes of this policy. A data controller remains responsible for a data processor's use of information which is passed to a data processor by the data controller and must take steps to ensure that processors are able to protect personal data before providing it.
- 4.2 Data Processor: A person, public authority, agency or other body that processes personal data on behalf of the data controller, for example agents and contractors (not an employee of the data controller).
- 4.3 Data Protection Officer: The person responsible for informing and advising ASU London about its data protection obligations and for monitoring ASU London's compliance with them. At ASU London the Data Protection Officer is the Director of Finance & Resources (dpo@asu-london.ac.uk).
- 4.4 Data Subject: The identified or identifiable living individual to whom personal data relates.
- 4.5 Personal Data: Any information relating to a person (data subject) who can be identified, directly or indirectly, through an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. ASU London processes personal data relating to a number of categories of data subject, including employees, students, applicants, business contacts, visitors, suppliers, and contractors.
- 4.6 Personal Data Breach: A security incident that has affected the confidentiality, integrity, or availability of personal data. A personal data breach occurs whenever any personal data is accidentally lost, destroyed, corrupted, or disclosed; accessed or passed on without proper authorisation; or is made unavailable and this unavailability has a significant negative effect on individuals.
- 4.7 Processing: In relation to personal data, processing means almost anything ASU London might do with personal data or sets of personal data (whether or not by automated means) such as collection, recording, organisation, structuring, storage, alteration, retrieval, consultation, use, disclosure, dissemination, restriction, erasure or destruction.

- 4.8 Special Category Personal Data: Personal data that is likely to be more sensitive, or private, and therefore likely to cause more damage or distress if compromised. It is therefore given additional protection in data protection legislation. The categories are:
1. Personal data revealing racial or ethnic origin;
 2. Personal data revealing political opinions;
 3. Personal data revealing religious or philosophical beliefs;
 4. Personal data revealing trade union membership;
 5. Genetic data;
 6. Biometric data (where used for identification purposes);
 7. Data concerning health;
 8. Data concerning a person's sex life and
 9. Data concerning a person's sexual orientation.

5. ROLES AND RESPONSIBILITIES

- 5.1 The Strategic Leadership Team is responsible for ensuring Privacy and Data Protection Policies are in place and that suitable controls are in operation to monitor and comply with our legislative responsibilities in these areas.
- 5.2 The Data Protection Officer (The Director of Finance & Resources) is responsible for:
- 5.2.1 Informing and advising ASU London about its data protection obligations and responsibilities. Ensuring ASU London staff are aware of and trained in data protection.
 - 5.2.2 Monitoring compliance within ASU London and commissioning regular reviews and audits to monitor compliance and ensure improvement recommendations are actioned.
 - 5.2.3 Providing advice and reviewing data protection impact assessments (refer Appendix 2)
 - 5.2.4 Ensuring all subject access requests are processed at ASU London and all personal data breaches investigated in accordance with Section 8 of this policy.
 - 5.2.5 Cooperating with the Information Commissioner's Office (ICO) as required and acting as the contact point for any issues relating to data protection.
- 5.3 The Strategic Leadership Team is responsible for:
- 5.3.1 Taking responsibility for data protection compliance within their functional areas.
 - 5.3.2 Ensuring their staff involved in data processing have completed ASU London's mandatory online GDPR training within the last two years.

- 5.3.3 Ensuring that any contractors, short term, or voluntary staff that are employed in their portfolios are appropriately vetted for the data they will be processing, are not given access to personal data other than that which is essential for the work they are undertaking and have undertaken appropriate GDPR training. Any personal data collected or processed for ASU London by contractors, short term or voluntary staff must be kept securely and confidentially and either returned to ASU London on completion of the work or securely destroyed in consultation with ASU London.
- 5.4 The Head of Technology is responsible for:
- 5.4.1 Managing information security across ASU London to ensure risk assessment, mitigation and review with regard to information security (refer IT Usage Policy).
- 5.4.2 Assist the Data Protection Officer in relation to system-related DPIAs, data breaches and data subject access requests.
- 5.5 ASU London Staff:
- 5.5.1 All ASU London staff must complete the mandatory online GDPR training course and ensure they refresh this training every two years.
- 5.5.2 Our staff who process personal data must ensure that:
- a. All information processed is necessary for the purpose for which it is required;
 - b. All personal data is kept securely in line with the IT Usage Policy;
 - c. No personal data is disclosed (accidentally or otherwise), to any unauthorised third party;
 - d. Personal data is kept in accordance with approved data retention schedules which, at ASU London, are our Staff and Student Registers of Processing Activities (ROPAs) (see Appendix D);
- e. Any queries regarding data protection, including subject access requests and complaints, are promptly directed to the Data Protection Officer (Director of Finance & Resources) (dpo@asu-london.ac.uk)
- f. Any personal data protection breaches are promptly brought to the attention of the Data Protection Officer as soon as possible (dpo@asu-london.ac.uk) (refer section 8);
 - g. Advice is sought from the Data Protection Officer if there is uncertainty about a data protection matter (dpo@asu-london.ac.uk);
 - h. They notify their line manager and the Data Protection Officer immediately if they believe this policy has been breached.
- 5.5.3 To assist staff in fulfil their data protection obligations, Appendix A sets out the principles for processing personal data that we will adhere to.

5.6 ASU London Students:

5.6.1 Students will be made aware of the Privacy Notice and Privacy and Data Protection Policy to ensure that:

- They are aware how their data will be collated and managed;
- They respect the privacy and personal data of staff, students, industry and community members working alongside them at ASU London;
- They know who to report or escalate a suspected personal data breach to (refer 7.2.1).

5.6.2 Students should make sure that the personal data they provide to ASU London is up-to date and accurate.

6. PRIVACY NOTICE

6.1 In order to inform our staff, students and the wider community about our commitment to privacy and data protection; to detail the types of personal data we may collect; and to explain how we store and handle personal data, ASU London will publish a [Privacy Notice](#) on its website.

6.2 The Privacy Notice covers the following information:

6.2.1 Who we are, our aims and objectives;

6.2.2 Key definitions, a summary of our legal obligations and contact details;

6.2.3 Details regarding when and how we will collect data, and the lawful bases we will rely on to process it;

6.2.4 Our use of cookies;

6.2.5 Data subject rights; and

6.2.6 Additional information about how we use data including data retention and sharing of your data.

6.3 The Privacy Notice will be updated from time to time and past versions of this Privacy Notice are available by request to the Data Protection Officer (data.request@asu-london.ac.uk).

6.4 As set out in the ASU London Privacy Notice, you have the right to receive copies of your personal data held by ASU London and can do so by request to the Data Protection Officer data.request@asu-london.ac.uk.

6.5 Further information about your rights is available from the [Information Commissioner's Office](#)

7. DATA PROTECTION IMPACT ASSESSMENTS

- 7.1 As part of our commitment to privacy and data protection by design and in order to meet individuals' privacy expectations, ASU London will use data protection impact assessments (DPIAs) to help identify and reduce data protection risks relating to our processes, to specific projects and to any arrangements ASU London has in place with data processors.
- 7.2 Processes for which DPIAs will be completed include the use of new technologies for data processing which may be likely to result in a high risk to the rights and freedoms of individuals. This may include (but is not limited to) systematic and extensive processing activities, large scale processing of special category personal data, third-party involvement in data processing and the use of CCTV.
- 7.3 As a data controller, ASU London remains responsible for the use of information it has passed to a data processor and must take steps to ensure that a data processor is able to protect personal data before providing it them. A DPIA will be undertaken by the relevant portfolio in ASU London in consultation with the Data Protection Officer.
- 7.4 A template for DPIAs is available at Appendix B. DPIAs will be discussed with and approved by the Dean / CEO of ASU London.
- 7.5 A register of DPIAs will be maintained by the Data Protection Officer and DPIAs will be made available to the Information Commissioner on request.

8. CONTRACTS WITH THIRD PARTIES

Data Sharing Agreements

- 8.1 ASU London is required to put in place a data sharing agreement with third party data controllers. This helps everyone to understand the purpose for sharing data, what will happen at each stage and what responsibilities the parties have.
- 8.2 A data sharing agreement will include details about:
 - 8.2.1 The parties' roles;
 - 8.2.2 The purpose of the data sharing;
 - 8.2.3 What is going to happen to the data at each stage;
 - 8.2.4 Regular reviews to ensure information and processes remain up-to-date and appropriate.
- 8.3 Anyone wishing to make a data sharing agreement should first speak to the DPO to ensure that an appropriate template is used. A DPIA must also be completed (refer Section 7 and Appendix B)
- 8.4 A register of Data Sharing Agreements will be maintained by the Data Protection Officer and Data Sharing Agreements will be made available to the Information Commissioner on request.

Written Contracts with Data Processors

- 8.5 ASU London is required to put in place a written contract with any data processors. Anyone wishing to appoint a data processor should first speak to the DPO to ensure that an appropriate contract is used. A DPIA must also be completed (refer Section 7 and Appendix B)
- 8.6 Written contracts with data processors shall include the following details relating to the data processing:
- 8.6.1 Subject matter of the processing;
 - 8.6.2 Duration of the processing;
 - 8.6.3 Nature and purpose of the processing;
 - 8.6.4 Type of personal data involved;
 - 8.6.5 Categories of data subject; and
 - 8.6.6 Controller's obligations and rights (in accordance with the list set out in Article 28(3) of the UK GDPR)
- 8.7 The DPO will maintain a register of all current processor contracts, which will be updated when processors change.
- 8.8 If a data processor uses a sub-processor to help with the processing it is doing on ASU London's behalf, written authorisation from ASU London and a written contract with that sub-processor will be put in place.

9. PERSONAL DATA BREACHES

- 9.1 ASU London will ensure that personal data is kept secure. To do this we will implement appropriate technical measures (e.g., encryption, access control) and ensure our staff are aware of and trained in data protection principles and practices so as to avoid unauthorised or unlawful processing and the accidental loss, destruction, or damage of personal information.
- 9.2 Should a personal data breach occur, ASU London will manage the incident efficiently and effectively as follows:
- 9.2.1 All suspected and actual data breaches will be reported to the Data Protection Officer (the Director of Finance & Resources) and the Head of Technology (if the data breach is related to IT systems) as soon as possible. Staff can escalate an actual or suspected breach via their supervisor and students can escalate an actual or suspected breach via Student Hub in the Registry. Reports should be made as a matter of urgency. A data breach reporting form is at Appendix B together with examples of personal data breaches that need to be reported,
 - 9.2.2 In the first instance, the DPO (and Head of Technology if appropriate), with the assistance of relevant staff members, will control and contain any data breaches to recover data, prevent further breaches and minimise harm.
 - 9.2.3 The DPO will then:

- a. Assess the risks associated with data breach to determine the next steps in terms of containing the breach;
- b. Notify relevant parties (taking into account legal, regulatory, and contractual notification requirements as well as the need to notify data subjects who may have been affected);
- c. Take steps to prevent further breaches occurring by implementing specific and systemic improvements;
- d. Consider whether any staff disciplinary or student misconduct procedures need to be instigated where there evidence of non- compliance with this policy; and,
- e. Ensure records of the data breach and ASU London’s response are maintained and that the effectiveness of ASU London’s response is reviewed by the Strategic Leadership Team.

10. SUBJECT ACCESS REQUESTS

- 10.1 Data subjects are entitled to ask ASU London to provide a copy of any information that ASU London holds about them. The right of access, commonly referred to as subject access, gives individuals the right to obtain a copy of all personal data that ASU London holds about them.
- 10.2 Subject Access Requests can be made to the DPO (data.request@asu-london.ac.uk) but can be made via any channel (email, letter, over the phone, even via social media.
- 10.3 The DPO will process requests in accordance with the legislation.
- 10.4 Staff are required to assist the DPO in providing relevant information as a priority. This is because we must comply with a subject access request, ‘without undue delay’ and, at the latest, within one month of receipt of the request (unless the request is complex or there are multiple requests).
- 10.5 In certain circumstances, ASU London can charge an administrative fee which can take into account factors including who is processing the information, the costs of locating, retrieving and extracting the information, the costs of communicating and providing copies of the information etc. The DPO will determine whether a fee will be charged and what a reasonable fee will be.
- 10.6 If anyone (for example, the Police or the spouse or parent of a data subject) requests access to personal data relating to another person, staff must first check with their line manager or the DPO (data.request@asu-london.ac.uk before making a disclosure.
- 10.7 Further information about data subject rights is accessible via ASU London’s [Privacy Notice](#).

11. PROVIDING REFERENCES

- 11.1 ASU London staff who give references (which should be written in all cases) should ensure they contain only information that is factual or is an honest opinion or judgement that is capable of being demonstrated as being reasonable by reference to actions or events. It should also be clear in what capacity you are providing the reference.
- 11.2 In respect of references for current or past employees of ASU London, you should inform the People Team of the request and an agreed written reference will be provided and retained on the relevant staff member's personnel e-file.
- 11.3 In respect of references for ASU London students, you should inform the Registry of the request and an agreed written reference will be provided and retained on the relevant student's record.
- 11.4 Referees should be aware that confidential references are exempted from data subject access requests under data protection legislation, although this may be overridden in the unlikely event of a relevant court case or legal action (which could potentially result in you personally and/or ASU London being held liable for losses incurred should the reference be found to be inaccurate).

12. DATA GOVERNANCE AND TRAINING

- 12.1 ASU London will demonstrate compliance with data protection legislation principles through the following governance arrangements:
 - 12.1.1 An annual report on data protection compliance, in addition to reports of any data breach incidents that require reporting to the ICO and the results of data compliance reviews and audits, will be made to the Audit, and Risk Committee of the Board of Trustees.
 - 12.1.2 The appointment of the Director of Finance & Resources as Data Protection Officer to inform and advise ASU London about its obligations to comply with data protection legislation, to monitor compliance, and to be the first point of contact for the Information Commissioner and for individuals whose data is processed.
 - 12.1.3 ASU London will maintain records of its processing activities, data breach incidents and their management and will ensure data protection impact assessments (DPIAs) are in place for any significant data processing activities, particularly those involving third-parties which will be made available to the Information Commissioner on request.
 - 12.1.4 ASU London will adhere to the principles of privacy and data protection by design (designing projects, processes, products or systems with privacy in mind at the outset). Relevant actions could include: Data minimisation, data anonymisation, transparency, continuous improvement regarding data security, implementation and review of DPIAs.
 - 12.1.5 ASU London will publish and keep updated a Privacy Notice on its website informing data subjects and the wider community about our commitment to privacy and data protection; the types of personal data we may collect; and information about how we store and handle personal data.

- 12.2 ASU London will ensure our staff are trained about data protection and managing personal data via our online data protection training course within one month from the date of commencing employment and then regularly every two years. Training completion rates will be monitored by the Data Protection Officer.
- 12.3 The Data Protection Officer will also provide or arrange tailored training and advice on request and if data protection issues are identified with regard to particular areas or processes.
- 12.4 The Privacy and Data Protection Policy will be disseminated to staff and students via the ASU London website. Staff, students and data subjects can contact the Data Protection Officer with any data protection queries (dpo@asu-london.ac.uk).

13. MONITORING AND REVIEW

- 13.1 The Director of Finance & Resources, as the Data Protection Officer, will ensure that compliance with the policy is monitored.
- 13.2 The Policy will be reviewed every three years.

APPENDIX A

Data Protection Principles And Data Subjects Rights Explained

Data Protection Principles

Principle	Requirement and what we will do
Lawfulness, fairness and transparency	<p>Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.</p> <p>We will provide the data subject with information about his/her personal data processing in a concise, transparent and intelligible manner, which is easily accessible, distinct from other undertakings between ASU London and the data subject, using clear and plain language.</p> <p>If we need to transfer personal data outside of the EEA, we will ensure that it is adequately protected in accordance with legal requirements.</p>
Purpose limitation	<p>Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.</p> <p>We will regularly review the purposes for which we use personal data and will take steps to inform the data subject in advance of any changes to those purposes.</p>
Data minimisation	<p>Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.</p> <p>We will ensure that we collect enough data to achieve our purposes but not more than needed.</p>
Accuracy	<p>Personal data shall be accurate and, where necessary, kept up to date.</p> <p>We will take reasonable steps to delete or amend inaccurate or outdated data.</p>
Storage limitation	<p>Personal data shall be 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.</p> <p>We will implement technical and organisational measures to ensure that we only retain personal data where we have a legal ground to so.</p>
Integrity and confidentiality	<p>Personal data shall be 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.</p> <p>We will assess risk, implement appropriate security for personal data and check on a regular basis that our security is up to date and working effectively.</p> <p>All data processors appointed by ASU London will be assessed against their ability to adequately protect personal data and we will have formal agreements in place with them.</p>

Principle	Requirement and what we will do
Accountability	<p>The controller shall be responsible for and be able to demonstrate compliance with the data protection legislation.</p> <p>We will maintain records of our compliance and undertake periodic audits to ensure we continually improve our processes and measures to protect personal data.</p>

Data Subject Rights

Right provided by GDPR	Notes
<p>Right to be informed</p> <p>We will provide privacy notices when collecting personal data from data subjects (via websites, forms, emails)</p>	<p>If data is obtained directly from the data subject, the information should be provided at the time of collection of the data.</p> <p>If data is not obtained directly the information should be provided:</p> <ul style="list-style-type: none"> • Within a reasonable period of obtaining the data (within one month); • If the data are used to communicate with the data subject, at the latest, when the first communication takes place; and • If disclosure to another recipient is envisaged, at the latest, before the data are disclosed.
<p>Right of access</p> <p>Data subjects have the right to obtain:</p> <ul style="list-style-type: none"> • Confirmation that their data is being processed; • Access to their personal data; and • Other supplementary information – this largely corresponds to the information that should be provided in a privacy notice. 	<p>Information must be provided without delay and at the latest within one month of receipt. ASU London will be able to extend the period of compliance by a further two months where requests are complex or numerous. If so, we must inform the individual within one month and explain why.</p> <p>All requests must be passed immediately to the DPO.</p> <p>This right only allows access to their personal data (with some permissible exceptions).</p>
<p>Right to rectification</p> <p>Individuals are entitled to have personal data rectified if it is inaccurate or incomplete.</p>	<p>We must respond within one month or, if the request is complex, this can be extended by two months.</p> <p>If we are not taking any action, we must explain why to the individual, informing them of their right to complain to the supervisory authority and to a judicial remedy.</p> <p>All requests must be passed immediately to the DPO.</p>

Right provided by GDPR	Notes
<p>Right to erasure A data subject may request the erasure of personal data where the personal data:</p> <ul style="list-style-type: none"> • Is no longer necessary in relation to the purpose for which it was originally collected/processed • Was unlawfully processed • Has to be erased in order to comply with a legal obligation • Is processed in relation to the offer of information society services to a child <p>The individual:</p> <ul style="list-style-type: none"> • Withdraws consent • Objects to the processing and there is no overriding legitimate interest for continuing the processing 	<p>We can refuse to comply with a request for erasure where the personal data is processed:</p> <ul style="list-style-type: none"> • To exercise the right of freedom of expression and information; • To comply with a legal obligation or for the performance of a public interest task or exercise of official authority; • For public health purposes in the public interest; • For archiving purposes in the public interest, scientific research historical research or statistical purposes; or • For the exercise or defence of legal claims. <p>All requests must be passed immediately to the DPO.</p>
<p>Right to restrict processing Processing must be suppressed where:</p> <ul style="list-style-type: none"> • The individual contests the accuracy of the personal data; • An individual has objected to the processing (where it was necessary for performance of a public interest task or legitimate interests); 	<p>We can continue to store the personal data, but may only further process it:</p> <ul style="list-style-type: none"> • With the data subject's consent; • To establish, exercise, or defend legal claims; • To protect the rights of another individual or legal entity; or • For important public interest reasons. <p>You must inform individuals when you decide to lift a restriction on processing.</p> <p>All requests must be passed immediately to the DPO.</p>

Right provided by GDPR	Notes
<ul style="list-style-type: none"> • Processing is unlawful and the individual requests restriction instead of erasure; • You no longer need the personal data but the individual requires the data to establish, exercise or defend a legal claim. 	
<p>Right to data portability This includes the right to:</p> <ul style="list-style-type: none"> • Receive a copy of the personal data, free of charge, from the data controller in a commonly used and machine-readable format and store it for further personal use on a private device; • Transmit the personal data to another data controller; and • Have personal data transmitted directly from one data controller to another where technically possible. 	<p>The right to data portability only applies:</p> <ul style="list-style-type: none"> • To personal data that an individual has provided to a controller; • Where the processing is based on the individual’s consent or for the performance of a contract; and • When processing is carried out by automated means. <p>We must respond without undue delay and within one month or, if the request is complex or there are numerous requests, this can be extended by two months. We must inform the individual of any extension within one month of the receipt of the request and explain why it is necessary.</p> <p>If we are not taking any action, we must explain why to the individual, without undue delay and within one month, informing them of their right to complain to the supervisory authority and to a judicial remedy.</p> <p>All requests must be passed immediately to the DPO.</p>

Right provided by GDPR	Notes
<p>Right to object Individuals have the right to object to:</p> <ul style="list-style-type: none"> • Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); • Direct marketing (including profiling); and • Processing for purposes of scientific/historical research and statistics. 	<p>If processing for the performance of a legal task or legitimate interests, individuals must have an objection on “grounds relating to his or her particular situation”.</p> <p>We must stop processing the personal data unless:</p> <ul style="list-style-type: none"> • We can demonstrate compelling legitimate grounds for processing, which override the interests, rights and freedoms of the individual; or the processing is for the establishment, exercise or defence of legal claims. <p>If processing for the performance of a legal task or legitimate interests or for direct marketing purposes:</p> <ul style="list-style-type: none"> • We must inform individuals of their right to object “at the point of first communication” and in the privacy notice. • This must be “explicitly brought to the attention of the data subject and presented clearly and separately from any other information”. <p>If processing for direct marketing purposes, there are no exemptions or grounds to refuse.</p> <p>If we receive an objection to processing for direct marketing purposes:</p> <ul style="list-style-type: none"> • We must stop processing personal data for direct marketing on receipt; and • We must deal the objection at any time and free of charge. <p>If processing for research purposes, individuals must have “grounds relating to his or her particular situation” in order to object.</p> <p>We are not required to comply with an objection if we are conducting research where the processing of personal data is necessary for the performance of a public interest task.</p> <p>If our processing activities fall into any of the specified categories and are carried out online, we must offer a way for individuals to object online.</p> <p>All requests must be passed immediately to the DPO.</p>
<p>Rights in relation to automated decision making and profiling Individuals have the right not to be subject to a decision when:</p> <ul style="list-style-type: none"> • It is based on automated processing; and • It produces a legal effect or a similarly significant effect on the individual. 	<p>The right does not apply if the decision:</p> <ul style="list-style-type: none"> • Is necessary for entering into or performance of a contract between us and the individual; • Is authorised by law (e.g. for the purposes of fraud or tax evasion prevention); • Is based on explicit consent; or • Does not have a legal or similarly significant effect on the individual. <p>We must ensure that individuals are able to:</p> <ul style="list-style-type: none"> • Obtain human intervention; • Express their point of view; and • Obtain an explanation of the decision and challenge it. <p>All requests must be passed immediately to the DPO.</p>

APPENDIX B

Data Protection Impact Assessment (DPIA)

Primary contacts for advice and guidance:

Data Protection Officer

Head of Business Systems

Director of Resources

IT Services

ASU London

ASU London

dpo@asu-london.ac.uk

c/o dpo@asu-london.ac.uk

Summary

A Data Protection Impact Assessment (DPIA) is a process to help you identify and minimise the data protection risks of a project or process.

You must conduct a DPIA for processing that is likely to result in a high risk to individuals. It is also good practice to do a DPIA for any other major project which requires the processing of personal data.

You should fill out the DPIA at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan. Further Information:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/>

Screening questions

These questions are intended to help you decide whether a DPIA is necessary. **Answering 'yes' to any of these questions is an indication that a DPIA is required.** You can expand on your answers as the project / process develops if you need to.

1. Will the project / process involve the collection of new information about individuals?
2. Will the project / process compel individuals to provide information about themselves?
3. Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?
4. Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?
5. Does the project / process involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.
6. Will the project / process result in you making decisions or taking action against individuals in ways that can have a significant impact on them?
7. Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.

8. Will the project / process require you to contact individuals in ways that they may find intrusive

Submitting controller details	
Name of controller	ASU London
Title of DPO	Director of Resources
Name of DPO	Nancy Huggett

Step 1: Identify the need for a DPIA
<p>Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.</p>
<p>Step 2: Describe the processing</p> <p>Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?</p>
<p>Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?</p>

The GDPR defines special category data as:

- Personal data revealing **racial or ethnic origin**;
- Personal data revealing **political opinions**;
- Personal data revealing **religious or philosophical beliefs**;
- Personal data revealing **trade union membership**;
- **Genetic data**;
- **Biometric data** (where used for identification purposes);
- Data concerning **health**;
- Data concerning a person's **sex life**; and
- Data concerning a person's **sexual orientation**.

This does not include personal data about criminal allegations, proceedings or convictions, as separate rules apply. For further information, please see our separate guidance on [criminal offence data](#).

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

Step 3: Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

The lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply whenever you process personal data:

- (a) **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.*
- (b) **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.*
- (c) **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).*
- (d) **Vital interests:** the processing is necessary to protect someone's life.*
- (e) **Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.*
- (f) **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)*

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
		Eliminated reduced accepted	Low medium high	Yes/no

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA

APPENDIX C

Personal Data Breach Reporting Form And Examples

Actual and suspected personal data breaches should be reported using the form below. Examples of personal data breaches are listed below. If you are in doubt, make a report.

Human error

- Personal data emailed, posted or handed to the wrong recipient
- Excessive/non-essential personal data provided to otherwise valid recipients
- Personal data received in error
- Loss of hard copy material containing personal data
- Loss of any ASU London data storage device, regardless of the data it contains, e.g. laptop, PC, USB drive, tablet, removable hard drive, smart phone or other portable device (NOTE: Loss of any privately-owned devices should only be reported if they contain personal data related to university activities)
- Unauthorised publication of personal data onto a website or social media channel

Theft

- Theft of hard copy material containing personal data
- Theft of any ASU London data storage device, regardless of the data it contains, e.g. laptop, PC, USB drive, tablet, removable hard drive, smart phone or other portable device (NOTE: Theft of any privately-owned devices should only be reported if they contain personal data related to university activities)

Malicious intent

- Attempts (either failed or successful) to gain unauthorised access to university systems, e.g. hacking
- Virus or other malicious malware attacks (suspected or actual)
- Compromised user accounts, e.g. disclosure of user login details through phishing
- Information obtained by deception ("blagging")
- Deliberate leaking of personal data

Malfunctions

- Failure of software or hardware leading to personal data loss
- Damage or loss of personal data due to fire, flood, power surge or other physical damage

Personal Data Breach Reporting Form

This form should be completed by a ASU London staff member who experiences, or discovers a data breach, or their line manager, and sent to the Data Protection Officer (dpo@asu-london.ac.uk) and, where IT related, the Head of Technology as soon as possible following discovery of the incident.

Please send the form even if you cannot complete all the questions as any missing answers can be provided as and when the information becomes available. Please note that circulation of this form and any related documents must be restricted to those directly involved in investigating the incident and that no data subjects should be referred to by name in this report.

Your details	
Name and role title	
Email	
Telephone	
Date of Report	
Details of the data breach: Questions in BOLD must be answered	
Time and date breach was identified and by whom	
Description of incident – include time, date, location, how the incident occurred etc	
If there has been a delay in reporting this incident please explain why	
Details of any third-party service providers involved in the breach	
What measures were in place to prevent an incident of this nature occurring (e.g. encryption, back-ups, procedures, training)	
Please provide extracts/links to any policies and procedures considered relevant to this incident	

Personal Data Compromised:Questions in **BOLD** must be answered

Type of personal data compromised (please provide examples and/or as much detail as possible)	
Sensitive personal data compromised (specify which, if any) Sensitive personal data = race/ethnicity, political/religious beliefs, Trade Union membership, physical/mental health or condition, sexuality/sex life, criminal offence, genetic data, biometric data where processed to uniquely identify an individual. For the purposes of data breach management, other information such as bank account details should also be classed as sensitive due to the risk of fraud.	
Potential adverse consequences for the individuals – what are they, how serious or substantial are they and how likely are they to occur?	
Number of individuals whose personal data has been compromised	
Volume of data/records involved	
Type of individuals whose data has been compromised (e.g. students, staff, alumni, community / industry partners, job applicants etc)	
Are the affected individuals aware that the incident has occurred?	
Have any affected individuals complained about the incident?	
Potential adverse consequences for the individuals – what are they, how serious or substantial are they and how likely are they to occur?	
Number of individuals whose personal data has been compromised	
Volume of data/records involved	
Type of individuals whose data has been compromised (e.g. students, staff, alumni, community / industry partners, job applicants etc)	

Are the affected individuals aware that the incident has occurred?	
Have any affected individuals complained about the incident?	
Incident Management: Containment and Recovery:	
Questions in BOLD must be answered	
Is the breach contained or ongoing?	
What steps were/will be taken to contain the breach?	
When was the breach contained?	
If data lost or stolen, what steps are being taken to recover the data? If already recovered, when was the data recovered?	
Who has been informed of the breach (both inside and outside of ASU London)	
Details of regulatory bodies or collaborative partners who may need to be informed	
Has there been any media coverage of the incident? If so provide details	
Training and Prevention of Incident Re-occurring	
Has the person(s) responsible for or involved with the breach completed ASU London's Data Protection flick learning training? If so, when was this completed?	
What steps can be taken to minimise the possibility of a repeat of such an incident?	
To be completed by the Data Protection Officer	
Overall assessment of incident: (a) No risk to the data subject; (b) Risk* to the data subject; or (c) High risk** to the data subject? Provide brief explanation for decision. *Risk = must notify ICO **High risk = must notify data subject	

APPENDIX D

Student And Staff Records Of Processing Activities (ROPAS)

Student Data ROPA - last reviewed January 2022									
Category of personal data	Source of the data	Why we process it	How long we keep it	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal conviction/ criminal allegation grounds	Criminal conviction/ criminal allegation grounds (further information)
Your dates of attendance, course of study and outcome of your studies, results of examinations, assessments, awards, scholarships and prizes conferred. Records of your student status, including whether you are on the visiting student programme and whether you are a full-time or part-time student. Records of your name, gender/preferred title, official headshot/passport style photograph.	We generate this data about you.	So that we have a record of your results, as a record of your academic progression and if we are later asked for a reference or verification of your attendance. So that we can administer and provide your course.	Permanently.	Processing is necessary for performance of our contract with you. Processing is necessary for the performance of a task carried out in the public interest. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London has a legitimate interest in processing this data so that it can deliver your course.	N/A		N/A	
Information about your health, dietary requirements and/or disabilities, and records of decisions we make taking that information into account.	We obtain this data from you. We obtain this data from third parties, such as medical professionals that you ask to provide us with information.	When we consider what reasonable adjustments to make to our provision of accommodation, catering or teaching or we need to take account of any dietary requirements you have (whether for medical or belief reasons), or where there is a medical need and any decisions that we take as a result.	For 6 years after the end of the academic year you cease to be a registered student.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms Processing is necessary for compliance with a legal obligation.	ASU London has a legitimate interest in taking such information into account when it makes decisions that may affect your health, wellbeing or ability to participate. Processing is also necessary for compliance with equality law, and/or food safety law.	Substantial public interest under the UK Data Protection Act 2018.	Where ASU London processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under the Equality Act 2010 and/or under health and safety legislation. The processing is necessary for reasons of substantial public interest, namely that ASU London must comply with its statutory obligations concerning equality and to make reasonable adjustments, and to comply with its health and safety obligations. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.	N/A	

Student Data ROPA - last reviewed January 2022									
Category of personal data	Source of the data	Why we process it	How long we keep it	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal conviction/ criminal allegation grounds	Criminal conviction/criminal allegation grounds (further information)
Information about your ethnicity, health, religion or philosophical beliefs and/or sexuality processed for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment, with a view to enabling such equality to be promoted or maintained.	We obtain this data from you.	For equality monitoring purposes.	For 6 years after the end of the academic year you cease to be a registered student.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London and its students have a legitimate interest in monitoring and promoting equality of opportunity.	Substantial public interest under the UK Data Protection Act 2018.	The processing is necessary for equality of opportunity or treatment purposes in accordance with the conditions and safeguards specified in the Data Protection Act 2018, with a view to promoting or maintaining such equality.	N/A	
Records of student performance, attendance and conduct. This includes records of student self-assessment.	We obtain this data from you. We generate this data about you.	To help develop and guide you during your studies, our staff monitor and assess your contributions in group teaching sessions including your written work, provide feedback and may ask you to self-assess your progress.	Permanently.	Processing is necessary for performance of our contract with you. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London has a legitimate interest in keeping such records to help develop and guide students during their studies.	N/A		N/A	
Requests for assistance with academic matters, such as applications for special examination arrangements, requests for extensions to written work and submission of extenuating circumstances. Decision-making about such requests and records of actions taken.	We obtain this data from you. We generate this data about you.	We process this information and make decisions about you when you ask us to, and in accordance with ASU London's policies relating to such requests.	For 6 years after the end of the academic year you cease to be a registered student.	Processing is necessary for performance of our contract with you. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms. Processing is necessary for the performance of a task carried out in the public interest. Processing is necessary for compliance with a legal obligation.	ASU London has a legitimate interest in ensuring that such requests for assistance are considered pursuant to its procedures and in accordance with relevant legislation.	Substantial public interest under the UK Data Protection Act 2018.	Where ASU London processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under the Equality Act 2010. The processing is necessary for reasons of substantial public interest, namely that ASU London must comply with its statutory obligations concerning equality and to make reasonable adjustments. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.		

Student Data ROPA - last reviewed January 2022									
Category of personal data	Source of the data	Why we process it	How long we keep it	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal conviction/ criminal allegation grounds	Criminal conviction/criminal allegation grounds (further information)
Records of requests and bookings for rooms and facilities for events held by students/student societies, including records of any decisions ASU London makes pursuant to its obligation to take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, students and employees of ASU LONDON- London and for visiting speakers.	We obtain this data from you. We generate this data about you.	As part of the system for providing facilities to students and student societies.	Records will be retained for one year from the date on which a decision is made.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms. Processing is necessary for the performance of a task carried out in the public interest. Processing is necessary for compliance with a legal obligation.	ASU London has a legitimate interest in ensuring that such requests and bookings are considered pursuant to its procedures and in accordance with relevant legislation. ASU London has a legal obligation under the Education (No 2) Act 1986 to take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, students and employees of ASU London and for visiting speakers.	Substantial public interest under the UK Data Protection Act 2018.	Where ASU London processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under the Education (No 2) Act 1986. The processing is necessary for reasons of substantial public interest, namely that ASU London must comply with its statutory obligations concerning freedom of speech within the law. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018.	Where ASU London processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under the Education (No 2) Act 1986. The processing is necessary for reasons of substantial public interest, namely that ASU London must comply with its statutory obligations concerning freedom of speech within the law. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.
Financial information including your contact information and details of invoicing and payment (including payment information such as credit card or banking payment information) of fees, rooms and use of sporting and other facilities as we have arranged with you.	We obtain this data from you. We generate this data about you.	In order to provide your course and associated services.	Records of outstanding payments will be retained until they are paid in full. Records relating to invoicing will be retained for six years after the date on which the invoice was raised to comply with HMRC requirements.	Processing is necessary for performance of our contract with you.					
Information that you submitted to UCAS and/or ASU London or any third party when you applied to study at ASU London, including your academic, employment history, predicted grades, language proficiency and personal statement; details of our admissions decision about you. Details of any references, written work or research proposals you submit as part of your application, and any records we make of your application or interview. Communications between us about your admission, including feedback we provide.	We obtain this data from you. We generate this data about you. We may also obtain this data from schools or referees.	So that we have a record of our admissions decisions and can administer your application and your course. Also so that we have information and about your background and history if we are asked to provide a reference at a later date.	For 6 years after the end of the academic year you cease to be a registered student.	Processing is necessary for performance of our contract with you. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London has a legitimate interest in being able to provide references to its students and former students.				

Student Data ROPA - last reviewed January 2022									
Category of personal data	Source of the data	Why we process it	How long we keep it	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal conviction/ criminal allegation grounds	Criminal conviction/criminal allegation grounds (further information)
Details of any criminal records that you declare to us on your application, or during your studies, or of any criminal incidents or allegations concerning you reported to us by anyone else. Details of any Disclosure and Barring Service Checks about you obtained prior to or during your studies.	We obtain this data from you. We generate this data about you. We may obtain this data from third parties.	So that ASU London is a safe and secure environment.	Where criminal convictions, incidents or allegations are declared or reported to us, we will retain this data permanently. Where we require a Disclosure and Barring Service check to be carried out, we will retain the DBS certificate information for 6 months from the date the certificate is received and a skeleton record that the check was satisfactory or unsatisfactory passed will be kept on your file for 6 years from the end of the academic year in which you cease to be a registered student at ASU London.	Processing is necessary for performance of our contract with you. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London has a legitimate interest in requiring DBS checks to be carried out where its students are or may be engaged in regulated activity with children or vulnerable adults.	Substantial public interest under the UK Data Protection Act 2018.	Where ASU London processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under health and safety legislation. The processing is necessary for reasons of substantial public interest, namely that ASU London must comply with its statutory obligations concerning equality and to make reasonable adjustments, and to comply with its health and safety obligations. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018.	Where ASU London processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under health and safety legislation. The processing is necessary for reasons of substantial public interest, namely that ASU London must comply with its statutory obligations concerning equality and to make reasonable adjustments, and to comply with its health and safety obligations. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.
Your fee status (e.g. home, EU, or international) and associated information about your country of residence, the amount of your fees and funding information including your financial declaration, details of any guarantee from parents or others, any supporting information you provide about funding (e.g. loans, grants, sponsorship and/or self- funding resources, including copies of evidence you submit) and decisions that we make in light of that information.	We obtain this data from you. We generate this data about you. We obtain this data from third parties (e.g. parents, sponsors, guarantors).	In order to determine the fees you are required to pay and to confirm that you will be able to meet the requirement to pay fees.	For 6 years after the end of the academic year when you cease to be a registered student. For records relating to US loans the retention period may exceed 6 years as the need to retain US loan records is governed by US Government data retention regulations.	Processing is necessary for performance of our contract with you. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms. Processing is necessary for compliance with a legal obligation.	Legislation determines to an extent the level of fees you are required to pay, based on your country of residence. ASU London has a legitimate interest in being able to satisfy itself that students have appropriate arrangements are in place to meet the costs of their course and living expenses. ASU London has a legitimate interest in retaining information on US Loans according to US Government data retention regulations.				

Student Data ROPA - last reviewed January 2022									
Category of personal data	Source of the data	Why we process it	How long we keep it	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal conviction/ criminal allegation grounds	Criminal conviction/criminal allegation grounds (further information)
Disciplinary, harassment or grievance records if a disciplinary, harassment, grievance or other complaint is made by you or about you to ASU London, including records of any investigation and / or decision that we take, and of any appeals process.	We obtain this data from you. We generate this data about you. We obtain this data from third parties.	So that ASU London can maintain appropriate standards of conduct and behaviour for the benefit of all its members and visitors.	For 3 years after last action if no formal process initiated; 6 years after last action for formal process	Processing is necessary for performance of our contract with you. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London, its staff and students have a legitimate interest in ASU London being able to operate disciplinary, harassment and grievance procedures in accordance with its procedures.	Substantial public interest under the UK Data Protection Act 2018.	Where ASU London processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under the Equality Act 2010. The processing is necessary for reasons of substantial public interest, namely that ASU London must comply with its statutory obligations concerning equality and to make reasonable adjustments. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018.	Where ASU London processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under the Equality Act 2010. The processing is necessary for reasons of substantial public interest, namely that ASU London must comply with its statutory obligations concerning equality and to make reasonable adjustments. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to
Records generated for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom of information legislation, records made to comply with safeguarding, health and safety or counter-terrorism legislation, in connection with legal advice or claims, or to comply with auditors' requirements.	We generate this data about you.	So that we have a record of information supplied, both in the interests of good administration and also to meet legal and regulatory requirements.	These records will be retained for a period of 6 years from the date generated for compliance purposes unless there is compelling justification for the data to be retained for a longer period (for example in connection with legal advice, or in relation to auditing obligations).	Processing is necessary for compliance with a legal obligation.		Substantial public interest under the UK Data Protection Act 2018.	Where it processes special category data for these purposes, ASU London is exercising functions conferred under legislation and/or complying with regulatory requirements. The processing is necessary for reasons of substantial public interest, namely the requirement for ASU London to comply with its statutory and legal obligations.	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018.	Where it processes special category data for these purposes, ASU London is exercising functions conferred under legislation and/or complying with regulatory requirements. The processing is necessary for reasons of substantial public interest, namely the requirement for ASU London to comply with its statutory and legal obligations.
Information and copies of records confirming your entitlement to study in the UK, including records of your confirmation of acceptance for studies, passport, student visa and/or biometric residence permit, attendance records.	We obtain this data from you.	To check you are entitled to study in the UK.	For 6 years after the end of the academic year you cease to be a registered student.	Processing is necessary for performance of our contract with you. Processing is necessary for compliance with a legal obligation. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London and its students have a legitimate interest in ASU London's being able to provide information in order to enable it to comply with immigration law obligations. In the case of right to work information, the processing is necessary for ASU London to comply with the requirements of UK Visas and Immigration under immigration law.				

Student Data ROPA - last reviewed January 2022									
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We may assist students making visa applications before they arrive, and making visa extensions when they are on the course. This involves us taking copies of passports and visas, which we store electronically. We also share this information with the Home Office/UK Visas and Immigration as part of our reporting obligations under immigration law.	We obtain this data from you. We generate this data about you.	Overseas students need visas in order to attend university.	For 6 years after the end of the academic year you cease to be a registered student.	Processing is necessary for performance of our contract with you. Processing is necessary for compliance with a legal obligation. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your dat		Explicit consent.			
Emergency contact details.	We obtain this data from you.	So that we are able to contact people close to you in the event of an emergency.	For 6 years after the end of the academic year when you cease to be a registered student.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London and its students have a legitimate interest in ASU London being able to contact someone you nominate for emergency situations.				
Contextual admissions information for undergraduate admissions (relating to information about your school performance, postcode and care background).	We obtain this data from you.	This is taken into account when assessing applications	Permanently. Please note that if you participated in an outreach programme, such data may also be held on the Higher Education Achievement Tracker. An explanation of what is held on HEAT and for how long it is retained on that system is available here: www.heat.ac.uk	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms. Processing is necessary for compliance with a legal obligation.	ASU London has a legitimate interest in ensuring that people from a range of backgrounds have the opportunity to attend ASU London. Under relevant legislation ASU London is required to adhere to any agreement it has with the Office for Students, which includes the use of contextual data in the undergraduate admissions process.				
Information about your contractual terms and conditions, university card number, contact details and any carer responsibilities that you tell us about.	We obtain this data from you. We generate this data about you.	So that we are able to deliver your course and can take account of your circumstances when we deliver it.	Variable for different types of personal data, up to a maximum of 6 years after the end of the academic year you cease to be a registered student	Processing is necessary for performance of our contract with you. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London has a legitimate interest in being able to take account of relevant circumstances when providing your course.				

Student Data ROPA - last reviewed January 2022									
Category of personal data	Source of the data	Why we process it	How long we keep it	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal conviction/ criminal allegation grounds	Criminal conviction/ criminal allegation grounds (further information)
Applications for and decisions about financial support, for example scholarships, bursaries and hardship funds.	We obtain this data from you. We generate this data about you. We may receive decisions from third parties that provide financial support.	In order to make decisions about financial support and to ensure that ASU London is encouraging and supporting participation by talented people from all backgrounds.		Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms. Processing is necessary for performance of a task in the public interest.	ASU London has a legitimate interest in receiving, considering and making decisions about financial support in the interests of its students.				
Records relating to degree ceremonies; attendees, catering requirements, names of your guests.	We obtain this data from you. We generate this data about you.	In order to provide and operate degree ceremonies.	These records will be retained for one year from the date on which the ceremony took place.	Processing is necessary for performance of our contract with you.					
Records concerning nominations and decisions to confer prizes, scholarships and awards.	We obtain this data from you. We generate this data about you.	In order to decide who is to receive scholarships, awards or prizes.	1 year for unsuccessful applications/nominations; current year plus 6 for awards made	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London has a legitimate interest in making awards and awarding scholarships and prizes to students, and in fulfilling the wishes of its benefactors.				
Student debtor records and records of debts recovered, records of decisions we take about debts.	We generate this data about you.	In order to consider and take appropriate action. Depending on the circumstances this may include exploring alternative funding options and support that ASU London may offer, instalment payments, considering and implementing other measures to recover debts, such as late payment charges, disciplinary options and/or debt recovery action.	Records of outstanding payments will be retained until they are paid in full (or a final decision is made in relation to recovery of the debt). Information will otherwise be retained for 6 years from the date on which you cease to be a registered student of ASU London.	Processing is necessary for performance of our contract with you. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London has a legitimate interest in being able to collect debts owed by students and former students.				

Student Data ROPA - last reviewed January 2022									
Category of personal data	Source of the data	Why we process it	How long we keep it	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal conviction/ criminal allegation grounds	Criminal conviction/criminal allegation grounds (further information)
Records of any decisions that you tell us about regarding your course, such as options you wish to take, or if you decide to change or withdraw from your course, intermit or suspend your studies. Records of any decisions we make about your wishes, such as whether to allow you to take options, change your course or suspend your	We obtain this data from you. We generate this data about you.	In order to consider and make decisions about your requests.	For 6 years after the end of the academic year when you cease to be a registered student.	Processing is necessary for performance of our contract with you. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London has a legitimate interest in being able to make decisions about your requests in accordance with its regulations and procedures.				
Welfare records, including confidential records about requests for support and counselling, and of support and counselling provided.	We obtain this data from you. We generate this data about you.	In order to provide support and counselling services to our students.	For 6 years after the end of the academic year when you cease to be a registered student.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London and its students have a legitimate interest in providing and having access to support and counselling services.	Explicit consent.			
Mailing lists informing you about events and other information about ASU London.	We generate this data about you.	To enable students to participate in ASU London events.	Your email contact data will be removed from mailing lists within three months of the date on which you cease to be a registered student at ASU London.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	ASU London and its students have a legitimate interest that students are notified of information about ASU London (for example, events).				
Data listed in this table that we hold after the end of your contract with us.	We obtain this data from you. We generate this data about you.	In order to provide references, and so that we have a record if required by a regulator, for archiving and research purposes and/or for the purposes of legal claims.	See periods listed elsewhere in this table.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	ASU London has a legitimate interest in being able to provide references to its students and former students, and in being able to provide information to regulators, and/or defend or make legal claims.	Processing is necessary for the establishment, exercise or defence of legal claims.	ASU London is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of measures or decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.	Processing is necessary for the establishment, exercise or defence of legal claims.	ASU London is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of measures or decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.