



London Metropolitan University  
Students' Union

## PRIVACY POLICY

This privacy policy tells you what to expect when London Met Student' Union (referred to as the SU herein) collects personal information.

We take data privacy very seriously. We have set out below the uses to which we will put the information that we have about you in the delivery of our services, and the legal basis for this, as well as introducing the rights that you have over the way that we use this information.

For the purposes of the General Data Protection Regulation (GDPR) and any subsequent UK legislation covering data protection, we are the data controller (the entity which processes your data). All queries relating to this policy and/or data protection more generally should be referred to the General Manager of the Students' Union.

The SU is registered with the Information Commissioners Office ICO ZA240429

## HOW WE USE YOUR INFORMATION

This policy applies to information we collect about:

- Our members, officers and volunteers
- Users of our websites
- People who use our services
- People who give us feedback, make suggestions, complete questionnaires, polls or make complaints
- Suppliers and agents
- Donors and supporters
- Job applicants and our current and former employees
- The SU processes personal data for the following reasons:
- Administration of Membership Records
- Fundraising
- Advertising, Marketing and Public Relations
- Accounts and records
- Consultancy and Advisory Services
- Employment Administration
- Crime Prevention and Prosecution of Offenders
- Research

Use of data is compliant with the Data Protection Act 1998 and specifically with the 8 data principles that are set out within it:

1. Personal data shall be processed fairly and lawfully

2. Personal data shall be obtained only for one or more specified and lawful purposes (as above), and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

We will also use your information as part of the work to analyse trends in student experience in order to help us improve our services. In order to get a full picture of the student experience we may share some amalgamated data around, membership and extra-curricular activities with the University. We will not use this information to make decisions about you as an individual.

## WEBSITE PRIVACY POLICY

The website Privacy Policy which can be viewed at ....discloses the information practices for the SU website (online activity), including the type of information gathered, how the information is used, and our policy regarding sharing information with others organisations. This Privacy Policy will be published wherever personal information is collected on the site. By using our Site users agree to the terms of the Privacy Policy.

## TYPES OF INFORMATION WE COLLECT

### PERSONAL INFORMATION PROVIDED BY YOU

When you become a London Met student, you automatically become part of the Student' Union unless you opt out. If you are a student at the University the following details, will be provided by the University to the Students' Union, unless you have opted out of Union membership.

- Full name
- Date of birth
- Student ID number
- Enrolment status
- JACS Code
- London Met email address

The details held are the details you gave on registration. If you wish to alter your registration details you can do so by contacting the University. The SU cannot be held responsible for any inaccurate personal details in this information.

## DISCLOSURE OF PERSONAL INFORMATION

Your Personal Information will not be sold, traded, or rented to individuals or other entities. However, we may need to share your Personal Information with third parties to charge your credit card or deliver specific services to you such as support services. These third parties are required not to use your Personal Information other than to provide the services requested by The SU.

We may disclose your Personal Information if we believe in good faith that such disclosure is necessary to comply with any relevant legal and or safeguarding obligations.

## HOW YOU CAN EDIT YOUR PERSONAL PROFILE

We realise that your Personal Information, including your name, address and email address, is subject to change. To the extent that you do provide us with Personal Information, we wish to maintain its accuracy.

Student member details held are the details you gave on registration. If you wish to alter these you need to alter your registration details, you can do so by contacting the University. The SU cannot be held responsible for any inaccurate personal details in this information

In some cases, we provide a means to create an account or a profile of information such information can be edited on site or by contact us.

## DATA SHARING AGREEMENT WITH UNIVERSITY

We have a data sharing agreement with the University. This agreement permits the transfer of part of your personal information (see above) from the University to the Students' Union for the purposes of allowing the SU to provide you with support services, participate in democratic processes, join societies, buy tickets and communicate with you about Annual Reports and Accounts as well as SU activities and campaigns, elicit your feedback and respond to feedback.

You can tell the University that you do not wish the Students' Union to have this data by opting out at enrolment. You can view the university policy on data sharing with the SU here:

## SECURITY OF YOUR PERSONAL INFORMATION

We safeguard the Personal Information you send to us with certain physical, electronic, and managerial procedures.

We utilise appropriate security measures in our physical facilities to prevent loss or unauthorised use of sensitive information. Except as provided elsewhere in this Privacy Policy, we limit access to Personal Information in electronic databases to those persons, including SU employees and full time student officers, in our organisation that have a need for such access.

While we strive to protect your Personal Information, we cannot ensure the security of the information you send to us, and so we urge you to take every precaution to protect your Personal Information when you are on the internet.

When using our online service we suggest that you change your passwords often, use passwords that include a combination of letters and numbers, and use a secure browser. Products and services are available which can help give you privacy protection while navigating the internet. While we do not anticipate breaches in security, if one occurs, we will use all reasonable efforts to correct the problems that led to the breach.

## OTHER WEBSITES(ONLINE SERVICES / SOCIL MEDIA).

Our Web site contains links to other web sites (online services). We are not responsible for the content, accuracy or opinions express in such web sites, and such web sites are not investigated, monitored or checked for accuracy or completeness by us.

Inclusion of any linked web site on or through the Web site or the Service does not imply approval or endorsement of the linked web site by us. If you decide to leave the Web site and access these third-party sites, you do so at your own risk.

#### JOB APPLICANTS, CURRENT AND FORMER EMPLOYEES

When individuals apply to work at the SU (or subsidiary companies), we will only use the information they supply to us to process their application and to monitor recruitment statistics.

Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' we will not do so without informing them beforehand unless the disclosure is required by law.

We retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

Once a person has taken up employment with we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment.

#### TRANSFER TO THIRD PARTIES

Your information may be collected, passed and/or held by the following third parties for the purposes outlined above

- MSL (Who provide our CRM and web based services)
- FGP Global (Who provide our payroll services)

Use of your data will be subject to each of the above Party's Privacy Policies available here.....

#### ACCESS TO PERSONAL INFORMATION

The SU tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to The SU for any personal information we may hold you need to put the request in writing addressing it to the following address; [studentunions@londonmet.ac.uk](mailto:studentunions@londonmet.ac.uk). In some cases, where the compilation of data is considered by The SU to be complex or time consuming we will make an administrative charge of £10. We will give you the information within 40 days as required by law, we will aim to achieve this before 40 days.

If you agree, we will try to deal with your request informally

#### ABOUT THIS NOTICE

This privacy notice was drafted with clarity in mind. It does not provide exhaustive detail of all aspects of The SU's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to [studenstunion@londonmet.ac.uk](mailto:studenstunion@londonmet.ac.uk)

We may occasionally make modifications to this Privacy Policy ("Variations") and, if the Variations are significant, will endeavour to give you prior notification (including, for certain services, email notification of Privacy Policy Variations).

#### FURTHER INFORMATION

You can view The SU's entry on the Data Protection Register; <https://ico.org.uk/esdwebpages/search>

For further guidance on matters relating to Data Protection and Privacy, please refer to Information Commissioner's Office: <https://ico.org.uk/>



London Metropolitan University  
Students' Union

## WEBSITE (ONLINE) PRIVACY POLICY

This policy relates to London Metropolitan University Students Union (hereafter referred to as the SU) website, online activity and social media.

### THE INFORMATION WE COLLECT

We gather both Personal Information and Anonymous Information from you when you visit the Site.

"Personal Information" means any information that may be used to identify an individual, including, but not limited to: a first and last name; e-mail address; a home, postal or other physical address (when using services designed to deliver or send items to you) or other contact information necessary to provide a service that you requested.

"Anonymous Information" means information that is not associated with or linked to your Personal Information; Anonymous Information does not permit the identification of individual persons. We collect Personal Information and Anonymous Information, as described below.

We collect personal information from you at the following points:

- If you are a non student and register to the site for purchases we will record your contact information, username and password. We can collect additional information submitted through registration or via updating your information.
- If you are a student, you will use your University log in and thus your password is not stored on our website or by the SU in any form.
- If you make any purchases through the site, we will record your billing address, however we do not record your payment card details. This information is collected through Sage Pay (Pay Pal), our online payment provider. No card payment details are stored through the site.
- If you email us directly via an email hyperlink or contact form to provide us with feedback or to ask us a question regarding the site, we will record any information contained in such email for a period of up to one year to analyse trends and ensure improvements to the site.

### PERSONAL INFORMATION COLLECTED AUTOMATICALLY

As you navigate the site, certain information will be collected automatically. This data helps us to improve the content of the site and to customise the content or layout of the site for you. We also use this information to form a greater understanding of our website visitors.

### COOKIES

A cookie is an element of data that a website sends to your computer's hard drive while you are viewing a website. The SU uses session cookies (which expire once you close your web browser) to improve your experience using the website by saving the selection you made for your campus. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies. If you do so, however, some areas of the site may not function properly.

The Data is collected when you sign up and register for activities, complete our endorsed surveys or sign up to our email subscription services, apply for a position or volunteer.

## **SUBSEQUENT DATA**

We may add any additional Data that we collect subsequent to initial Data collection, to your record.

## **PERSONAL DATA**

We may hold the following dependent on you interactions with us

- Full name
- Gender
- Preferred pronoun
- Dietary requirements
- Accessibility requirements
- Faculty
- Programme of study
- Expected completion date
- Date of birth
- Email
- Address
- Postcode
- Phone number
- Geo-location data (your geographical location based on your IP address)
- Personal Identifier Number
- Details of specific webpages visited on our Web Site and actions taken on those webpages
- Details of devices used to visit/view the Site
- Actions taken within the Site

## **SENSITIVE PERSONAL DATA**

We may hold the following dependent on you interactions with us

- Racial or ethnic origin
- Political opinion
- Religious, philosophical or similar beliefs
- Physical or mental health
- Sexual orientation
- Commission of criminal offences and/or involvement in criminal proceedings

## **USE**

We may use the Data that you provide for the following purpose

- to deal with your enquiry or application and to provide you with appropriate services which may include sending you further information
- for research purposes and to help us plan and improve our Services. We may contact you ourselves or ask outside research agencies to do so on our behalf.

We only do this if its lawful is lawful as one or more of the following applies:

- you have given consent to this. You may withdraw consent to these uses at any time either by using the opt-out option (where applicable), by emailing us at [studentsunions@londonmet.ac.uk](mailto:studentsunions@londonmet.ac.uk), noting that: (1) this will not affect the lawfulness of processing of your Data prior to your withdrawal of consent being received and actioned; and (2) if we

have asked for your consent to a specific part of the service and you wish to withdraw this consent, you may not be able to partake in some of our services if you do so.;

- it is necessary for us to hold and use your Data so that we can perform our obligations under the contract we have entered into with you for the Purpose(s).

## MORE DETAIL ON HOW WE USE PERSONAL INFORMATION

We collect Personal Information from you in order to fulfil your requests. For example, we may use your Personal Information to process an online purchase or interact with a service or feature to the site. We may also use your Personal Information to send you information that you requested, or to confirm registrations, purchases, or to respond to your feedback.

We may use your email address to notify you of products or services that may interest you, such as events or discussions, in addition we may notify you of recent updates to our site, or to provide you with latest news on The SU.

We may email you for research purposes relating to your membership of the SU, or university life in general. This information is only gathered for reasons associated with improving our services to members, the universities provision to our members and for academic research purposes. Emails may be sent to you from The SU or from its societies, clubs or other groups affiliated to The SU.

You may opt-out from receiving promotional or marketing emails by notifying us at the address specified at the bottom of any unwanted email. If you unsubscribe from a The SU email, you may still receive emails from these affiliated groups and vice versa.

In some cases the opt-out facility is not available unless you have opted out of SU membership completely – to do so you need to write to the University. These instances include transactional or relationship messages, such as emails that are necessary to provide you with confirmation of a completed transaction (such as a purchase, request, or change in your user profile), emails providing notification of changes of terms of service, emails containing important information about the use of the site.

We may create Anonymous Information records from Personal Information by excluding information (such as your name) that makes the information personally identifiable to you. We use this Anonymous Information to perform statistical analyses of users' aggregate behaviour so that we may enhance the content of our services and improve site navigation.

When someone visits our site we collect standard internet log information and details of visitor behavior patterns. We do this to find out things such as the number of visitors to the various parts of the site. We collect this information in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website

## TRANSFER TO THIRD PARTIES

Your information may be collected, passed and/or held by the following third parties for the purposes outlined above

- MSL (Who provide our CRM and web based services)

Use of your data will be subject to each of the above Party's Privacy Policies,

## USE OF AGGREGATED DATA:

Where Data can be aggregated (and anonymised), we may use this without restriction for research purposes (not limited). We are entitled to do this because use of your information for these purposes is for one of the Lawful Uses.

We may also use the Information we gather to notify you about important functionality changes and alterations to our services, or offer of products, services or information that might be of particular interest to you (where you have consented to this). We ensure that any third parties processing your Data on our behalf protect your it as carefully as we do and that they provide an adequate level of protection for your rights as a data subject.

Save as provided below, we will not sell, rent, distribute or disclose your Data without your consent or unless required or permitted to do so by law.

## STORAGE OF DATA

Your information will be stored only for so long as is reasonably necessary in order to carry out the Purpose(s). All Data will be kept private and not shared automatically.

## YOUR RIGHTS

You have the right to request details of the processing activities that we carry out with your personal information through making a subject access request. Such requests have to be made in writing. More detail about how to make a request and the procedure to be followed can be found on the [ICO's website](#).

You also have the following rights:

- The right to request rectification of information that is inaccurate or out of date;
- The right to erasure of your information (known as the "right to be forgotten");
- The right to object to the way in which we are dealing and using your Data;
- The right to restrict the processing of your Data;
- The right to request that your information be provided to you in a format that is secure and suitable for re-use (known as the right to portability).

All of these rights are subject to certain safeguards and exemptions, more details of which can be found on the [ICO's webpage](#). To exercise any of these rights, you should contact the General Manager at the above address.

If you are not happy about the way in which we have processed or dealt with your information, you may file a complaint with [Information Commissioners' Office](#).

More detail about how you may do so [can be found here](#).

## SECURITY OF YOUR DATA

We take reasonable care to comply with the requirements of the UK Data Protection Act 1998 ('the Act') relating to the personal information you supply.

However, as no data transmissions over the internet can be guaranteed to be one hundred percent secure, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk.

## ACCESSING YOUR INFORMATION

We are data controllers for the purposes of the Act and if you wish to request access to your Information held by us, you may contact [studnetsunions@londonmet.ac.uk](mailto:studnetsunions@londonmet.ac.uk)

## MAILING LISTS

If you subscribe to our mailing lists for news releases and other information, we may also ask you to answer various general questions about yourself. You will be asked to specify the areas in which you are interested so that we can tailor the information which we send to you to cover the new products and special offers which we believe you might be interested in.

## NEWSLETTERS

If you subscribe to one of our newsletters and at any time you wish to stop receiving this or any other information you may have requested from us or any other company, please email

[studentsunions@londonmet.ac.uk](mailto:studentsunions@londonmet.ac.uk) or click the Unsubscribe link at the bottom of any communication you may receive from us.

## SURVEYS AND USER GROUPS

We always aim to improve the services we offer. As a result we canvass our customers using surveys. Participation in surveys is voluntary, and you are under no obligation to reply to any survey you might receive from us. Should you choose to do so, we will treat the information you provide with the same high standard of care as all other customer information.

## LINKS TO THIRD PARTIES' SITES

Please note that our website and other online services may provide links to other sites, which may not be governed by this Privacy Policy and you should view the privacy policy of those sites for further information.

## TRAFFIC PATTERNS/SITE STATISTICS

We may monitor customer traffic patterns, Site usage and related Site information in order to optimise your use of the Site and we may give aggregated statistics to a reputable third-party, but these statistics will include no information personally identifying you.

## COOKIES

In addition to the Information which you supply to us, information and data may be automatically collected through the use of cookies. Cookies are small text files the Site can use to recognise repeat users and allow us to observe behavior and compile aggregate data in order to improve services. For example, cookies will tell us whether you viewed the Site with sound or with text on your last visit. Cookies also allow us to count the number of unique and return visitors to our Site. Some of our associated companies may themselves use cookies on their own websites. We have no access to, or control of these cookies, should this occur.

Cookies may be either “persistent” cookies or “session” cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

The law states that we can store cookies on your machine if they are essential to the operation of the application.

The list below explains the cookies we use and why:

Cookie Description	Name	Purpose
<a href="#">Google Analytics</a> cookies, set a first-party cookie in order to anonymously identify when users return to a website.	View the full list of cookie names on the <a href="#">Google Analytics</a> website.	Non-essential cookie to help us track site usage and make improvements to user experience.
Gravit-e cookie – user session	PHPSESSID	Essential cookie which Identifies the user's session. It expires at the end of the session
Gravit-e cookie	eu_cookie_consent_continued	Non-essential cookie which sets when the user accepts cookies. It hides the cookie warning and expires in one year.
Twitter cookies (in conjunction with Twitter's <a href="#">Tailored audiences</a> )	Full details of Twitter's cookie usage is available on <a href="#">their website</a> .	Cookies from Twitter users are used and matched to the cookie IDs of our website visitors to gather analytics and create targeted advertising campaigns to these recent website visitors.

Facebook Javascript (in conjunction with <a href="#">Facebook Pixel</a> )	Although not strictly a cookie, the Facebook pixel uses Javascript code to track activity. You can find out more about the <a href="#">pixel on the Facebook website</a> . To change your settings on what adverts you see via the Facebook pixel, <a href="#">please visit this page</a> .	IDs from Facebook users are used and matched to the IDs of our website visitors to gather analytics and create targeted advertising campaigns to these recent website visitors.
Google cookies when viewing embedded YouTube videos on our site	Full details of cookie names are on the <a href="#">Google website</a> .	Google may place cookies to show users relevant adverts on their platforms and across the web and record the videos users have watched.
Soundcloud cookies when listening to a podcast embedded on our website.	For full details of cookie names are on the <a href="#">Soundcloud website</a> .	These cookies recognise users when they visit our website or use Soundcloud apps. This means that users don't have to log in each time you visit, and we can remember preferences and settings.

If you do not wish to receive cookies from us or any other website, you can turn cookies off on your web browser: please follow your browser provider's instructions in order to do so. Unfortunately, we cannot accept liability for any malfunctioning of your PC or its installed web browser as a result of any attempt to turn off cookies.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org), [www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.civicuk.com/cookie-control/browser-settings](http://www.civicuk.com/cookie-control/browser-settings).

It is important to remember that our Site and/or use of our Services may not function properly if your cookies are disabled. For example, if we begin to tailor the content to your interests as expressed by your browsing behavior this depend on cookies. If you have declined cookies then this kind of service will not be available to you.

#### AMENDMENTS TO THIS PRIVACY POLICY

We may occasionally make modifications to this Privacy Policy ("Variations") and, if the Variations are significant, will endeavour to give you prior notification (including, for certain services, email notification of Privacy Policy Variations). Variations become effective immediately upon posting to the Site and by continuing to use the Site, you will be deemed to accept any such Variations.

Version [1] (May 2018)

# DATA SHARING AGREEMENT BETWEEN

## London Metropolitan University

And

## London Metropolitan University Students' Union

### 1. Overview

- 1.1. The following Agreement governs the provision of registered students' personal data by London Metropolitan University (London Met) to London Metropolitan University Students' Union (MetSU) and identifies the purposes for which that data may be used.
- 1.2. In this Agreement "data controller", "data processor", "personal data" and "sensitive personal data" shall have meaning as defined by the Data Protection Act 1998 (DPA).
- 1.3. London Met and MetSU are separate legal entities, and as such, both are individually registered as Data Controllers with the Information Commissioner's Office (ICO). Both organisations shall be data controllers in common of any student personal data shared. Each organisation is separately responsible processing shared personal data and informing students about this processing via a Student Data Protection Statement. This Agreement will be published on both London Met and MetSU websites.
- 1.4. Students have the right not to be a member of MetSU, but MetSU must not unfairly disadvantage students who opt out of membership, with regard to the provision of services

### 2. Information to be shared

- 2.1. London Met will provide MetSU with the following personal data for enrolled students. To enable London Met to meet its statutory obligations, personal data for student changing enrolment status part way through the academic year will be shared with MetSU;
  - Full name
  - Date of birth
  - Student ID number
  - Enrolment status
  - JACS Code
  - London Met email address
  - Any opt out of membership MetSU received by London Met from the student (if held).
- 2.2. No sensitive personal data will be transferred between London Met to MetSU.

### 3. How students' personal data will be used by MetSU

- 3.1. MetSU will only use the personal data for the following purposes;

- Administration of elections
- Administration of MetSU clubs and societies
- Verification of student identity
- General membership administration
- To allow email communication between MetSU and its members

#### **4. Data transfer and security**

- 4.1. Both London Met and MetSU warrant that all personal data shared under this agreement shall be kept secure and protected against unauthorised access, use or disclosure. Information about identifiable students will only be made accessible to those individuals who need access for a specified purpose.
- 4.2. Membership Solutions Ltd will act as data processor on behalf of MetSU to obtain student personal data directly from London Met. The personal data will be transmitted electronically using a password protected spreadsheet.
- 4.3. London Met will provide MetSU with the student data as set out at 2.1 at certain points – in September, October and February of each academic year, and again in March for MetSU elections.
- 4.4. If MetSU become aware of any potential data breach which involves data shared by London Met, it must be raised with London Met's Information Compliance Officer immediately.

#### **5. Conditions for processing**

- 5.1. MetSU warrants that it will maintain its registration as a data controller with the ICO and ensure compliance with all applicable legal and regulatory requirements relating to the obtaining, retention, processing and use of personal data, including the requirements of the DPA and the Privacy and Electronic Communications Regulations.
- 5.2. MetSU will ensure that all persons employed or engaged by MetSU, together with MetSU's employees, agents, suppliers, consultants and sub-contractors or its Data Processor is fully aware of the DPA and its principles before any processing of student personal data is undertaken.
- 5.3. MetSU will ensure that any Data Processor they use has appropriate security policies and procedures in place, to comply with Principle 7 of the DPA.

#### **6. Restrictions on the use of information**

- 6.1. Any student personal data provided to MetSU by London Met shall not be disclosed to any third party without the express written approval of London Met.
- 6.2. Students shall be given the option in each mailing to opt-out of any future mailings.
- 6.3. Information sent to students shall relate directly to the operational activities, and/or products and services provided by MetSU which are of genuine benefit to students.
- 6.4. MetSU may not, in any circumstances, transfer any student personal data that he processes pursuant to this agreement to any country or territory outside the European Economic Area

without London Met's prior written consent, which consent London Met may withhold in its absolute discretion.

## **7. Student opt out**

- 7.1. London Met will ensure that all enrolling/re-enrolling students are given appropriate information about data sharing including the right to opt-out of the sharing for the purposes set out in this Agreement.
- 7.2. If a student notifies London Met that they wish to opt-out of their personal data being shared with MetSU, London Met will notify MetSU and their data will no longer be included in any transfer.
- 7.3. Where a student exercises their right to opt-out of their personal data being shared, MetSU will ensure that it and any data processor acting on its behalf, destroy and cease processing any personal data already received.

## **8. Data retention**

- 8.1. As Data Controller, MetSU must ensure that personal data transferred under this Agreement is not be kept for longer than is necessary to perform the processing for which it was collected. This applies to both electronic and non-electronic data.
- 8.2. MetSU will ensure that it complies with the retention periods as set out in London Met's retention schedule.

## **9. Review**

- 9.1. This Agreement is to be reviewed 12 months from its effective date and every 12 months thereafter. London Met's Information Compliance Officer will be responsible for initiating this process.

## **10. Termination**

- 10.1. Either party may terminate this agreement by written notice:
  - 10.1.1. Immediately if the terminating party reasonably believes that the transfer of data would contravene the DPA or any other legal requirements;
  - 10.1.2. Immediately if the other party has materially breached this Agreement and either the breach has not been remedied within a reasonable period or is irreparable; or
  - 10.1.3. on 3 months' notice.

## **11. Indemnity**

- 11.1. MetSU as receivers of information covered under this Agreement will indemnify London Met against any costs, claims and proceedings, damages, penalties, and other liabilities incurred by London Met through MetSU's processing of the personal data or breach of this Agreement by MetSU or its agents.

## **12. Law and Jurisdiction**

12.1. Any disputes between the parties arising out of the conditions or breach of this Agreement will be decided in accordance with the laws of England and Wales and will be subject to the exclusive jurisdiction of the courts of England and Wales.