

# **PRIVACY NOTICE - Cornwall Plus**

The purpose of this notice is to explain how Cornwall Plus – a subsidiary of Falmouth Exeter Plus ("FX Plus") will collect and process your personal data. This notice also tells you which third parties we may share your personal data with. All references to FX Plus should be taken to include Cornwall Plus.

FX Plus is a data controller and will only process your personal data in accordance with the current data protection legislation. Until 24 May 2018 we shall process your personal data in accordance with the Data Protection Act 1998 (or DPA for short). From 25 May 2018, we shall process your personal data in accordance with the General Data Protection Regulation (or GDPR for short).

The Data Protection Officer for FX Plus is Jonathan Hocking, who can be contacted by:

Email: dataprotection@fxplus.ac.uk

Telephone: 01326 259431

Writing:
Data Protection Officer
Falmouth Exeter Plus
Penryn Campus
Treliever Road
Penryn
Cornwall
TR10 9FE

This notice will be reviewed annually to ensure continued compliance with current data protection legislation and to reflect best practice.

By booking services through Cornwall Plus, you agree to FX Plus processing your personal data (including sensitive personal data), for the purposes and in the manner set out in this notice.

# What information is being processed about you

The type of personal data and sensitive personal data we may process about you consists of:

- Your full name and your student number
- Your home address and your contact details including email and telephone number
- Other discrete data such as the device ID of your smartphone, tablet or similar mobile devices



# How and why your information is processed

Your personal data is processed by FX Plus for the purpose of managing your application for accommodation and to fulfil its contractual obligations to you in the provision of your accommodation. It may also be collected to fulfil legal obligations and/or regulatory duties that it owes to its regulators and to other third parties.

Accommodation Services collects your personal data from the following sources:

- Personal details from your site registration
- Information provided when you place a booking or order
- Information provided by you when you subscribe to our newsletter
- Information provided by you when you respond to one of our surveys
- Information provided by you when completing one of our forms

# How your personal data will be used

Here are some of the ways we will use your personal data. This list is not exhaustive, but is intended to provide you with an idea of the things that we may need to do, to manage the application and offer process and your provision of accommodation. We will not use your data for any purpose other than those listed and for maintaining your accommodation records and/or protecting your wellbeing.

- Management of your booking/Event
- Administration of the booking process
- Maintaining communication with you regarding your booking/order
- Processing of financial transactions
- The sending of periodic email newsletters/marketing communications that you have consented to.

This processing is necessary for:

- The performance of the contract between you and FX Plus for the provision of your service
- FX Plus's compliance with any statutory obligations; and/or to protect the interests of the data subject or another person.

#### **Sensitive Personal Data**

Some of the personal data FX Plus processes about you may be "sensitive personal data". This category of personal data will be subject to additional protections. Sensitive personal data for example is information about your racial or ethnic origin, religious or similar beliefs, physical or mental health or condition. This information is processed for



some of the reasons set out above, and will only be processed where essential for the provision of your service.

# Who your personal data is shared with

Personal data will only be sent to people who need to know this information to support you.

In processing your personal data and/or sensitive personal data, FX Plus may have reason to share this data with a third party:

• In exceptional circumstances where we are concerned about your safety/wellbeing or if we consider you to be a risk to yourself or others we may share limited information both internally and with relevant third parties (for example Ambulance, Police, NHS Trusts etc.) to ensure appropriate support is available.

# What happens with your personal data

On departure of your accommodation at the end of your accommodation agreement, Cornwall Plus will retain your personal details and accommodation record for a period of 18 months. This data is retained in order to assure good service in case of repeat booking, and for statistical analysis to monitor our performance.

# Our reasons for processing your data

What we do	Our legal basis under GDPR
Deliver our service to you	Article 6(1)(b) – this is necessary for the
	performance of our contract with you
	Article 6(1)(f) – this is necessary for our
	legitimate interests.
Contact you with regard to your booking	Article 6(1)(b) – this is necessary for the
	performance of our contract with you.
	Article 6(1)(f) – this is necessary for our
	legitimate interests.
Share your details with other FX Plus	Article 6(1)(f) – this is necessary for our
teams to ensure the safety and wellbeing	legitimate interests
of you and other accommodation	
residents	

# **Your Rights**

You are in complete control. You can object to the use of your personal data at any time. Though in some cases we may not be able to provide your requested service



where the information processing is an integral part of the service. We will tell you if this is likely to be the case.

Subject to some legal exceptions, you have the right to:

- •request a copy of the personal information Cornwall Plus holds about you;
- to have any inaccuracies corrected;
- •to have your personal data erased;
- to place a restriction on our processing of your data;
- •to object to processing; and
- •to request your data to be ported (data portability).

To learn more about these rights please see the <u>ICO website</u>.

Please address any such requests to the FX Plus Data Protection Officer.

# What can you do if you are unhappy with the way your data is being processed

FX Plus is transparent about its processing of your personal data. However, should you have any queries about how FX Plus processes your personal data; you should contact our Data Protection Officer by emailing <a href="mailto:dataprotection@fxplus.ac.uk">dataprotection@fxplus.ac.uk</a>.

If you think that any of your personal data held by Falmouth Exeter Plus is incorrect (for example if you change your contact details), please let us know so that we can update our records accordingly.

You have the right to complain to the Information Commissioner (<a href="https://ico.org.uk">https://ico.org.uk</a>) if you are not satisfied with the handling of your personal data by FX Plus.

The Information Commissioner's Office can be contacted at the following address:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF