

## PRIVACY NOTICE

SUMS is committed to protecting your privacy, providing clear information about how your personal data is processed and complying with data protection law.

This Privacy Notice sets out how SUMS collects and uses your personal information. Please read this Privacy Notice carefully. This privacy policy is provided in a layered format so you can click through to the specific areas set out below:

1. <a href="#">Introduction</a>
2. <a href="#">Who do we collect personal information from?</a>
3. <a href="#">What personal information do we collect and process?</a>
4. <a href="#">What do we use your personal information for?</a>
5. <a href="#">Who do we share your personal information with?</a>
6. <a href="#">How do we keep your personal information safe?</a>
7. <a href="#">How long do we keep your personal information?</a>
8. <a href="#">Automated decision making and profiling</a>
9. <a href="#">International data transfers</a>
10. <a href="#">Your rights</a>

### 1. Introduction

#### About us

In this Privacy Notice references to "we" or "us" or "our" are to:

Southern Universities Management Services (SUMS) a company limited by guarantee. Registered in England and Wales No. 02732244, Charity Number 1042175. Registered office: The University of Reading, Whiteknights, Reading, RG6 6BU

We act as data controller in respect of the personal information that we process.

If you have any questions about how we collect, store or use your information, or you would like to update the information we hold about you, you may contact [sums@reading.ac.uk](mailto:sums@reading.ac.uk) or by telephone 0118 935 7073.

#### About this Privacy Notice

This Privacy Notice tells you what personal information we collect, and why we need it, how we use it and what protections are in place to keep your personal information secure.

This Privacy Notice applies to:

- visitors to our website, <http://www.sums.org.uk/> (**Website**);
- staff members, contractors and subcontractors of SUMS members; and
- staff members, contractors and subcontractors of SUMS and Procurement Shared Service (PSS) non-member clients.

A list of SUMS members is available [here](#).

The type of personal information we collect about you and the personal information we obtain from third parties - depends to some extent on your circumstances, your role within a member or non-member institution and our legal obligations.

This Privacy Notice was last updated on 29 April 2021.

#### **What is 'personal information'?**

Your 'personal information' means information about you, and any information from which you can be identified - either by reference to an identifier (for example your name, location data or online identifier (IP address)) or from factors specific to your physical, cultural or social identity. It does not include data where the identity has been removed (anonymous data).

## **2. Who do we collect personal information from?**

#### **We may collect personal information:**

- From you, where you visit our Website, attend a SUMS event, participate in a SUMS or PSS assignment, complete one of our online forms or contact us; and
- From SUMS members and customers.

## **3. What personal information do we collect and process?**

#### **Information provided to us by you**

Personal information provided to us by you may include, as applicable:

- information, such as your name, surname, and contact details, that you give us by entering information into our Website or online forms;
- information, such as your name, surname, and contact details, shared by event attendees; e.g. via feedback forms and input into group sessions;
- information you provide when participating in assignments SUMS undertake on behalf of your employer, including the notes taken at meetings with you

and from the documentation you provide; and

- information that you give us when corresponding with us by email, by telephone, or by post

#### **Information provided to us by third parties**

Personal information provided to us by third parties such as SUMS members and non-member clients via email (or other electronic format), hard copy, by telephone, or in person may include:

- your name and contact details; and
- your employment details.

#### **Information collected automatically by us**

Personal information collected by us automatically, when you visit our Website, may include:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions and operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our Website (including date and time), what you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

#### **4. What do we use your personal information for?**

##### **What your personal information is used for**

##### **Information you provided to us or provided to us by third parties**

If you shared your personal information with us: (a) as an event attendee; (b) as a participant in assignments SUMS undertake on behalf of your employer; or (c) provided to us by a third party such as a SUMS member and non-member then we may use that information for the following purposes:

- for the purposes of administration in relation to SUMS members (please see a list of our members [here](#));
- for the purposes of contracts entered into between SUMS and its member and non-member clients;

- to send members emails regarding SUMS events, services, and other membership benefits.

When you provide us with your information by (a) contacting us through our Website or (b) by contacting us email, by telephone, or by post, then we will use this information to:

- provide you with any information or assistance requested by you.

In the above circumstances, the legal basis for processing the data is the legitimate interest of SUMS and its members' and non-member clients in order to conduct business operations.

We may also use your personal information to:

- send non-members marketing emails regarding SUMS membership, events, and other SUMS and PSS products and services.

In these circumstances, the legal basis for processing the data is your consent.

Please note that you have the right to withdraw your consent to this processing at any time by contacting us using the details set out in the **Introduction** section above. If you choose to withdraw your consent, this will not affect the lawfulness of the processing that occurred prior to the withdrawal.

#### **Information collected automatically by us**

We will use this information:

- to administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our Website to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our Website, when you choose to do so; and
- as part of our efforts to keep our Website safe and secure.

In these circumstances, the legal basis for processing the data is our legitimate interest in administering and improving our Website and its features, and keeping our Website secure.

## 5. Who do we share your personal information with?

### Your personal information

We may share your personal information with the following third parties, where relevant:

- our members – to enable members to contact each other and facilitate collaboration;
- our suppliers;
- our staff, associates, agents and contractors – to enable us to deliver the core business of consultancy and procurement services;
- our professional advisors;
- third party contractors that provide services to us (such as MailChimp, SurveyMonkey, Bristol Online Surveys (**BOS**), and the University of Reading); and
- analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may also share your information with third parties such as regulatory authorities, or where we are under a legal obligation to disclose your information (for example where we are required to share information in accordance with legislation, to prevent fraud and other criminal offences, or because of a court order). We may disclose your information in order to enforce our legal rights or to protect the legal rights of our members or others.

## 6. How do we keep your personal information safe?

### What we do

We have security measures in place to restrict access to personal information, to guard against unauthorised or unlawful processing of personal information and against damage to, accidental loss or destruction of, your personal information.

The security measures applied include:

- hard copy records and manual files are kept to a minimum;
- electronic records are kept in an electronic filing system with access restricted to SUMS staff; and
- all records are kept in accordance with the SUMS Records Retention Schedule, a copy of which is available on the SUMS website <http://www.sums.org.uk/>

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### Third parties

The terms of our contracts with third party contractors include obligations on them in relation to what personal information they can process and what they can do with that information. Our third party contractors include:

BOS: <https://www.onlinesurveys.ac.uk>

MailChimp: <https://mailchimp.com>

SurveyMonkey: <https://www.surveymonkey.com/>

University of Reading: <http://www.reading.ac.uk/>

## 7. How long do we keep your personal information for?

We keep your personal information only for as long as is reasonably necessary for the purposes for which we process your personal information. These purposes are listed at section 4 of this Privacy Notice.

Your personal information is kept for as long as your institution remains a member of SUMS, or if your institution has procured non-member services from SUMS within the last twelve months.

## 8. Automated decision making and profiling

### What we do

No automated decision making or profiling is carried out by SUMS.

## 9. International data transfers

We do not transfer your personal data outside of the UK. Where our third party contractors process your personal data outside of the UK they are required to ensure that a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- By ensuring the relevant country is deemed to provide an adequate level of protection for personal data.
- By using specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

## 10. Your rights

You have certain rights under data protection legislation in relation to the personal information that we hold about you. These rights apply only in particular circumstances and are subject to certain exemptions such as public interest (for example the prevention of crime). They include:

- the right to access your personal information;
- the right to rectification of your personal information;
- the right to erasure of your personal data;
- the right to restrict or object to the processing of your personal data;
- the right to data portability;
- the right to complain to the Information Commissioner's Office about the use of your personal information; and
- The right to object to direct marketing.

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

request in these circumstances.

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

If you would like to contact us about your rights, please see the contact details in section 1.