Events and Conferences Privacy Notice

## Who we are and how to get in touch

SOAS is a higher education institution, and we are the Data Controller in respect of your personal data, which means we decide why and how we process information about you. We have appointed a Data Protection Officer whose role is to inform and advise us about, and to ensure that we remain compliant with, data protection legislation. The Data Protection Officer should be your first point of contact if you have any queries or concerns about your personal data.

Our current Data Protection Officer is the Information Compliance Manager who can be contacted at dataprotection@soas.ac.uk or 0207 898 4817.

If the Data Protection Officer is unavailable, you can contact the Records Manager by email at dataprotection@soas.ac.uk, or by post at the address below:

Information Compliance Office, SOAS University of London, 10 Thornhaugh Street, Russell Square, London WC1A 0XG.

## What is this document and why should you read it?

This notice explains how and why SOAS processes personal data about individuals who express an interest in attending events and conferences at SOAS, who attend such events and conferences and who opt to receive information about future events and conferences at the School.

You should read this notice so that you know what we are doing with your personal data.

## How is your personal data used?

We will process your personal data for the following purposes:

* To communicate with you about events and conferences in which you have expressed an interest, may have an interest or are due to attend, either as a guest, a speaker or an organiser
* To record individuals who expressed an interest in attending an event, who are registered to attend or have attended events to allow us to properly manage the event
* For the purpose of monitoring attendance of people at events and conferences, as part of the School’s health and safety arrangements
* To make reasonable adjustments for dietary requirements or disabilities which you declare to us
* To record views and concerns of event attendees to help us plan future events
* Where necessary to take payments from you for events and conferences which involve an entry fee, or where attendees can make discretionary payments for services or products related to the event
* Holding an accurate record of correspondence with you
* Maintaining a photographic record of events held at the School
* General administration and organisation of event and conference bookings
* To record offers of philanthropic support
* With your consent, to send newsletters and otherwise communicate with you about future events, activities and initiatives

## What information does SOAS hold about you, and where do we get it from?

SOAS will collect the following information from you when you sign up to register your interest in an event or receiving information about future events, or when you communicate with us by phone, email, or any other means:

* Contact details
* Biographical information
* Dietary requirements
* Declared disabilities
* Room booking requests
* Financial information

We will generate the following information:

* Photographs of you at events (unless you have opted out)
* CCTV footage
* Room booking data

## Why do we process your personal data?

When we process your personal data, we need a ‘lawful basis’ to do so. We have identified the conditions under which we lawfully process your data, and these are:

* Where processing is necessary to enter into a contract or to take steps to enter into a contract with you at your request
* Where processing is necessary for the purpose of the legitimate interests of the School, the data subject or a third party, except where these interests are overridden by your data protection rights and freedoms
* Where you have given us your consent

We will process your personal data because it is in our or your legitimate interests to fully administer your participation in an event (as an organiser, speaker or attendee), to maintain security at the event, and to provide appropriate facilities for all attendees.

## What is Special Category Data and how will we process it?

For some activities SOAS will need to process your Special Category Data and criminal convictions data, which are types of personal data the GDPR and Data Protection Act (2018) considers more sensitive than others. When we process these types of data, we need to apply additional protections. The GDPR Article 9 (1) states that the following types of data are Special Category:

* Ethnic or racial background
* Religious or philosophical belief
* Political opinions
* Sexual life
* Sexual orientation
* Health
* Trade Union membership
* Genetic data
* Biometric data, in so far as it permits identification of an individual

We will process your special category data in instances where the School’s security and health and safety protocols record accidents or emergency incidents which occur during events or conferences. This could include information captured on CCTV, or in accident reports.

We will also process information about any disabilities you declare to us to enable us to make reasonable adjustments to facilitate your attendance at and enjoyment of the event.

SOAS must rely on an additional condition in Article 9(2) of the GDPR to process these data types. The condition we rely on to process your disability and other health data which you declare is the substantial public interest in complying with the Equality Act (2010) and relevant health and safety legislation.

If we process your criminal convictions data, for instance if a security incident is captured on our CCTV cameras which is then referred to the police for investigation, we will do so in accordance with

Part 2 Chapter 2 section 10 of the Data Protection Act (2018), where processing is in the substantial public interest, being necessary for the prevention and detection of unlawful acts.

## Who do we share your personal data with, and why?

SOAS does not transfer or share the personal data you supply to us without your consent or another lawful basis for the data sharing (e.g. contractual).

The School runs events and conferences through its professional services departments, academic departments and interdisciplinary research centres. Some SOAS organisers will use platforms provided by various external data processors to allow individuals to express interest in an event, or sign up to attend.

**Mailchimp**

Some departments and centres allow interested individuals to provide their contact details to the organisers of events by subscribing to a list hosted by Mailchimp. Mailchimp is a company registered in the United States, and is certified by Privacy Shield, a contract between the EU and the United States which provides a framework for the safe transfer of personal data between the jurisdictions.

**EventBrite**

Some departments and centres allow interested individuals to sign up to attend events through EventBrite. EventBrite is a company registered in the United States, and is certified by Privacy Shield, a contract between the EU and the United States which provides a framework for the safe transfer of personal data between the jurisdictions.

**Facebook**

SOAS allows individuals to express an interest in events and conferences through Facebook pages. You can also sign up to events and, where necessary, pay the ticket fee through SOAS’s Online Store, send us a message to ask for further information about our events, or send us feedback or opinion. Facebook is a company registered in the United States, and is certified by Privacy Shield, a contract between the EU and the United States which provides a framework for the safe transfer of personal data between the jurisdictions.

**Our events and conferences booking system**

SOAS uses a third-party system to manage booking records for conferences and events. The supplier of the system stores personal data in the cloud, and may store data in countries outside of the European Economic Area. The supplier has entered into contractual arrangements with its data hosting providers to ensure individuals’ access to legal rights and judicial remedies are protected.

In addition to the data sharing described above, we may also need to share personal data with the police, regulatory bodies, the courts or our legal advisors where there is a legal obligation or an overriding public interest in doing so.

## Do we transfer your personal data outside the EEA?

We will only transfer your personal data outside the EEA in circumstances where our data processor is covered by an existing framework agreement between the EU and a third country, such as Privacy Shield, or under the European Commission’s Standard Contractual Clauses.

Any other transfer of personal data outside the EEA would only occur if the following safeguards are met:

* The party receiving the personal data is based in a country with an Adequacy Decision from the European Commission, meaning the country’s laws provide a level of data protection at least equivalent to the protection offered by EU law.
* With your explicit consent
* Where it is justified for important reasons of public interest

## How long will we keep your personal data?

We will not keep your personal data for any longer than is necessary to support our business functions, comply with any relevant legislation or regulatory requirements, and enable all parties to establish, uphold and defend legal claims. For this reason, the personal data that we collect in running events and conferences needs to be retained for different periods of time.

If you express interest in an event or conference and join a mailing list (we will always tell you if this will happen), we will hold your information until you tell us to stop. If you are not added to a mailing list, we will retain your data for no longer than four months from the date of the event. If you attend an event, correspond or provide feedback to us about the event, we will hold the data you give us for one year from the date of the event.

CCTV records are held for 15 days from the date of recording. Visitor sign-in sheets to SOAS buildings are held for 1 year from the date of the event. Other security records, such as accident reports, are held for 6 years for regulatory purposes.

Attendance records from events are held for one year from the date of the event, and will include all the information you provide us with when you sign up for the event (including any dietary, disability or health information).

Photographs of events are retained for their useful life, and will be held in perpetuity in the School Archive if they are considered to have historic value following professional appraisal.

## What are my rights?

You have certain legal rights in relation to your personal data. If you exercise your rights by asking for access to your data, for data to be corrected, or if you object to our processing or want to restrict processing, we have one month to respond to your request by satisfying the terms of the request, or explaining why we are unable to do so (e.g. because an exemption applies, or we feel that our legitimate interest in processing does not override your rights and freedoms). Some legal rights may not be available depending on the lawful basis under which we are processing your data, as shown in the table below.

As a registered student, we may process your personal data under the following lawful bases:

1. Consent
2. Contract
3. Legal obligation
4. Public interest or a public task performed under official authority vested in SOAS
5. Vital interests
6. Legitimate interests

### The table below shows which rights are available to you under each lawful basis:

|  |  |
| --- | --- |
| Lawful basis | Individual’s rights |
| Access | Correction | Restriction | Erasure | Data Portability | Objection |
| Consent | Y | Y | Y | Y (right to withdraw consent) | Y | Y (right to withdraw consent) |
| Contract | Y | Y | Y | Y (if no longer needed for contractual/legal purposes) | Y | N |
| Legal obligation | Y | Y | N | N | N | N |
| Vital interest | Y | Y | N | Y | N | N |
| Legitimate interest | Y | Y | Y | Y | N | Y |

**Right of Access**: You have the right to the information which the School holds about you. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, the School may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. A guide on how to make a ‘Subject Access Request’, including requirements for proving your identity, is available on our website here: [Making a request for your data](https://www.soas.ac.uk/infocomp/dpa/access/)

**Right to correct your data**: If you believe data we hold about you is incorrect as to a matter of fact, or if your information changes, please write to the organisers of the event or conference.

It is your responsibility to keep your information up-to-date, and to notify us of any changes to the information we hold about you. This may involve amending, adding to or removing information we hold on you.

**Right to restrict processing**: If you believe SOAS is processing your data unlawfully, you can ask us to restrict the processing of your data whilst we investigate your complaint. When we restrict your data we will not do anything with it other than store it securely, in order to mark it as restricted.

**Right to erasure**: If we process data with your consent (for instance, if you opt-in to receiving promotional material such as newsletters, magazines etc.) then you can ask for your data to be expunged (completely deleted) at any time. You can also ask us to delete your data when we no longer need it to show evidence of our contractual relationship.

**Right to data portability**: If you provide us with electronic data which we have your consent or a contractual reason to process, you can ask for a copy of the data in a machine-readable format, or you can ask us to transfer it to another IT environment on your behalf.

**Right to objection**: If we process your data with your consent or in our legitimate interests, you may object to the processing. For example, you might opt-out of receiving alumni newsletters.

If SOAS corrects, restricts, or deletes your personal data at your request and that data has been passed to a third party or third parties for the same purpose, SOAS is responsible for ensuring that those bodies also fulfil the terms of your request unless it proves impossible or requires disproportionate effort.

If you wish to exercise any of these rights, please contact our Data Protection Officer (contact details in the first section of the Notice here: [Who we are and how to get in touch](#_Who_we_are)) in the first instance.

## Updates to this notice

We will review this notice on an annual basis, and will make updates as necessary to reflect changes to the type of personal data that we process and/or the way in which it is processed. This notice is published online on the following page: [Events and Conferences Privacy Notice](https://www.soas.ac.uk/infocomp/dpa/privacy-notices/rootinfocomp/dpa/events/)

If we make any major updates to the content of the notice, because we change the way we are using your data, we will contact our community in the most proportionate way i.e. by using our online social media channels such as Facebook, Twitter etc.

## Who regulates the use of personal data?

If you think SOAS is processing your data unlawfully, you have the right to lodge a complaint with the Information Commissioner’s Office, which is the UK data protection regulator. More information can be found on the Information Commissioner’s Office website at https://ico.org.uk/