Southampton



Privacy Notice – UoS and Active 4

Introduction

The University of Southampton's Sport & Wellbeing (Be Active programme) is working with the Southampton University Students Union (SUSU) and British University College Sport (BUCS) to provide a free sport participation program for students at the University of Southampton. We value your privacy, and we recognise the need to process your data in a fair and lawful manner.

Playwaze the owner and developer of the App is the Data Controller. The University of Southampton, SUSU and BUCS are the "joint data processors". This means that we are responsible for deciding how we hold and use data about you. You are being given a copy of this privacy notice because you have provided us with your data to enable you to take part in the BUCS4 program. It makes you aware of how and why your data will be used and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation (GDPR). Our registration number with the Information Commissioner's Office is Z6801020.

Data refers to the information that we hold about you from which either on its own or in combination with other information you can be identified and may include names, contact details, identification numbers and online identifiers. A list of the data we collect is set out below. Processing means doing anything with your data, such as collecting, recording or holding the data as well as disclosing, destroying or using the data in any way.

This notice may be amended from time to time and you can obtain a current version at: <u>https://www.southampton.ac.uk/sportandwellbeing/does-you-good/be-active.page</u>

Data Protection Principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

What data does the Active 4 (playwaze) app collect?

In connection with providing you with activities we will collect, store, and use the following categories of data about you and/or your child:

- Institution;
- Course End Date;
- Subject Area of Study;
- Date of Birth;
- Gender;
- Current physical activity levels;
- Ethnicity;
- Home postcode;
- Student ID number;
- Your active achievements inputted into the application

What if you do not provide your data?

If you fail to provide data when requested, we may not be able to successfully set up your account on our membership system and provide you with access to our activities and facilities.

Why does the Active 4 app process data?

We need to process your data to enable us to fulfil our contract with you and to enable you to access the activities we offer under the terms of that contract.

It also enables us to:

- Resolve general enquiries;
- Report on key statistics that feed into the UoS Sports Strategy;
- Report on key statistics that feed into the BUCS and UoS agreement;
- Enhance knowledge on current requirements and trends in physical activity;
- Monitor attendance and activities;

How does the BUCS4 app uses Special Category Data

We may collect, store and use "special categories" of more sensitive data this could include your halls of residences to enable us to run real-time challenges to create communities.

We will only process sensitive data where you have given your explicit consent unless we are legally obliged to do so.

Right to withdraw consent

Where you have given your consent to us processing your special category data you have the right to withdraw that consent for processing at any time.

To do so you delete your Active 4 profile, or you can contact: <u>sportandwellbeing@southampton.ac.uk</u>, who will support you in completing this process.

Once we have received notification that you have withdrawn consent, we will no longer process your data and, subject to our record retention schedule, we will dispose of your data securely.

If you do withdraw your consent this may mean that we can no longer provide you access to certain activities.

Processing for limited purposes

We will only process your data for the specific purpose or purposes that we tell you about, or if specifically permitted by the Data Protection Act UK 2018 and will only process your data to the extent necessary for that specific purpose or purposes.

Accuracy

We will keep the data we store about you accurate and up to date as relevant to the purpose or purposes for which we process it. Data that is inaccurate or out of date will be destroyed. Please notify us if your details change or if data, we hold about you is inaccurate.

How will your data be collected?

We obtain your data directly from you.

How will your data be secured?

Playwaze store your data in Amazon Web Services (AWS) data centres located in the European Economic Area (EEA). AWS maintains the highest standards of security compliance and certification. <u>AWS Cloud Security information</u>

We may, under certain circumstances e.g. a security breach in our EEA Data Centre, transfer your data to AWS data centres outside the EEA. Where data is moved or stored outside of the EU, providers are vetted for compliance with the <u>EU-US Privacy Shield</u>, ensuring that your data is treated as safely and securely as it would be within the EEA and under Data Protection Legislation.

The University have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so. In addition, we limit access to your data to those employees of the University, SUSU staff, BUCS staff and the Administrator of Playwaze who have a business need-to-know. They will only process your data for the purpose detailed above and they are subject to a duty of confidentiality.

Holding and retaining your data

Playwaze will keep your Personal Data for as long as is necessary which is usually the life of our relationship. We may however be required to retain personal data for a longer period of time to ensure we comply with our legislative and regulatory requirements. We review our data retention obligations to ensure we are not retaining data for longer than we are legally obliged to.

The University will retain your data for different periods depending on when you delete your profile. After this period, we will securely destroy your data in accordance with our retention schedule.

Who has access to your data?

Your data and will be viewable by Sport and Wellbeing staff, the Sport Zone Administrator in the SUSU, two BUCS staff and the Administrator of the Playwaze app.

A link to the BUCS Privacy notice statement can be found here: <u>https://www.bucs.org.uk/legal/privacy-policy.html</u>

A link to the Playwaze Privacy Notice statement can be found here: <u>https://playwaze.com/privacy/</u>

Automated decision making and profiling

None of the data collected about you will be used as part of any automated decision making or to build a profile .

Your rights

You have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing; and
- ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise these rights please use our <u>online form</u> or write to:

The Data Protection Officer Legal Services University of Southampton, Highfield Southampton, SO171BJ Email: <u>data.protection@soton.ac.uk</u>

Or to directly contact Playwaze:

Attention: Playwaze Data Protection Compliance Manager

Email address: team@playwaze.com

Postal Address: The Lansbury Estate, 102 Lower Guildford Road, Woking, GU21 2EP

Unwanted communications

If at any stage you are concerned about the content of any communications from Sport & Wellbeing e.g. unwanted marketing information or you wish to change how we communicate with you please contact us at: sportandwellbeing@southampton.ac.uk.

Further information

We also have additional policies and guidelines concerning particular activities. If you would like further information please see our Publication Scheme at: http://www.southampton.ac.uk/about/governance/regulations-policies-guidelines.page#publication_scheme.

If you are unhappy with the way that we have handled your data and/or your child's data you can contact us at: sportandwellbeing@southampton.ac.uk or contact the Information Commissioner's Office. See their website at: https://ico.org.uk/.