



## 1. Introduction

### About Us

In this Privacy Notice references to "we" or "us" or "our" are to: Higher Education Purchasing Consortium Wales (HEPCW, 8<sup>th</sup> Floor, 30-36 Newport Road, Cardiff, CF24 0DE. 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 us through the following email address [hepcw@wales.ac.uk](mailto:hepcw@wales.ac.uk) .

### 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, [www.hepcw.ac.uk](http://www.hepcw.ac.uk) (website);
- staff members, contractors and subcontractors of HEPCW members;
- and staff members, contractors and subcontractors of suppliers appointed to framework agreements available to HEPCW members.

A list of HEPCW members is available <http://www.hepcw.ac.uk/members/>

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 a supplier (if applicable) and our legal obligations. Any changes to this Privacy Notice will be highlighted to you in an updated Privacy Notice.

### 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

## 2. Who Do We Collect Personal Information From?

We may collect personal information:

- From you, where you visit our Website or contact us;
- From HEPCW members;
- When you attend a HEPCW or HEPCW partners event; and
- From suppliers appointed to Framework Agreements available to HEPCW members.

### 3. How Do We Collect Personal Information?

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

Personal information is provided to us by you when you contact us by email, by telephone or by post.

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

Personal information is collected by us automatically, when you visit our Website.

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

Personal information provided to us by third parties such as HEPCW members and suppliers may include:

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

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

#### **Information you give to us**

We will use this information:

- to provide you with any information or assistance requested by you.
- to send you emails regarding HEPCW events, training and other membership benefits. We may pass your details on to framework suppliers so that they may contact you about their 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.

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

In these circumstances, the legal basis for processing the data may be the legitimate interest of HEPCW, its members and third party suppliers to conduct business operations.

## 5. Who Do We Share Your Personal Information With?

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

- approved suppliers (only those on consortia framework agreements);
- other Members, only where relevant;
- and mailing fulfillment suppliers for distribution of materials where relevant.

We may also share your information with third parties such as Member benefit providers and 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?

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 but those kept are in locked filing cabinets; and
- electronic records are kept in an electronic filing system with access restricted to HEPCW staff.

### **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>

HE Contracts: <https://www.hecontracts.co.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: What do we use your personal information for?

Your personal information is kept for as long as your institution remains a member of HEPCW. In the case of suppliers, bidder information will be held in line with the requirements of the Public Procurement Regulations, whilst marketing contacts will be deleted at the end of the contract term.

## 8. Automated Decision-Making and Profiling

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

## 9. International Data Transfers

We do not transfer your personal data outside of the EEA. Where our third party contractors process your personal data outside of the EEA they are required to ensure the adequate protection of your personal data.

## 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

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