

## Privacy Notice – Physical (In Person) and Digital (Online) Events

**The Data Controller of the information being collected is:** The University of the Highlands and Islands (UHI), Executive Office, 12b Ness Walk, Inverness IV3 5SQ. Phone: 01463 279000. The data collected may be used by UHI or any of the [UHI partner colleges](#) for the purposes listed in this notice.

For any queries or concerns about how your personal data is being processed you can contact the relevant Data Protection Officer at [dataprotectionofficer@uhi.ac.uk](mailto:dataprotectionofficer@uhi.ac.uk)

**This privacy statement relates to the following process:**

**Arrangements for both physical (in person) and digital (online) events involving speakers, guests, students, and members of the public.**

**Some processes are common to all kinds of events. Where specific processes apply to physical (in person), or digital (online) events, this is highlighted.**

**Your information will be used for the following purposes:**

Purpose 1: Event registration and delivery – All	We will collect the data we need to register you for the event, provide you with tickets and access to the event. We will communicate any updates or changes to the event and may send you reminders.
Purpose 2: Security and Health and safety – Physical Events	<p>We may be required to populate an event delegate list for the venue’s safety purposes and risk assessment under the Fire (Scotland) Act 2005 part III. We may need to process your data for Health and Safety purposes depending on the nature and venue of an event.</p> <p>Your data may be used, and you may be contacted to ask for more data, for assessment by the security teams of VIPs (such as royalty) who will be attending an event.</p> <p>The event invitation will always indicate if this processing will take place. If this processing becomes necessary after you have registered for an event we will contact, you to inform you of this and allow you to withdraw from the event.</p>
Purpose 3: Recording and publication of events - All	<p>We may record the event and make it available to the public by publishing it on the UHI website or other online video hosting platforms (such as YouTube).</p> <p><b>Please read the international transfer section for more information about publication of recordings.</b></p> <p><u>Physical Events:</u> We will where this is possible provide options for guests and members of the audience to avoid being recorded, and to be able to ask questions without being recorded.</p> <p>This may not always be possible depending on the nature of the event. The arrangements will be explained in advance and on the</p>

	<p>day and as far as possible event organisers will accommodate your preferences.</p> <p><u>Online Events:</u> If you choose to share your video feed/audio feed and name when you join the event digitally this information may be captured as part of the recording.</p> <p>If you ask a question during, or at the end of the event, this may be recorded.</p> <p>You can avoid your personal data being recorded by:</p> <ul style="list-style-type: none"> <li>• Turning off your webcam</li> <li>• Turning off your microphone</li> <li>• Writing 'guest' in place of your name when prompted to enter your name</li> </ul>
<p>Purpose 4: Marketing - All</p>	<p>We will seek your consent to send you marketing emails about events offered by UHI, and UHI's Development and Alumni Engagement Department emails. To unsubscribe from the events emails please email: <a href="mailto:events@uhi.ac.uk">events@uhi.ac.uk</a></p> <p>To unsubscribe from UHI's Development Department emails, please use the 'unsubscribe' link in the emails or contact <a href="mailto:development@uhi.ac.uk">development@uhi.ac.uk</a>.</p>
<p>Purpose 5: Reasonable adjustments - All</p>	<p>Collecting data so we can make reasonable adjustments for you to access and enjoy the events.</p>
<p>Purpose 6: Event feedback - All</p>	<p>Contacting you to ask for event feedback. If you do not wish to receive the event feedback survey please email the event organiser at the email address advertised in the university webpage for the event / Eventbrite 'contact the organiser' option.</p>
<p>Purpose 7: Event payment processing - All</p>	<p>Some event tickets are paid for, and your data is processed to make that payment. All payments and donations are processed using the Eventbrite payment function.</p>
<p>Purpose 8: Donation processing and follow up - All</p>	<p>In addition, we offer a donation function that allows you to donate to UHI. If you kindly choose to donate to UHI, then your data will be processed to make that payment. All payments and donations are processed using the Eventbrite payment function.</p> <p>Your information (name, contact information, photo – if available/if we find it online), organisation, position, and the details of your donation) will be used to process your donation and then stored in our relationship management database.</p> <p>We will write to you to thank you for your donation. Sometimes your donation will be added to a particular fund, and we will contact you to inform you of the fund and the good that it does. You can</p>

	opt-out of receiving further communication about your donation by contacting <a href="mailto:development@uhi.ac.uk">development@uhi.ac.uk</a>
Purpose 9: Photography - Physical events	<p>Photographs may be taken of an event including speakers and attendees by the university partnership's elected photographers and press photographers. These crowd shots may include images of event guests.</p> <p>Photographs may be used by the university and its academic partners for marketing purposes including the publication of the images on the institution's website, social media channels, printed publicity material, and any other such marketing and promotion uses.</p> <p><b>Please read the international transfer section for more information about publication of recordings.</b></p>

**Our legal reason for using the data is/are:**

Purpose 1: Event registration and delivery	<p><b>Consent for free events.</b> If you sign up for a free event, then our basis for processing your data is 'consent' as you have consented by booking a ticket.</p> <p><b>Contract for paid events.</b> If you sign up for a paid-for event, then our basis for processing your data is 'contract' as the processing is necessary for the purposes of a contract – that being delivering the event to you.</p>
Purpose 2: Security and health and safety	<p><b>Legal obligation</b> Where the university is required to process personal data for security purposes it will do so as it has a legal obligation to do this, or where the processing is directly requested by the Police.</p> <p>The university may also process personal data where required for health and safety purposes set out in law.</p>
Purpose 3: Recording and publication of events	<p><b>Legitimate interests</b> UHI considers the processing to be necessary for the purposes of its legitimate interests, those being explained further in the 'legitimate interests' section of this privacy notice.</p>
Purpose 4: Marketing	<p><b>Consent</b> If you consent, we will add you to our events marketing email list and send you Development and Alumni Engagement Department marketing emails. We may contact you within three years to check that you want to stay on the mailing list. If you do not reply to say you do, then we will remove you from the list.</p>
Purpose 5: Reasonable adjustments	<p><b>Legal obligation / Public task</b> UHI has a legal obligation under the Equality Act to, so far as possible, make events accessible to all. UHI may need to process data relating to your accessibility needs to make any reasonable adjustments to provide you with access to the event and a good experience.</p>

Purpose 6: Event feedback	<p><b>Legitimate interests</b> UHI considers the processing to be necessary for the purposes of its legitimate interests, those being explained further in the 'legitimate interests' section of this privacy notice. If you do not wish to receive the event feedback survey, please email the event organiser at the email address advertised in the university webpage for the event / Eventbrite 'contact the organiser' option.</p>
Purpose 7: Event payment processing	<p><b>Contract for ticket purchases</b> If you sign up for a paid-for event, then our basis for processing your data is 'contract' as the processing is necessary for the purposes of a contract – that being delivering the event to you.</p> <p><b>Legal obligation</b> In addition to the initial payment processing UHI may be required to keep some of your personal data for accounting and audit purposes as required by relevant laws.</p>
Purpose 8: Donation processing and follow up	<p><b>Consent for donations</b> If you kindly choose to make a donation to UHI, we will process your data to make the payment and record relevant details with your consent (given when you make the donation). We will also write to you to thank you for your donation. Sometimes your donation will be added to a particular fund, and we will contact you to inform you of the fund and the good that it does. You can opt-out of receiving further communication about your donation by contacting <a href="mailto:development@uhi.ac.uk">development@uhi.ac.uk</a></p> <p><b>Legal obligation</b> In addition to the initial payment processing UHI may be required to keep some of your personal data for accounting and audit purposes as required by relevant laws.</p>
Purpose 9: Photography at physical events	<p><b>Legitimate interests</b> UHI considers the processing to be necessary for the purposes of its legitimate interests, those being explained further in the 'legitimate interests' section of this privacy notice.</p>

**The legitimate interest(s) of the controller or third party is/are:**

<p><b>Purpose 3: Recording and publication of events</b> The processing is undertaken under the legitimate interest of: The University of the Highlands and Islands. Summary of legitimate interest: There are a number of benefits to recording events which include:</p> <ul style="list-style-type: none"> <li>• Sharing an event to the wider public that may not be able to attend the event in person</li> <li>• Enabling the university to educate and to disseminate information and research knowledge to the general public and within the university</li> <li>• Raising the profile of the organisation to the general public</li> <li>• Publicising any research being carried out within the university to the wider academic community and to the public</li> <li>• Recording and sharing these events also contributes to a culture of learning and research within the university and engages with students, potential and existing and the public in general</li> </ul>
--

#### Purpose 6: Event feedback

The processing is undertaken under the legitimate interest of: The University of the Highlands and Islands. Summary of legitimate interest: There are a number of benefits to gathering event feedback which include:

Delivering interesting and inspiring events helps the university inform, educate, enhance its worldwide reputation and engage with its wider audience. I

Gathering event attendees views, comments and feedback helps us to:

- widen the range of events
- make events more relevant to the audience
- improves technical issues and access to events
- raises the profile of the university and its departments and research areas to the public
- enhances the registrants' experience

#### Purpose 9: Photography at physical events

The processing is undertaken under the legitimate interest of: The University of the Highlands and Islands. Summary of legitimate interest: There are a number of benefits to taking photographs at which include:

- marking and celebrating an event, for example in the case of an inaugural professorial lecture
- raising the profile of the university and its departments and research areas and to the public
- marketing and encouraging attendance to future university events
- creating materials for teaching students

**The data being used may include special category (sensitive) data if you choose to provide that to us. We may collect your health data or data indicative of your health (dietary requirements or access requirements) to make any reasonable adjustments we can to provide access and to, and improved comfort and experience at our events.**

We may ask for dietary requirements and any access considerations, including technical access, to ensure we can provide the attendee with the best event experience possible.

We may ask you to provide access considerations (and where necessary relevant health data) to make any reasonable adjustments we can to provide access and to, and improved comfort and experience at, our events. You are not obliged to provide this data, but it may help us accommodate you and enhance your experience. We may also collect data about your health if it is pertinent to the health and safety of you or others attending the event.

Our lawful basis for processing your data is that processing is undertaken for a matter of substantial public interest. That interest being that the processing is required under an enactment in the public interest – our legal obligation to make reasonable adjustments to afford access to guests at our events under the Equality Act.

In order to achieve this we may have to share the data you provide with our venue partners or artists/speakers, and only where provision of the data is necessary for the legal aim.

**If you were to withhold the personal information we require for this process, the consequences would be:**

Purpose 1: You would not be able to register for and take part in the event

Purpose 2: If UHI is legally required to collect and process personal data for security or health and safety reasons and you do not provide the required data, UHI may not be able to accommodate you at the event and you may not be able to attend.

Purpose 4: You would not receive marketing information

Purpose 5: We would not be able to make reasonable adjustments

Purpose 7: We would not be able to process your payment, and you would not be able to attend the event

Purpose 8: We would not be able to process your donation

**Your data will, or may, be shared with the following recipients or categories of recipient:**

<p>Purpose 1: Event registration and delivery</p>	<p>The university may use the services of Eventbrite as a data processor to assist us with the registration of individuals for our event.</p> <p>This is a third-party service that is not owned or managed by the University of the Highlands and Islands. If you have registered for a university Eventbrite event your personal data will be processed by Eventbrite on UHI's behalf.</p> <p>This privacy notice refers to the way the University of the Highlands and Islands will process your information (itself and within the Eventbrite system). We recommend that you review Eventbrite's terms and conditions before using the Eventbrite website to book for a UHI event.</p> <p><a href="https://www.eventbrite.co.uk/">https://www.eventbrite.co.uk/</a></p>
<p>Purpose 2: Security and health and safety</p>	<p>If UHI has to make arrangements for VIP security, as required by law, then UHI will share your data with the police or other statutory authority undertaking the security arrangements.</p> <p>Where required for health and safety purposes, you data may be shared with other organisations or individuals, for example; event staff, event venue.</p>
<p>Purpose 3: Recording and</p>	<p>Recordings of events will be published online. The event video may be published, at least, on the YouTube website (UHI's</p>

publication of events	<p>YouTube channel). UHI may publish the recording in other locations online.</p> <p><b>Please read the international transfer section for more information about publication of recordings.</b></p>
Purpose 4: Marketing	Your data will not be shared with any other organisation for this purpose.
Purpose 5: Reasonable adjustments	Your data may be shared with UHI's equality team, the event venue, and relevant members of event staff.
Purpose 6: Event feedback	Your data will not be shared with any other organisation for this purpose.
Purpose 7: Event payment processing	Eventbrite process the payment on UHI's behalf. Details of your payment will be shared with UHI's finance department for their records.
Purpose 8: Donation processing and follow up	<p><b>Eventbrite</b></p> <p>If you kindly choose to donate to UHI, then your data will be processed to make that payment. All payments and donations are processed using the Eventbrite payment function.</p> <p><b>Blackbaud</b></p> <p><b>UHI's Development and Alumni Department</b></p> <p>Your information (name, contact information, photo – if available/if we find it online), organisation, position, and the details of your donation) will be shared with UHI's Development and Alumni Engagement Department be used to process your donation and then stored in UHI's relationship management database. UHI's relationship management database is provided to and maintained for UHI by Blackbaud.</p> <p><b>UHI's Finance Department</b></p> <p>Eventbrite process the payment on UHI's behalf. Details of your payment will be shared with UHI's finance department for their records.</p>
Purpose 9: Photography at physical events	<p>The university and its partner colleges may have an internal or external photographer taking photos at an event on their behalf. The external photographers act on behalf of the institution and will process the images for the institution. Photographs will be held in the university's image library and maybe used on the institution's website, social media channels, printed publicity material, and any other such marketing and promotion uses.</p> <p>Recordings of events will be published online. The event video may be published, at least, on the YouTube website (UHI's</p>

	<p>YouTube channel). UHI may publish the recording in other locations online.</p> <p><b>Please read the international transfer section for more information about publication of recordings.</b></p>
--	--

**Your data will be retained for the following length of time:**

Purpose 1: Event registration and delivery	<p>Your data will be held in the UHI's Eventbrite area for up to four months. UHI will delete your data from the attendee list within four months of the event taking place.</p> <p>Please note that if you have an Eventbrite account, Eventbrite will hold data about you for its own purposes in keeping with their own terms of service for your Eventbrite account.</p>
Purpose 2: Security and Health and safety	<p>UHI will delete this data within one month of the event taking place unless the Police directly requires us to hold it for longer.</p>
Purpose 3: Recording and publication of events	<p>The recording will be kept by UHI until it considers the recording is no longer of promotional, academic, historical, or cultural relevance or benefit. The recording may be archived by UHI at this point or before.</p> <p>Online: UHI will not delete the video from the location(s) to which it posts the videos unless it considers that the recording is no longer of promotional, academic, historical, or cultural relevance or benefit.</p>
Purpose 4: Marketing	<p>Three years from the end of the academic year (July) in which you gave consent for the marketing emails. UHI may contact you near the end of this period to ask if you would like to continue to receive these emails for longer.</p>
Purpose 5: Reasonable adjustments	<p>Your data will be deleted within one month of the event taking place.</p>
Purpose 6: Event feedback	<p>Your data will be held in the UHI's Eventbrite area for up to four months. We will not contact you for event feedback any later than four months after the event.</p>
Purpose 7: Event payment processing	<p>A basic record of your payment will be kept in the finance department's records for audit and compliance purposes for the following period:</p> <p>End of financial year in which the payment is made, plus six years.</p>
Purpose 8: Donation processing and follow up	<p>If you make a donation your information (name, contact information, photo – if available/if we find it online), organisation, position, and the details of your donation) will be passed to UHI's Development and Alumni Engagement Department to process</p>

	<p>your donation and then stored in UHI's relationship management database.</p> <p>Your information will be retained by UHI for the following periods:</p> <p><b>Your data in UHI's relationship management database:</b></p> <p>Five years from your donation or last interaction with UHI, whichever is later.</p> <p>(This period may be extended if you submit a Gift Aid declaration after making the donation and the Gift aid declaration needs to be held for period extending beyond the set deletion date for the record of your donation – see purpose 4).</p> <p><b>Details of your donation being held by UHI's Finance department:</b></p> <p>A basic record of your donation will be kept in the finance department's records for audit and compliance purposes for the following period:</p> <p>End of financial year in which the payment is made, plus six years.</p> <p>(This period may be extended if you submit a Gift Aid declaration after making the donation and the Gift aid declaration needs to be held for period extending beyond the set deletion date for the record of your donation – see purpose 4).</p> <p><b>Details of your donation in Eventbrite:</b></p> <p>Details of your donation will also be stored on Eventbrite (who process the payment) for 4 months and then deleted.</p>
<p>Purpose 9: Photography at physical events</p>	<p>Visual images may be held and processed in both printed and electronic format and will be used for no longer than five years from the date they are taken and deleted from the university image library.</p>

**This process involves your data being sent outside of the UK or is subject to a restricted transfer (transfer outside the control of the UK UK GDPR/GDPR). The following safeguard is in place for this restricted transfer:**

<p>Purpose 1: Event registration and delivery</p>
<p>1) When we process your registration for events (and any payments) we do this using Eventbrite, who process data on our behalf. Eventbrite is an international organisation, and it may process your data outwith the UK and EEA.</p> <p>This process involves your data being sent outside of the UK or is subject to a restricted transfer (transfer outside the control of the UK UK GDPR/GDPR). The international transfer</p>

takes place on the following basis: The transfer is made subject to EU Standard Contractual Clauses with Eventbrite.

#### Purpose 4: Marketing

#### Purpose 8: Donation processing and follow up

2) If you consent to marketing or if you make a donation then we will add you to our relationship management database. The database vendor (Raiser's Edge) store your data on our behalf. Our database vendor (Raiser's Edge) is an international organisation, and it may process your data out with the UK and EEA.

This process involves your data being sent outside of the UK or is subject to a restricted transfer (transfer outside the control of the UK UK GDPR/GDPR). The international transfer takes place on the following basis: The transfer is made to the US subject to Standard Contractual Clauses with Raiser's Edge.

#### Purpose 3: Recording and publication of events

#### Purpose 9: Photography at physical events

The UK GDPR/GDPR restricts the transfer of personal data to countries outside the European Economic Area, or international organisations. This restriction is in place because once data is transferred in this way it will not be subject to the UK GDPR/GDPR and you will lose the ordinary protections (protections and rights) for your data once it has been transferred. Once the data has been transferred it may be subject to other local data protection laws in the receiving country – or no data protection law at all if no such law exists in the receiving country. It is, therefore, very important for you to informed that your data will be transferred in this way and important that you read and understand the information provided to make sure you are making a fully informed choice when deciding whether or not to consent to the proposed international data transfer.

International data transfer - the proposed international transfer.

UHI plans to record its event and publish this online, where it will be accessible to anyone in the world. If, during the event, you turn on your microphone to speak, or turn on your video or enter your name when you enter the meeting, this video/audio/text data may be recorded as part of the recording and may be shared as part of the video.

The ICO explains that putting personal data on to a website will often result in a restricted transfer. The restricted transfer takes place when someone outside the EEA accesses that personal data via the website.

The data will be made available on a public-facing website meaning any individual, in any country or territory in the world, will be able to access the data. This means that you and UHI will not know who has accessed your data on the website.

Why UHI is planning to make the transfer? The purpose of the international transfer is:

UHI considers that there are a number of benefits to recording events which include:

- Sharing an event to the wider public that may not be able to attend the event in person

- Enabling the university to educate and to disseminate information and research knowledge to the general public and within the university
- Raising the profile of the organisation to the general public
- Publicising any research being carried out within the university to the wider academic community and to the public
- Recording and sharing these events also contributes to a culture of learning and research within the university and engages with students, potential and existing and the public in general

Your right to withdraw consent and how this may be limited once your data has been transferred.

The transfer will only take place with your explicit consent. UHI has made it clear in this privacy notice not to enter the event with your name entered, microphone on or video feed on. UHI considers that entering this information or entering the event with your microphone on or video on to be you giving, in these circumstances, your explicit consent to the recording of this information and its publication.

You have the right to withdraw your consent at any time, and UHI will attempt, so far as is possible, to redact your data from its published recording. To withdraw your consent please email [events@uhi.ac.uk](mailto:events@uhi.ac.uk).

Please note that if your data has been accessed by parties in third countries not covered by the UK GDPR/GDPR you may not be able to exercise the same rights associated with consent under the UK GDPR/GDPR against those third parties – including withdrawing consent for processing.

The possible risks involved in making a transfer to a country which does not provide adequate protection for personal data:

The UK GDPR/GDPR restricts the transfer of personal data to countries outside the EEA, or international organisations. This restriction is in place because once data is transferred in this way it will not be subject to the UK GDPR/GDPR and you will lose the ordinary UK GDPR/GDPR protections (protections and rights) for your data once it has been transferred. Once the data has been transferred it may be subject to other local data protection laws in the receiving country – or no data protection law at all if no such law exists in the receiving country.

There is a risk with international transfers of this type that you will lose control of your data if it is accessed by a party to whom the UK GDPR/GDPR does not apply. This is because you will not be able to exercise your ordinary UK GDPR/GDPR rights against that party, there may be no supervisory authority to appeal to, and there may be no other local data protection or privacy law on which you can rely to exercise any control over your data held by the third party. You may not be able to control who uses your data, for what purpose, with whom they share it, limit any use of the data, and you may not be informed at all that third parties are using your data.

Your data may be accessed by third countries in countries with no data protection laws and these parties may use your data in a way that would be unlawful under the UK GDPR/GDPR, but which are lawful in their own country. In such circumstances you would likely have limited, or no, ability to stop or influence that processing.

There are risks involved with international transfers and you should only consent if you have read and understand the above and still wish to proceed.

Limits on rights due international transfers:

Your ability to exercise your rights once an international transfer has taken place may be limited. If your data is transferred to a country without the UK GDPR/GDPR or other similar laws and protections you may not be able exercise these, or any other, data protection rights in respect of the transferred data. Your rights under the UK GDPR/GDPR are listed in the next section.

**The following rights are rights of data subjects:**

- The right to access your personal data
- The right to rectification if the personal data we hold about you is incorrect
- The right to restrict processing of your personal data

The following rights apply only in certain circumstances:

- The right to withdraw consent at any time if consent is our lawful basis for processing your data
- The right to object to our processing of your personal data. If you do not wish to receive the event feedback survey please email the event organiser at the email address advertised in the university webpage for the event / Eventbrite 'contact the organiser' option.
- The right to request erasure (deletion) of your personal data
- The right to data portability

You also have the right to lodge a complaint with the Information Commissioner's Office about our handling of your data.