Privacy Notice – Text messaging students

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.

For any queries or concerns about how your personal data is being processed you can contact the relevant Data Protection Officer at <u>dataprotectionofficer@uhi.ac.uk</u>

This privacy statement relates to the following process:

Sending text messages to students

UHI and the <u>UHI Academic Partners</u> (UHI colleges) may wish to send you text messages from time to time to keep you up to date.

Purpose	Description of purpose
Purpose 1: Emergency communications	Send emergency communications to staff, students, and stakeholders. These messages will be sent when there is a health and safety or other emergency issue that requires UHI or Academic Partners to contact individuals to protect them or others.
Purpose 2: General student reminders	 Send out general student reminders about matters such as: Send graduands reminders to: 1) respond to graduation invitation 2) Remind graduands of their graduation ceremony date and time 3) remind graduands to book gowns etc.: Remind students of graduation details and further activity required.
Purpose 3: Student attendance notifications and management texts	 Send and receive text messages to/from you regarding your attendance at college, such as: Receive non-attendance notification from students and confirmation or receipt reply from college: Confirmation of receipt may include instructions for students on next steps. Non-attendance: Send a text message to students informing them that they missed a lecture and providing information on next steps (get in touch with student PAT).
Purpose 4: Funding reminders and information	 Send you reminders and updates about student finance, such as: Bursaries: Remind students to complete bursary applications or supply evidence in support of bursary applications. ESF funding: text students on ESF-funded courses to ask them for evidence in support of the course ESF funding

Your information will be used for the following purposes:

Purpose 5: Service updates and routine contractual matters	 Sending you text messages with important service updates, such as: Building or facilities closure notifications Service updates – including details of changes or updates to important services offered as part of the student contract. Send notification of overdue library materials or updates on any reservations you have.
Purpose 6: Important contractual matters and financial recovery	Sending you text messages about Important contractual matters and financial recovery. This includes sending you information about substantial matters concerning your student contract that require action or potential, or actual, financial recovery (recovering money that you owe; for example, for non-return of a library book).
Purpose 7: Manage the Admissions process	Sending you text messages to make a conditional or unconditional offer of a study place. Processing applicant responses confirming or rejecting the offer of a study place. Sending out links to applicants providing information on the Admissions, Applications, Enrolment and/or Induction processes.

Our legal reasons for using the data are:		
Purpose 1:	Legal obligation – The processing is necessary for the purpose of a	
Emergency	legal obligation – that being an obligation under the Health and	
communications	Safety Act 1974, or any other law that, in the particular	
	circumstances, requires effective communication with individuals that	
	would be achieved via text message.	
Purpose 2:	The processing is necessary for the purposes of legitimate interests	
Student reminders	pursued by UHI and/or its academic partners to communicate	
	effectively with students and stakeholders.	
	Use is necessary for the performance of a contract with you or to take steps, at your request, before entering into such a contract. That being your student contract.	
Purpose 3:	The processing is necessary for the purposes of legitimate interests	
Student attendance	pursued by UHI and/or its academic partners to communicate	
notifications and	effectively with students and stakeholders.	
management texts		
Purpose 4: Funding	The processing is necessary for the purposes of legitimate interests	
reminders and	pursued by UHI and/or its academic partners to communicate	
information	effectively with students and stakeholders.	
Purpose 5:	Use is necessary for the performance of a contract with you or to	
Service updates and	take steps, at your request, before entering into such a contract.	
contractual matters	That being your student contract.	
Purpose 6: Important	Use is necessary for the performance of a contract with you or to	
contractual matters	take steps, at your request, before entering into such a contract. That being your student contract.	
and financial recovery	That being your student contract.	
	The processing is necessary for a legal obligation: Where the	
	university is undertaking financial recovery action it may have legal	
	obligations in respect of how it processes financial data and/or how it	
	contacts you.	
Purpose 7:	Use is necessary for the performance of a contract with you or to	
Manage the	take steps, at your request, before entering into such a contract.	
Admissions process	That being your student contract.	

The legitimate interests of the controller or third party are:

The processing is undertaken under the legitimate interest of: The University of the Highlands and Islands and its academic partners. That legitimate interest being:

UHI considers that the use of text messages to keep students up to date will enhance student communication and engagement leading to a better student experience and outcomes. This benefit is in keeping with UHI's Strategic Plan and Vision to enhance student engagement and communication.

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

You would not receive the updates and reminders listed in the purposes section.

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

PageOne text messaging system

PageOne is the system that UHI uses to send and receive text messages. PageOne do not use your phone number for their own purposes, UHI uses the system to send and receive text messages. PageOne will not share or sell on your data.

UHI and UHI's Academic Partners

Your data may be shared with UHI or <u>UHI's Academic Partners</u> to allow them to communicate with you regarding estate or services they manage that you may interact with. They may also contact you regarding any matters concerning you student contract in which they are involved.

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

Your mobile phone number will be kept as part of your student record for the following length of time:

Non-ESF funded students: End of student relationship plus seven years

ESF funded students: 31/12/2030 (unless your student relationship finishes within seven years of 2030, in which case it will be held for seven years after your student relationship ends).

You are able to edit, or remove, your mobile phone number using UHI Records (or contact your local Registry team).

Please note that your details may be kept as part of your student record for longer than the time period above if you have outstanding items on loan from the University or an Academic Partner (eg library), or owe money to the university or your college, and the university or your college is in the process of recovering these items or amounts.

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.
- 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 <u>Information Commissioner's Office (ICO)</u>