

WARWICK CONFERENCES PRIVACY NOTICE

Welcome to Warwick Conferences (a trading style of Warwick University Training Limited and the University of Warwick). Our contact details are as follows:

Rootes Building, The University of Warwick, Gibbet Hill Road, Coventry, CV4 7AL

The Warwick Conferences website is operated by the University of Warwick. We take data protection seriously and are committed to protecting your personal data and are transparent about information Warwick Conferences holds about you.

1. ABOUT THIS NOTICE

The purpose of this privacy notice is to inform you how we use and look after your personal data and also inform you of your privacy rights.

We ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event that you have a query or complaint.

Warwick Conferences is the trading style of Warwick University Training Ltd and the University of Warwick. They are a core business of The University of Warwick ("UoW") and support the University's objectives through the fulfilment of conference, meeting and event services that generate revenue that is then reinvested to support the University. The purpose of this notice is to promote transparency in the use of personal data, and to outline how we collect and use personal data during and after your relationship with us, in accordance with the <u>General Data Protection Regulation 2016 ("GDPR")</u> and the Data Protection Act 2018 ("DPA 2018").

The University of Warwick and Warwick University Training Ltd are the data controller under the GDPR and DPA 2018 and we will process your personal data in accordance with the GDPR and DPA 2018 at all times. You, as a 'data subject', therefore have specific rights to the data that we hold, collect and process.

Throughout this notice, "Warwick Conferences", "Warwick University Training Limited", "we", "our", and "us" refer to Warwick Conferences; "you" and "your" refer to those customers and delegates making use of the services provided by Warwick Conferences.

If you would like this notice in another format (for example: audio, large print, braille), please contact us (see 'How to contact us' above).

Third Party Links

Usage of Warwick Conferences website will include links to third-party websites such as Twitter, Facebook, YouTube, LinkedIn, Instagram and other cultural websites, plug-ins and applications. Clicking onto those links or enabling those connections may allow third parties to collect or share data about you. As these sites are not controlled by Warwick Conferences, we will not be responsible for their privacy notice or their terms of usage. When you are no longer on our website we encourage you to read their privacy policies and terms of usage of every website you visit before committing to sharing your personal data.

2. THE PERSONAL DATA WE COLLECT AND USE

The following are examples of personal data which may be collected, stored and used:

Personal contact details such as name, age (where it applies to under 18s), title, address, contact telephone number(s), email address, marital status, gender.

Your preferences in relation to room type and specific requests from you to allow us to facilitate an event and/or stay.

Links to social media accounts.

Your occupation and professional memberships.

Records of communications sent to you and received from you. Your

vehicle registration details.

Photography & Video images of you - We may record an event(s) by using photography and video footage at your request or on behalf of a third party (for example an organiser) who has entered into an agreement to make a booking with us).

CCTV footage – Warwick Conference has CCTV cameras throughout its buildings for security purposes. Access to these is limited to specific members of staff and will be accessed by adhering to strict guidelines on security issues.

Dietary requirements, disabled access. Payment

card information.

3. SPECIAL CATEGORY DATA

Special Category personal data is any identifying information including but not limited to the following; racial or ethnic origin, political opinions, religious or philosophical beliefs, data concerning health or data concerning a natural person's sex life or sexual orientation.

We may only process your special category personal data in the following circumstances where, in addition to a lawful basis for processing, there exists one of the following grounds:

Explicit consent – where you have given us explicit consent.

Vital interests - The processing is necessary in order to protect the vital interests of the individual or of another natural person where the data subject is physically or legally incapable of giving consent. This is typically limited to processing needed for medical emergencies.

Public information - The processing relates to personal data which is manifestly made public by the data subject.

Legal claims - The processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

We will only use your personal data for the purposes for which it was collected unless it is considered reasonably that it is needed for another purpose and the reason is compatible with the original purpose. If Warwick Conferences needs to use your personal data for an unrelated purpose, it will notify you and will explain the legal basis that permits it to do so. Warwick Conferences may process your personal data without your knowledge or consent, in compliance with this policy and procedure, where this is permitted by law.

In limited circumstances, we may contact you for your written consent to the processing of particularly sensitive data. In such circumstances, we will provide you with full details of the information needed and the reason it is needed, so that you can consider whether you wish to give your consent.

Where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Individuals need to write to infocompliance@warwick.ac.uk to withdraw their consent. Once we have been notified that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. If the latter is the case, we will inform you of this legitimate basis.

We may collect, store and use the following types of special category personal data:

Information about your health, including any medical condition, dietary needs and disability information.

How we may use this information:

The information we collect from you will primarily be used to fulfil your reservation or event, whether it is part of an individual booking or a group booking.

We may contact you or your organiser prior to your stay or an event to deal with pre-stay and/or event related matters:

We may provide your room details to the organiser of an event on the basis that there is a legitimate interest to do so (such as a third party company or your employer). You do have the right to object to this and if you do so you must notify us immediately;

After your stay and/or event, we may also send you or your organiser post-stay communications relating to your stay, event or marketing activity.

3. HOW WARWICK CONFERENCES OBTAINS YOUR PERSONAL DATA

Your personal data is obtained from the following sources:

- The online booking tools
- Booking agents; online booking agents; companies booking direct with Warwick Conferences.
- Directly from you where you make a booking e.g. telephone, face to face, website, email reservations and social media platforms such as LinkedIn and Twitter.
- Through third party bookers and agencies.
- Third party portals.
- Bought in data where you have given consent for its use.
- Exhibitions and industry events.
- Financial information which includes payment details using credit/debit card details.
- Technical and personal information on your device needed to access the Warwick Conferences website.
- Profile details includes your email address and password and all information that you
 add when creating your profile and any content that you create while using Warwick
 Conferences Website.
- Wi-Fi registration details.
- When you register your vehicle details for the purposes of car parking.
- Usage Data includes information about how you use the Warwick Conferences website. For example location data, the resources you access and other sites you have visited.
- Preference details includes your preferences in receiving communications from us.

4. LAWFUL BASES FOR PROCESSING YOUR PERSONAL DATA UNDER THE GDPR AND DPA 2018

Purpose and associated lawful basis

Your personal data will be processed by Warwick Conferences for the purposes detailed below;

Lawful basis for processing your personal data under the GDPR and DPA 2018

Personal data will only be processed when the law permits this to happen. Most commonly personal data will be processed in the following circumstances:

- Where you have given consent
- Where Warwick Conferences needs to comply with a legal obligation (for example the detection or prevention of crime and financial regulations)
- Where it is necessary for Warwick Conferences legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- To protect the vital interests of the data subject or of another person (for example, in the case of a medical emergency)

Details of how the University of Warwick and Warwick Conferences apply these can be found below.

Data subject rights

Under the GDPR and DPA 2018 you have a number of important rights free of charge. You have the right to:

- Be informed of how we collect and use your personal data;
- Access your personal data;
- Require us to correct any mistakes in the data we hold on you;
- Require the erasure of personal data concerning you in certain situations;
- Restrict our processing of your personal data in certain circumstances;
- Receive your personal data, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- Object in certain situations to our continued processing of your personal data or at any time to processing of your personal data for direct marketing; and
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.

To exercise any of these rights please find out more <u>here</u>. If a subject access request is made and the request for access is clearly unfounded or excessive, the University reserves the right to refuse to comply with the request in these circumstances.

Keeping your personal data secure

We keep your personal data secure at all times using both physical and technical measures. Where appropriate, we also take measures such as anonymisation to ensure data cannot be used to identify you and/or encryption to ensure that the data cannot be accessed without the right security accesses and codes.

Where we engage a third party to process personal data it will do so on the basis of a written contract which conforms to the security requirement of the GDPR and DPA 2018. We take measures to enable data to be restored and accessed in a timely manner in the event of a physical or technical incident.

We also ensure that we have appropriate processes in place to test the effectiveness of our security measures.

5. PURPOSE AND ASSOCIATED LAWFUL BASIS

Purpose	Lawful
To process and facilitate your reservation at Warwick Conferences. Where payment is made by direct debit/credit card, your information may be collected by third party service providers such as credit/debit card companies to authenticate payment.	Necessary for the performance of a contract
Effectively process and manage customer enquiries.	Performance of a contract
To provide contracted services to clients.	Performance of a contract
To prevent fraud and comply with anti-money laundering legislation.	Compliance with a legal obligation
Notifying you of any changes to our terms and conditions or privacy notice.	Necessary for the performance of a Performance of a contract.
Managing our relationship with you in relation to sales activity. (For example annual account review, rate negotiations, contract reviews)	Legitimate Interest
Video, film and photographic image(s) of the recording of an event	Legitimate interest and/or consent
Complying with health and safety legislation.	Compliance with a legal obligation
Business to business marketing.	Consent obtained through third party for bought-in data or legitimate interest
Business to consumer marketing.	Consent
Providing client car parking.	Performance of a contract
Provide your room details to a third party who is in control of organising a reservation/booking and requires your room details so as to be able to deliver the event.	Legitimate interest/performance of a contract

Consideration for individuals and their property	Legitimate interest
and the protection of Warwick Conferences'	
assets including the use of CCTV throughout	
internal and external buildings within the remit	
of Warwick Conferences.	

6. DATA SHARING

We may share your personal data with third parties where required by law, where it is necessary for the performance of our contract with you or where there is another legitimate interest in so doing. Third parties with whom we may share your data include:

Third parties within the EEA	Lawful basis
Booking agents	Performance of a contract
Data analytics specialists	Legitimate interest
Direct business bookers	Performance of a contract
Third parties services such as dry cleaners, taxis, coach companies, teambuilding organisers etc.	Performance of a contract
IT providers	Performance of a contract.
Health & Safety Executive	Legal Obligation
National Health Service	Vital Interest
Public Liability Insurers	Legal obligation
Nominated Emergency Contact	Vital Interest
Payment Company – for the purpose of processing payment(s) with Global Payments	Legitimate interest

Transfers of data outside of the EEA

We may transfer the personal data we collect about you to countries outside the EEA so long as there is a lawful basis for doing so or we have your consent. In certain circumstances we may seek your explicit consent to send your personal data outside of the EEA. When doing so we will inform you in clear terms of the data protection framework in place in the relevant countries in order to enable you to make an informed decision.

Before sending your personal data to countries outside of the EEA data we will ensure that adequate data protection provisions are in place, the processor has provided appropriate safeguards to ensure enforceable rights and legal remedies or other specified conditions are met under data protection law.

7. RETENTION OF YOUR PERSONAL DATA

The GDPR and DPA 2018 require that personal data should be kept for no longer than is necessary for the purposes for which the personal data are processed (except in certain specific and limited instances).

<u>The University's Record Retention Schedule</u> (RRS) is a tool that us to transparently demonstrate how the organisation complies with its data protection obligations by making provision for the time periods for which common classes of record are retained by Warwick Conferences.

Full details of the retention periods of records can be found by viewing the <u>records</u> <u>management page</u> and selecting the University's Record Retention Schedule (RRS), which is kept up to date separately.

8. YOUR RIGHTS AS A DATA SUBJECT

Under the GDPR and DPA 2018 you have a number of important rights free of charge. You have the right to:

- Fair processing of data and transparency over how we use your use personal data
- Access to your personal data and to certain other supplementary information that this Privacy Notice is already designed to address
- Require us to correct any mistakes in the data we hold on you
- Require the erasure of personal data concerning you in certain situations
- Receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- Object at any time to processing of personal data concerning you for direct marketing
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- Object in certain other situations to our continued processing of your personal data
- Otherwise restrict our processing of your personal data in certain circumstances
- Claim compensation for damages caused by our breach of any data protection laws

You can request to be removed from future publications and digital content at any time, but you cannot be removed from materials which have already been published. To exercise any of these rights, an individual needs to send an email to **infocompliance@warwick.ac.uk**. No fee will be charged although the University reserves the right to charge a fee if a data subject access request is made or the request for access is clearly unfounded or excessive, or to refuse to comply with the request in these circumstances.

9. KEEPING YOUR PERSONAL DATA SECURE

We keep your personal data secure at all times using both physical and technical measures. Where appropriate, we also take measures such as anonymisation to ensure data cannot be used to identify you and/or encryption to ensure that the data cannot be accessed without the right security accesses and codes.

Where we engage a third party to process personal data it will do so on the basis of a written contract which conforms to the security requirement of the GDPR and DPA 2018. We take measures to enable data to be restored and accessed in a timely manner in the event of a physical or technical incident.

We also ensure that we have appropriate processes in place to test the effectiveness of our security measures.

10. HOW TO CONTACT US

We hope that our Data Protection Officer (DPO) can resolve any query, concern or complaint you raise about our use of your personal data on the contact details below:

The DPO can be contacted via e-mail at dpo@warwick.ac.uk

Or write to:

The Data Protection Officer
Information and Data Compliance Team
University of Warwick
University House
Kirby Corner Road
CV4 8UW

The GDPR and DPA 2018 also gives you the right to lodge a complaint with the Information Commissioner who may be contacted at https://ico.org.uk/concerns/ or telephone: [0303 123 1113].

11. CHANGES TO THIS PRIVACY NOTICE

This privacy notice was published on 3rd April 2020 and may be updated from time to time.