

Advance HE Privacy Notice General Surveys

Introduction

This Privacy Notice ("Notice") explains how Advance HE collects, uses, stores, and protects personal data relating to individuals who are undertaking an survey directly with Advance HE. The purpose of this Notice is to inform individuals (known as "data subjects") about:

- The personal data that Advance HE collects from or about them
- Why and how that personal data is used
- How Advance HE protects and manages personal data
- The circumstances in which personal data may be shared; and,
- The rights individuals have regarding their personal data.

Advance HE is committed to processing personal data lawfully, fairly and transparently. This Notice is provided in accordance with the UK General Data Protection Regulation (UK GDPR) and other applicable UK data protection legislation (collectively known as "Data Protection Legislation"), which require organisations to inform individuals about how their personal data is processed.

Advance HE

For the purposes of the Data Protection Legislation, Advance HE is the Data Controller of the personal data processed through the survey. Advance HE is responsible for determining how and why your personal data is collected, used, stored and otherwise processed.

Advance HE is a company limited by guarantee, incorporated in England and Wales under company number 04931031. It is a registered charity in England and Wales under charity number 1101607 and in Scotland under charity number SC043946. Our registered office is:

Advance HE
Innovation Way
York Science Park
York
YO10 5BR

Advance HE is registered with the Information Commissioner's Office (ICO) under registration number Z8550188.

As Data Controller, we are committed to processing personal data lawfully, fairly and transparently, and to ensuring that appropriate technical and organisational measures are in place to protect the personal information we hold.

Type of Personal Data We Will Collect

Advance HE may collect and process the following personal data:

- Identifiers (first name and last name)
- Email address
- Institution name, role, department/ discipline
- Free text analysis
- Demographic information
- Age

Special Category Data and Criminal Offence Data

Where necessary and appropriate, Advance HE may also collect and process the following categories of special category personal data and criminal offence data:

- Race
- Ethnic Origin
- Politics
- Religion
- Health
- Sex life or orientation

How We Collect the Personal Data

Advance HE collects personal data both directly from individuals and indirectly from other sources.

Information Collected Directly

We collect personal data directly from you through:

- The individuals registering onto a service offered by Advance HE.
- Surveys produced by Advance HE made available to students, staff, and members of the public globally.

Information Collected Indirectly

We may also collect personal data about you from third parties, including:

- Institutions engaging Advance HE's survey-based services. The information on staff or students may be provided directly by the institution or collected directly by Advance HE in liaison with the institution.
- Third party organisations, including Government, Public representative groups or membership organisations engaging with Advance HE's survey-based services.
- Commercial organisations engaged by Advance HE to provide survey-based services.

Why We Collect and Use Personal Data

Advance HE collects and processes personal data for the following purposes:

- Evaluating and analysing information provided by the individuals in the survey.
- Generating reports for internal use by Advance HE in relation to the survey responses.
- Generating reports for external use by authorised third parties in relation to the survey responses (personal data will be anonymised).
- Generating reports (using either anonymised or identifiable data – as specified in each survey) for members and clients, including (but not limited to) individual education institutions, membership organisations, Governmental organisations, in order to provide them with feedback and analysis based on the survey responses.
- Use direct quotes from feedback surveys to support promotion of courses and services, or to facilitate a better understanding of the experience of individuals in the survey .
- Where appropriate, to communicate with the individual on their responses in order to resolve any queries or complaints identified in the survey responses.

Lawful Basis

Advance HE will only collect and use personal data where there is a lawful basis for doing so under Data Protection Legislation. Depending on the purpose of the processing, Advance HE relies on the following lawful bases:

- **Consent** – Individuals will be requested to give their consent prior to completing their survey responses.
- **Contract** – Advance HE is appointed via contracts with institutions / individuals in order to carry out surveys on their behalf.

Data Sharing

Advance HE works with trusted third-party service providers to support the delivery of our services and the operation of our business. In certain circumstances, it is necessary for us to share personal data with these providers to enable them to perform services on our behalf. These include:

- **Third party subcontractors** who support Advance HE in the analysis of the survey data and the production of the reports.
- **Institutions and client organisations** where survey feedback is shared with organisations who are contracted as part of contractual arrangements and improvements of the sector.
- **Third party organisations** who support the publication of anonymised data and reports.
- **Service providers and suppliers** who support Advance HE's operations, including IT service providers, cloud-hosting providers, payment processors, communication platforms and administrative support services. A detailed list can be found [here](#).
- **Professional advisers**, including legal, financial, audit and insurance advisers where necessary to obtain professional services or comply with legal obligations.

- **Regulators, government bodies, law enforcement agencies and courts** where disclosure is required by law, regulation or legal process.

Where we share personal data with third parties, Advance HE ensures that appropriate contractual and organisational safeguards are implemented to protect personal data and to ensure that it is processed only in accordance with our instructions and applicable data protection legislation.

Our service providers are not permitted to use personal data for their own purposes and may only process personal data on behalf of Advance HE and in accordance with our instructions. Advance HE does not sell personal data to third parties.

International Transfers

Advance HE may transfer personal data to organisations located outside the UK where this is necessary for the delivery of our services or where we use suppliers that process data internationally.

Whenever personal data is transferred outside the UK, Advance HE will ensure that appropriate safeguards are in place to protect the information and to ensure that it receives an equivalent level of protection to that provided under Data Protection Legislations.

These safeguards may include:

- Transferring personal data to countries that have been recognised as providing an adequate level of protection for personal data.
- Using the UK International Data Transfer Agreement (IDTA) or other approved contractual safeguards.
- Relying on another lawful transfer mechanism permitted under applicable data protection legislation.

Further information about international data transfers and the safeguards we apply is available on request.

Retention of Personal Data

Advance HE will retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including to satisfy legal, regulatory, accounting and reporting requirements. Further details can be found within our [Retention & Erasure Policy](#).

When determining appropriate retention periods, we consider the nature and sensitivity of the personal data, the purposes for which it is processed, the potential risks associated with its use, and any applicable legal or regulatory requirements.

In some circumstances, Advance HE may anonymise personal data so that it can no longer be linked to an individual. Where data has been anonymised, it may be used for statistical, research and reporting purposes without further notice.

Personal Data Rights

Under Data Protection Legislation, individuals have rights in relation to their personal data, these rights may apply in certain circumstances and include:

- **Access** – to request a copy of the personal data we hold about you.

- **Rectification** – to request that inaccurate or incomplete personal data is corrected.
- **Erasure** – to request the deletion of your personal data in certain circumstances.
- **Restrict processing** – to request that we limit the way we use your personal data in certain circumstances.
- **Object** – to object to the processing of your personal data in certain circumstances.
- **Data portability** – to receive certain personal data in a structured, commonly used and machine-readable format, or to have it transferred to another organisation where technically feasible.

Where Advance HE relies on consent as the lawful basis for processing personal data, you also have the right to withdraw your consent at any time. Withdrawal of consent will not affect the lawfulness of any processing carried out before consent was withdrawn.

To exercise any of your rights, please contact us at data.protection@advance-he.ac.uk. Further information can be found in our [Data Subject Request Policy](#).

Right to Complain

If you have concerns about how Advance HE processes your personal data, we encourage you to contact us via the contact details below in the first instance so that resolve the issue.

You also have the right to lodge a complaint with the Information Commissioner the UK's independent regulator for data protection matters when you feel your complaint has not been handled appropriately by Advance HE.

Information Commissioner

Website: www.ico.org.uk

Telephone: 0303 123 1113

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Advance HE Contact Details

Field	General Contact	Data Protection Officer
Name:	Jonathan Neves	Becky Tasker
Email:	surveys@advance-he.ac.uk	Data.protection@advance-he.ac.uk