



Privacy Notice for HEFESTIS Ltd Members Staff & Other Stakeholders Across the Scottish HE/FE Network

Who Are We?

HEFESTIS (Higher Education/ Further Education Technology and Information Services) Limited is a not-for-profit Shared Service organisation jointly owned by member institutions across the Scottish University and Colleges sectors. It provides shared services to institutions and where applicable to sector owned bodies. We are wholly owned by our member HE and FE institutions and therefore act as a subsidiary for them. Our contact details are: HEFESTIS Ltd Unit 27, Stirling Business Centre, Wellgreen, Stirling, FK8 2DZ Tel: +44 (0) 131 442 8930.

The processing of personal data is governed by the UK General Data Protection Regulation (UK GDPR) and UK Data Protection Act 2018. HEFESTIS Ltd is a Data Controller, which means we are responsible for deciding how we hold and use your personal data. HEFESTIS Ltd is committed to protecting your privacy and complying with data protection law.

What is Personal Information?

'Personal information' means information about individuals, and any information from which they can be identified, either by reference to an identifier (for example names, location data or online identifier (IP address)) or from factors specific to your physical, cultural or social identity. This document has been created to be read by individuals to understand how their personal data is used within the context of this notice so references to "you" throughout should be read as being the individuals concerned.

Scope

This privacy notice provides you with information about us, how and why we collect personal information from you, what we do with the personal information we collect from you, who we share your personal information with and your rights in relation to that information. We review our Privacy Notice's regularly and will publish any updates on our website.

How Do We Collect Your Personal Information?

HEFESTIS Ltd complies with its obligations under UK GDPR and relevant data protection legislation by keeping personal data up-to-date; by storing and destroying it securely; by only collecting and holding the minimum data needed to provide our services to you; by protecting personal data from

loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

Where Does Your Personal Information Come From?

We collect your personal information, for example when you:

- contact us via telephone, email or by post;
- access our shared services;
- register your interest in meetings, training or events;
- agree to take part in collaborative working groups;
- receive your personal data from third parties, for example, employers (the HE or FE organisation you work for), sectoral professional groups, national strategic bodies and government organisations operating across the sector, or other FE or HE organisations.

If you would like more information on the source of your personal information, please contact us using the details at the end of this document.

What Types of Personal Information Do We Collect?

The details of the personal information we may collect, in addition to the reasons and lawful basis for processing, are shown in Table 1.

How Do We Share Your Personal Information?

We may share your personal information with the following parties:

- With our employees and/or professional advisors;
- HEFESTIS Ltd member institutions;
- With third-party providers under contract (acting as a Data Processor under our instruction), specifically APUC Ltd who provide our HR, Finance and IT services including our website;
- The Information Commissioner's Office;
- To prevent fraud and other criminal offences or because of a Court Order, for example HMRC, the police.

What is the Lawful Basis for Processing your Personal Data

HEFESTIS Ltd will process data in order to fulfil its wide-ranging obligations for delivery of its core purpose for its member institutions and services. Depending on the activity your data is used for, we will rely on one or more of the following conditions for processing:

- a legitimate interest;
- performance of a contract.

How Long Will We Keep Your Personal Data?

We keep your personal information only for as long as is necessary for the purposes for which we process your personal information in-line with our retention schedule. These purposes are listed in Table 1.

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including to satisfy any legal, accounting or reporting requirements.

We will retain your personal information for the time that you remain a member of HEFESTIS Ltd or until you notify us that you or one of your staff members has left the organisation.

What Are Your Rights Regarding Your Personal Data?

Under data protection law, you have a number of rights in relation to your information, including:

- your right to be informed of how your data is being processed, (as in this privacy notice);
- your right to access and obtain a copy of your data on request, often referred to as a subject access request;
- your right to ask an organisation to change incorrect or incomplete data;
- your right to ask an organisation to delete or stop processing your data under certain circumstances;
- your right to object to the processing of your data under certain circumstances;
- your right to data portability and in relation to automated decision making and profiling.

Further details about your privacy rights can be found on the Information Commissioner's Office website [here](#).

How Will We Keep Your Data Safe?

We will ensure that we have in place appropriate technical and organisational measures to prevent unauthorised or unlawful processing of personal data and against accidental loss or destruction of your personal information.

These security measures include:

- hard copy records and manual files are kept to a minimum, where required these will be kept in locked filing cabinets;
- electronic records are kept in an electronic filing system with access restricted to HEFESTIS Ltd staff on a need-to-know basis;
- appropriate cyber security measures, including accreditation to relevant cyber security standards.

When we use third party organisations to process information on our behalf, we ensure they are compliant with UK GDPR & relevant data protection legislation as outlined in our contract(s) with them, where they will only process information on our written instruction.

Further Information

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, please contact: Dr Mairead Wood, HEFESTIS Ltd Unit 27, Stirling Business Centre, Wellgreen, Stirling FK8 2DZ. E-mail: mwood@hefestis.ac.uk

We aim to resolve all complaints internally via our Data Protection Officer, but you do have the right to lodge a complaint with the Information Commissioner's Office using their website <https://ico.org.uk/make-a-complaint> or by phone on 0303-123-1113. Alternatively, you can email casework@ico.org.uk or write to them: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Table 1: Personal Information, Reason and Lawful Basis for Processing

| Reason for processing your personal information | Legal basis for processing, and legitimate interest (where applicable) | Your personal information |
|--|---|---|
| <ul style="list-style-type: none"> To communicate with you and to facilitate communication between you and other people | <ul style="list-style-type: none"> To enter or carry out the contract For our legitimate interests including: <ul style="list-style-type: none"> - Business administration; - Ensure compliance with our policies and procedures | <ul style="list-style-type: none"> Name, address, telephone and e-mail addresses; Work address/location |
| <ul style="list-style-type: none"> For organisational planning, & development To conduct business operations including delivering our shared services and managing our contracts, communicating information relating to our shared services including training and events; To provide membership benefits | <ul style="list-style-type: none"> To enter or carry out the contract For our legitimate interests including: <ul style="list-style-type: none"> - Business administration; - Ensure compliance with our policies and procedures | <ul style="list-style-type: none"> Contact details, including name, address, telephone and e-mail addresses Work address/location |
| <ul style="list-style-type: none"> To ensure a safe and secure work environment | <ul style="list-style-type: none"> For our legitimate interests to verify the identity of individuals accessing our premises to prevent and detect theft | <ul style="list-style-type: none"> Name • Work location • Photographs/Images of you |

| | | |
|--|---|--|
| <ul style="list-style-type: none"> • To allow you to access premises and our systems • To provide systems administration, support, development, management and maintenance | <ul style="list-style-type: none"> • To enter or carry out the contract • For our legitimate interests including: <ul style="list-style-type: none"> - Business administration; - Ensure compliance with our policies and procedures | <ul style="list-style-type: none"> • Computer or facilities access and authentication information; • Identification codes, passwords, answers to security questions. |
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We review our privacy information periodically. Last updated October 2021.