

## **Birkbeck, University of London**

Birkbeck exists to provide life changing educational opportunities for its students and undertake cutting-edge research for the public good. In order to carry out this mission, it is necessary to process personal data.

We take our responsibilities to process your data transparently, fairly, lawfully, safely and securely very seriously. This document is part of our efforts to keep you informed about how we treat your data.

### **PRIVACY NOTICE**

#### **For the purpose of processing online payments**

##### **About Birkbeck**

Birkbeck College (also known as Birkbeck, University of London) is the data controller for all of the personal data that it holds and processes and is subject to the General Data Protection Regulations (GDPR). Birkbeck is registered with the Information Commissioners Office (ICO) registration number Z718111X

- Address: Birkbeck College, Malet St, Bloomsbury, London, WC1E 7HX
- Birkbeck's Data Protection Officer can be contacted by emailing [dpo@bbk.ac.uk](mailto:dpo@bbk.ac.uk)

If you have any queries about how we use your data, or wish to exercise your rights with regard to your data including, making a subject access request, please contact [dpo@bbk.ac.uk](mailto:dpo@bbk.ac.uk)

##### **About Birkbeck's approach to personal data processing**

In common with all universities, Birkbeck processes the personal data of many individuals in order to carry out its mission.

You will find a complete set of information describing our data processing activities, our data privacy policy, relevant privacy notices, information about the rights of individuals whose data we process and how to exercise these rights on our website at [www.bbk.ac.uk/privacy](http://www.bbk.ac.uk/privacy).

Birkbeck has many different types of relationship with many different groups of people, and some people have more than one relationship with Birkbeck (for example one person may be both a student and member of staff). It is not possible to provide one single privacy notice that accurately describes all these processing activities. Therefore separate notices are provided that describe each processing activity. It should be noted that more than one privacy notice may apply to the processing of your personal data for different purposes. This should be made clear to you at the point where your personal data is collected. It should also be clearly described within the privacy notice itself. All our privacy notices are available at [www.bbk.ac.uk/privacy](http://www.bbk.ac.uk/privacy) and if you are in any doubt please contact [dpo@bbk.ac.uk](mailto:dpo@bbk.ac.uk).

##### **About our privacy notices**

This privacy notice explains how Birkbeck collects, uses and shares personal data and your rights in relation to the that we hold about you. It includes information about how personal data is used, and the nature of any processing by other data processors or controllers.

## **The processing purpose covered by this notice**

This privacy notice applies to Birkbeck's processing of personal data for the purpose taking one-off online payments securely so that we can allow customers to pay for services online, such as booking tickets for events or topping up their print balance.

## **What data we collect**

- Birkbeck may obtain, hold and process the following personal data:
  - **Contact details** - including; name, email address, billing address, contact telephone number
  - **User data** – including your IP address when you attempted to make a transaction
  - **Payment status information** – including an indication as to whether the transaction was successful or not, and a transaction ID that identifies it

**Important note:** Birkbeck systems do not collect any payment card details whatsoever. These are collected securely by Global Payments Inc systems.

## **Where we collect it from**

- Direct from you, online
- From Birkbeck's payment processor, Global Payments Inc. after a transaction has been made

## **How we use the data**

We use the data to allow the users of Birkbeck systems to pay for services, such as event attendance, securely and in a compliant manner.. This includes:

- Securely passing the data collected by Birkbeck systems to the payment processor
- Logging the outcome of an attempted transaction for reporting purposes
- Allowing Birkbeck provide services on the basis of successful transactions
- Offering refunds on transactions where appropriate

Without doing this, Birkbeck would not be able to accept on-line payments securely and in line with our compliance obligations, including financial reporting requirements.

## **Under what lawful basis we process your personal data**

Birkbeck uses your personal data under different lawful bases depending on the process being performed. The following are the legal bases identified and examples of the data processing activity to which they apply:

- **Contract** – For the purposes of processing online payments Birkbeck collects and processes your data on the lawful basis of the performance of a contract. (Article 6 (1) (b))

## **How long we keep your data for this processing purpose**

Data processed for this purpose is kept for up to 7 years from the time of entry.

## **Sharing your data with other Data Controllers**

The data collected by Birkbeck systems is shared with Global Payments Inc. for the purposes of processing online payments.

### **Third Party Service Providers (use of Data Processors)**

Birkbeck uses a number of carefully selected third parties to provide services on its behalf. In some cases this requires some elements of the data we hold about you to be passed to them for the express purpose of providing a service to you on our behalf. In each case a data sharing agreement is in place that prevents the third party from making any use of the data provided for any purpose other than that expressly agreed, and requiring the provider to securely destroy the data once the service has been provided. Details of these service providers are available at [www.bbk.ac.uk/privacy](http://www.bbk.ac.uk/privacy).

### **International**

In some instances the College may transfer personal data to parties located in other countries, including some outside of the European Economic Area (EEA). This may be because either Birkbeck staff, a Data Processor (or Sub-Processor) contracted by Birkbeck, or another Data Controller who data is shared with are located outside the EEA.

All instances of overseas transfers of personal data are subject to appropriate technical safeguards and contractual provisions incorporating appropriate assurances to ensure the security of the data and full compliance with legislative and regulatory requirements.

### **Your personal data rights**

You have the following rights with regard to your personal data held by the College:

- The right to request access to your personal data held by the College.
- The right to have inaccurate or incomplete personal data rectified.
- The right to erasure of personal data – this will only apply where there is no legitimate reason for the College to continue to process the personal data.
- The right to restrict the processing of personal data – you have the right to block the processing of their personal data by the College in specific situations.
- The right to data portability – you have the right to request provision of some elements of your information in digital form in order to provide it to other organisations.
- The right to object to automated decision making and profiling – you have the right to object to decisions taken by automatic means without human intervention in some circumstances.
- All requests to exercise any of these rights should be made to the College's Data Protection Officer, by emailing: [dpo@bbk.ac.uk](mailto:dpo@bbk.ac.uk).

**Complaints** - If you are unhappy with the College's handling of your personal data or believe that the requirements of GDPR may not be fully complied with, you should contact the College's Data Protection Officer in the first instance. You may also follow the College's formal complaint procedure, and you also have the right to submit a complaint to the Information Commissioner's Office; further details can be found at [www.ico.org.uk](http://www.ico.org.uk).

### **Version History & Review**

This privacy notice will be subject to periodic review. Any material changes will be communicated to those affected in an appropriate manner as and when they are required.

<b>Version</b>	<b>Effective Date</b>	<b>Reason for change</b>
BBKPN012.0	28 May 2019	First version