

QMUL/QMSU GDPR Compliance Matrix

Premise One: QMSU membership is automatic unless a student notifies the University/Union otherwise (**1994 Education Act** - 22.2 (c) *a student should have the right (i) not to be a member of the union, and students who exercise that right should not be unfairly disadvantaged, with regard to the provision of services or otherwise, by reason of their having done so*) and as set out in **QMUL Code of Practice: 10**. *Students have the right to opt out of membership of QMSU by notifying QMUL or QMSU in writing. This is reflected in Article 10.1.1 of the Articles of Association. QMUL's expectation is that students who have opted out should normally be able to make full use of QMSU's services**.

Premise Two: QMUL shares student data with QMSU for the following reasons (GDPR Lawful Basis for Processing): to allow them to deliver services on behalf of QMUL (Fulfilment of Contract) and to enable compliance with the duties of both QMUL and QMSU under the 1994 Education Act (Legitimate Interest).

Services	Lawful Basis for Processing				Data Protection Policy
Area	Consent	Contract	Legitimate Interest	Justification	Privacy Statement
QMotion		X		QMUL Enrolment Declaration/Members sign-up to Gym (<i>including General Public</i>)	Qmotion Privacy Statement
Sports Clubs		X		QMUL Enrolment Declaration/Members sign-up to Club	Affiliated Student Group Privacy Statement
Societies		X		QMUL Enrolment Declaration/Members sign-up to Society	Affiliated Student Group Privacy Statement
Volunteering		X		QMUL Enrolment Declaration/Members sign-up to Volunteer	Affiliated Student Group Privacy Statement
Course Reps			X	QMUL Enrolment Declaration/ 1994 Education Act	QMSU Privacy Statement

Elections			X	QMUL Enrolment Declaration/ 1994 Education Act	QMSU Privacy Statement
Newsletters		X	X	QMUL Enrolment Declaration	QMSU Privacy Statement
Surveys		X	X	QMUL Enrolment Declaration	QMSU Privacy Statement
Skills Award		X		QMUL Enrolment Declaration/Student Activity Leaders etc. sign-up to Award	QMSU Privacy Statement
Advice and Advocacy		X	X	QMUL Enrolment Declaration	QMSU Advice and Advocacy Service Statement
ICO Guidance					
<p>Fulfilment of Contract “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.”</p> <p>You have a lawful basis for processing if: you have a contract with the individual and you need to process their personal data to comply with your obligations under the contract. ICO Guidance 22 March 2018 - 1.0.65171</p>					
<p>Legitimate Interest “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”</p> <p>You can rely on legitimate interests for marketing activities if you can show that how you use people’s data is proportionate, has a minimal privacy impact, and people would not be surprised or likely to object. ICO Guidance 22 March 2018 - 1.0.65171</p>					
<p>*QMSU Membership Bye-law 1</p> <p>4.3 A student who has opted out is not entitled to:</p> <ul style="list-style-type: none"> (i) Vote in, or stand for office in, the Union elections; (ii) Speak or vote at an Annual Members Meeting or Company Law General Meeting of the Union; (iii) Vote in a Union Referendum; and (iii) Hold an elected position in a club or society of the Union. 					