

Student Data Privacy Statement

Last revised: 7 October 2026

Introduction

The Union of Brunel Students (the Union) is committed to protecting your personal information and being clear about how we use it.

This statement explains:

- what personal information we collect and where we get it from
- why we use it
- who we may share it with
- how we protect it
- how long we keep it
- your rights and how you can exercise them

We use personal information to administer Union membership, provide services and support, support student representation and democratic participation, run activities and events, communicate with students and understand how our services are being used so we can improve them.

We will only use your personal information where we have a lawful basis to do so and where the processing is necessary and proportionate.

Who we are

The Union of Brunel Students is an independent organisation representing students at Brunel University of London.

For data protection purposes, the Union is the organisation responsible for the personal information it processes.

If you have any questions about how we use your information, you can contact us:

Email: union.dataprotection@brunel.ac.uk

Telephone: 01895 269269

Where we collect your information from

From Brunel University London

When you enrol at Brunel University London, the University provides us with information we need to administer Union membership and provide representation and services to eligible students.

This can include information such as your name, Brunel email address, student status, course and year of study and other information needed to administer your membership and democratic rights.

The University provides updated information to us regularly so that our membership records remain accurate.

Directly from you

We collect information when you choose to provide it to us, for example when you:

- join a club, society, network or activity
- attend or book an event
- take part in research, surveys or feedback
- contact us for advice, support or information
- purchase a product, ticket or service
- take part in sport or other activities
- contact us about your membership or Union services

From other organisations

We may receive information from other organisations where this is lawful and necessary for us to provide our services or carry out our functions. This may include Brunel University London, service providers and organisations involved in activities or events we deliver.

From other sources

We may use information that is publicly available or that you have chosen to make available, such as information from public social media profiles, where this is lawful, necessary and relevant to our work.

Websites and digital services

When you use our websites or digital services, we may collect information such as your IP address, browser type, operating system, device information and information about how you use our websites.

We use cookies and similar technologies for purposes such as making our websites work, understanding how they are used and improving our digital services.

More information about cookies is available in our Cookies Statement.

Purchases

When you purchase something from the Union, we may collect information such as your name, contact details, order details and transaction information.

Payments may be processed by third-party payment providers. We do not routinely store your full payment card details ourselves.

What information do we use and why?

The information we use depends on how you interact with the Union.

Membership

We may process information such as:

- your name and contact details

- student and membership information
- course and year of study
- student status
- information needed to establish eligibility for Union services or democratic participation

We use this information to administer membership, provide services and representation, communicate with members, support democratic participation and meet our legal and governance responsibilities.

Activities, events, clubs, societies and sport

When you take part in Union activities, we may process information such as your date of birth or age, payment information, participation records, survey responses and information about reasonable adjustments where this is necessary.

We use this information to organise and administer activities, events, clubs, societies and sport, manage participation and provide relevant services.

Special category data

Some information may be considered special category personal data under data protection law, such as information about health or disability.

We will only collect or use this type of information where it is necessary for a specific purpose and where we have an appropriate lawful basis and additional condition under data protection law.

For example, this may include information you provide so that we can make reasonable adjustments for an activity or event.

We will not use special category data simply because it may be useful or interesting to us.

Understanding our members and improving our services

We use information about how students interact with the Union to understand engagement and improve our services.

Where appropriate, we may use information already held within Union systems to identify suitable audiences for particular communications. For example, information about participation in an activity or purchase of an event ticket may help us identify students for whom a particular communication is relevant.

Where we do this, the underlying information used to identify an audience is not routinely transferred to Mailchimp as part of the automated Mailchimp integration.

We will only combine or use information in this way where it is lawful, necessary and proportionate.

How we communicate with you

We use your contact details to communicate with you about your Union membership, representation, services, support, elections, referenda, activities, events, clubs, societies, sport and other opportunities.

Some communications are necessary for us to provide our services or carry out our democratic and membership functions. Others may be promotional communications.

Where the rules on electronic marketing apply, we will only send promotional communications where we have a lawful basis to do so under data protection law and the Privacy and Electronic Communications Regulations (PECR).

You can unsubscribe from promotional communications where an unsubscribe option is provided.

Some essential or service-related communications may still be sent where we need to communicate with you about your membership, rights, services or democratic participation.

Mailchimp

We use Mailchimp, provided by The Rocket Science Group LLC, to help us send and manage some of our email communications.

Mailchimp acts as a third-party data processor on our behalf.

What information is transferred to Mailchimp?

Our membership system, MSL, is automatically synchronised with Mailchimp every 24 hours.

The automated transfer is limited to:

- your first name
- your Brunel email address

Other information held by the Union, such as sports membership or event purchase information, may be used within Union systems to identify an appropriate audience for a particular communication. This information is not routinely transferred to or stored in Mailchimp as part of the automated integration.

This means we do not use Mailchimp as a general student database.

How we use Mailchimp

We use Mailchimp to:

- send Union communications
- support democratic communications
- communicate about Union activities, services, events and opportunities
- manage mailing lists and communication preferences
- monitor the effectiveness of our communications
- understand engagement with emails so we can improve future communications

Mailchimp can record information about how recipients interact with emails. This can include whether an email was opened or clicked, the date and time of the interaction, the device or email client used, IP address and approximate location.

Mailchimp uses tracking technologies such as web beacons to provide this engagement information.

We use this information to understand whether our communications are reaching students and how they are being used. We do not use Mailchimp engagement information to create a general profile of students for unrelated purposes.

Who has access to Mailchimp?

Access to Mailchimp is restricted to authorised Union staff who need it as part of their role.

We use individual user accounts, role-based access and multi-factor authentication to help protect information held within Mailchimp.

Our lawful basis for processing

The Union generally relies on **legitimate interests under Article 6(1)(f) of the UK GDPR** when processing student information for its membership, representation, services, activities, democratic participation and communication functions.

Our legitimate interests include:

- communicating with members
- facilitating democratic participation and representation
- providing services, support and opportunities to students
- enabling participation in Union activities
- maintaining accurate membership and communication records
- understanding engagement and improving our services

We have carried out a Legitimate Interests Assessment which considers the necessity and proportionality of this processing and the impact on students.

We recognise that some processing may require a different lawful basis depending on the particular circumstances.

We follow data protection law and PECR when using your information to send communications. This means we consider the type of communication and the rules that apply before sending it.

International transfers

Mailchimp is provided by The Rocket Science Group LLC, a US-based organisation. Your personal information may therefore be transferred to and processed in the United States and, where necessary, other countries in which Mailchimp or its service providers operate.

Mailchimp states that it is certified under the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework and the Swiss-U.S. Data Privacy Framework.

For transfers of UK personal data to participating US organisations, the UK Extension to the EU - U.S. Data Privacy Framework provides a recognised transfer mechanism.

Mailchimp also has contractual safeguards in place through its Data Processing Addendum, including Standard Contractual Clauses and the UK Addendum.

We use these safeguards to protect your personal information when it is transferred outside the UK and will review Mailchimp's international transfer arrangements if they change.

Sharing your information

We may share personal information where this is necessary, lawful and appropriate for the purposes described in this statement.

This may include sharing information with:

- Brunel University London
- organisations helping us deliver events, activities, sport or other services
- payment providers
- technology and service providers acting on our behalf
- professional advisers and contractors
- regulators, law enforcement or other organisations where we are legally required to do so

Where we use a service provider to process personal information on our behalf, we will put appropriate contractual and data protection arrangements in place.

We will not sell your personal information to other organisations for their own marketing purposes.

Publishing information about elected representatives and student leaders

Where necessary for Union governance and representation, we may publish information such as the name and Union or University email address of elected representatives, student leaders or other people carrying out a representative role.

Retention

We will not keep personal information for longer than is necessary for the purpose for which it was collected, unless we have a legal, regulatory or other legitimate reason to keep it for longer.

Different types of information are kept for different periods depending on why we hold it.

Membership information is generally retained for six years after the end of the relevant student relationship. This allows us to maintain appropriate records of membership and meet our legal, operational and accountability requirements.

Other information may be kept for different periods depending on the purpose for which it was collected and our legal or operational requirements.

Our retention arrangements are reviewed to ensure that personal information is not kept unnecessarily.

Mailchimp retention

Our Mailchimp mailing list is maintained through an automated 24-hour synchronisation with MSL.

This is intended to ensure that current students remain on the active mailing list and that students who are no longer current students are removed.

If you unsubscribe from communications, information needed to record your preference may be retained so that we can respect your choice and avoid inadvertently adding you back to a mailing list.

Suppression records are reviewed regularly to ensure that retained information remains necessary and up to date.

We will not retain personal information in Mailchimp for longer than necessary.

Keeping your information secure

We take appropriate technical and organisational measures to protect personal information against loss, misuse, unauthorised access, alteration or disclosure.

Access to personal information is restricted to people who need it for their role.

Staff who process personal information are required to complete data protection training.

We also use measures such as access controls, individual user accounts and multi-factor authentication where appropriate.

Your rights

Under data protection law, you may have the right to:

- ask for a copy of the personal information we hold about you
- ask us to correct inaccurate or incomplete information
- ask us to delete your personal information in certain circumstances
- ask us to restrict how we use your information in certain circumstances
- object to certain types of processing, including direct marketing
- receive certain personal information in a portable format where the right applies
- withdraw consent where we are relying on consent to process your information

Your rights are subject to certain exceptions and may not apply in every situation.

If you unsubscribe from promotional communications, this does not necessarily stop all communications from the Union. We may still need to send essential membership, service or democratic communications.

How to exercise your rights

If you want to exercise one of your data protection rights or have a question about how we use your information, contact:

Email: union.dataprotection@brunel.ac.uk

Telephone: 01895 269269

We may need to confirm your identity before responding to a request.

We will deal with requests within the timescales required by data protection law.

You do not have to use a particular form or send a request by post to exercise your rights.

Complaints

If you have concerns about how we use your personal information, please contact us first so that we can try to resolve the issue.

If you are not satisfied with our response, you can complain to the Information Commissioner's Office (ICO), which is the UK's independent regulator for data protection.

Changes to this statement

We may update this statement from time to time to reflect changes to our services, how we use personal information, technology or data protection requirements.

When we make significant changes, we will take reasonable steps to make students aware of them.

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