Privacy Notice

Name of Process: University online store (https://store.napier.ac.uk/)

*Data Controller	Edinburgh Napier University
*Purposes for collection/processing	After customers create an account on the University store, the data collected is used in the following ways • Provision of goods and/or services requested by customers • Web statistics: To improve the service for our clients and to analyse our web site's use without identifying you as an individual. • Marketing: In order that we may keep you informed by post, e-mail, telephone or other electronic means of the news, events or services that may be of interest. • Market Research: From time to time we may ask you to take part in research surveys to assist us with improving our service to existing and potential students. Additionally, further information is required by the organiser/school if the customer is signing up to an event or course. This information is unique to a particular event/course and is collected separately when a customer registers for the event/course. If purchasing a course, students should review the University's main Student Privacy Notice which is available here.
*Legal basis	The primary legal basis the University relies on is Article 6(1)(e) of the UK General Data Protection Regulation (UK GPDR), i.e. for the performance of a task carried out in the public interest or in the exercise of the official authority vested in the controller, namely the University's Statutory Instruments ("for the objects of providing education, carrying out research, and promoting teaching, research and general scholarship" and the administration thereof). Purchasing of goods or services, however, necessitates the creating of contracts, and if goods or services are purchased processing will also fall under Article 6(1)(b) of the UK GDPR: "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". This includes processing by the external companies Global Payments and WPM Education/Flywire, where applicable (for further information, please see below). Please note that it will be necessary for us to process your personal data to meet our contractual obligations to provide you with goods and/or services.
Whose information is being collected?	We collect information from students, or other individuals, who purchase items (goods, courses, or events) listed on the store.

What type/classes/fields of information are collected?	Mandatory fields are: email, title, first name, last name, contact telephone, address details. Optional fields are: company/organisation, student matriculation number When an individual signs up for an account, only their name and email address are collected. Postal address details, however, will be requested and stored later if the individual requires postal delivery.
Who is the information being collected from?	We primarily collect information from individuals who are making the purchase. Occasionally, however, individuals (e.g. parents) may make a purchase on behalf of another person, and in this case we may collect some information about the intended recipient.
How is the information being collected?	Online when they register, when customers make a purchase or when they sign up for an event
*Who is personal data shared with internally and externally?	Internally, we share personal data where necessary to provide goods or services requested – e.g. with a school or department responsible for a course or event. In all cases, the University is a data controller for this processing. Externally, where applicable, we share data with WPM Education/Flywire (software provider), and Global Payments (payment processing). Please see "How secure is the information?" below for further details.
How secure is the information?	For services provided locally by Information Services, information is stored on servers located in secure University datacentres. These datacentres are resilient and feature access controls, environmental monitoring, backup power supplies and redundant hardware. Information on these servers is backed up regularly. The University has various data protection and information security policies and procedures to ensure that appropriate organisational and technical measures are in place to protect the privacy or your personal data. The University makes use of a number of third party, including "cloud", services for information storage and processing. Through procurement and contract management procedures the University ensures that these services have appropriate organisational and technical measures to comply with data protection legislation. For services hosted externally (Global Payments and WPM Education/Flywire), these have been assessed in accordance with our standard procurement procedures, including checks on security, and we can advise that both meet PCI DSS (Payment Card Industry Data Security Standard) requirements.

Who keeps the information updated?	We primarily rely on customers to keep their information updated, by editing their accounts (e.g. to ensure card payment details are up to date), although Corporate Systems, contactable via CorporateSystems@napier.ac.uk, can update details if requested by the customer.
*How long is the information kept for?	We are legally required to retain details of commercial transactions for 6 years after the end of a contract. Further information on our retention schedules is available here: https://staff.napier.ac.uk/services/governance-compliance/governance/records/Pages/RecordsRetentionSchedules.aspx Information associated with a customer's account will not be retained if the customer chooses to delete their account (which can be done at any time, by contacting Corporate Systems via CorporateSystems@napier.ac.uk).
*Will the data be used for any automated decision making?	No
*Is information transferred to a third country outside the UK?	The University does not transfer any of your personal data outside the UK. Both Global Payments and WPM Education/Flywire may transfer personal data necessary for their services outside of the UK. Their privacy policies are available here: - https://www.flywire.com/legal/privacy-policy - https://www.globalpayments.com/en-gb/privacy-statement

*This information is provided to supplement the University's main Privacy Notices and it is recommended that appropriate notices are reviewed to provide full information about how the University processes personal data.
You can access all the University's privacy notices using the following link: https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/statement.aspx
*You have a number of rights available to you with regards to what personal data of yours is held by the University and how it is processed – to find out more about your rights, how to make a request and who to contact if you have any further queries about Data Protection please see the information online using the following URL: https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/default.aspx