

## Privacy Notice (online payments)

### Contents

A. Introduction .....	1
B. Who is processing personal data .....	1
C. What personal data do we process.....	1
D. The legal basis for processing your personal and special category data .....	2
E. What we use personal and sensitive data for .....	2
F. Automated decision making .....	2
G. Who we share your personal data with .....	2
H. Changes to your personal data .....	3
I. Will your personal data be sent or stored abroad?.....	3
J. How long do we keep your personal data? .....	3
K. How you can access personal information the University holds about you .....	3
L. Contact us .....	4
M. Questions or concerns .....	4
N. Evaluation and review.....	5

### A. Introduction

The purpose of this notice is to inform you about how the University collects, uses and shares personal data when you make online payments, and your rights in relation to the personal data we or our processors hold.

### B. Who is processing personal data

Leeds Trinity University determines why and how your personal data is used and is considered to be the data controller of the personal data. This places legal obligations on the University.

The University is registered with the Information Commissioner's Office as a data controller under the reference Z4817023.

### C. What personal data do we process

Leeds Trinity University processes personal data that is necessary for us to administer and deliver services to you. This includes:

- personal data you provide to process an online payment
- financial information gathered for the purposes of administering tuition and accommodation fees and bonds
- personal data you submit to receive goods or services.

We use [WPM Education Ltd](#) to process online payments on behalf of LTU. Further information explaining in detail the personal data WPM collects, how it is stored and kept safe can be found [here](#).

### Special category data

We do not process "special category data" for online payments.

## **D. The legal basis for processing your personal and special category data**

### **(i) Contract**

We may process your personal data because it is necessary for us to do so in order to fulfil the contract you enter into with the University.

### **(ii) Legitimate interests**

We may use and process your personal information where it is necessary for us to pursue our legitimate interests or a third party's legitimate interest. We would do this in a way which does not materially impact your rights, freedom or interest.

### **(iii) Legal obligation**

We may also process your personal data for our compliance with legal obligations. This can include:

- compliance with regulatory obligations such as anti-money laundering laws and safeguarding requirements
- assisting with investigations (including criminal investigations) carried out by the police and other competent authorities
- complying with court or other competent authority orders

### **(iv) Vital interests**

The University will only rely on vital interests as a lawful basis for processing your personal data where it is necessary to protect someone's life.

### **(v) Consent**

The University will use consent as a lawful basis for some processing. Where we do so we always provide you with the choice as to whether or not to opt in to such processing.

- We may process personal data provided by you for a specific purpose or purposes (for example, disability, catering preferences or lifestyle status for event management)
- We may keep you informed by email about relevant products and services.

## **E. What we use personal and sensitive data for**

Leeds Trinity University processes your personal data for the following reasons:

- maintaining records and administering finances
- the prevention and detection of crime and assisting investigations carried out by relevant authorities
- dealing with complaints.

## **F. Automated decision making**

The University does not make any automated decisions about you using your personal data.

## **G. Who we share your personal data with**

Your data will be shared internally within the University with staff and departments that require the use of the data in order to administer and provide University services to you.

Data will be shared externally where the University has a legitimate need to do so in fulfilling the contract the University has with you or has a legal obligation to provide data. The following list provides examples of the most common occasions on which it is necessary to share your data.

- Data Sharing between the University and WPM is limited to Payee Name, email address, student number, last four digits of the card used, card expiry date, post code, item purchased and amount paid.
- We provide information to delivery couriers, for example, to perform a specific service.
- We will provide information to the police and other enforcement agencies in the event of an emergency or where required to assist the prevention or detection of crime.

## **H. Changes to your personal data**

It is your responsibility to notify the University as soon as possible if any of the data held about you needs to be updated or is incorrect.

## **I. Will your personal data be sent or stored abroad?**

Some of the personal data we process about you may be transferred to, and stored at, a destination outside the European Economic Area (EEA), for example where personal data is processed by one of our software suppliers who is based outside the EEA or who uses data storage facilities outside the EEA.

In these circumstances, your personal data will only be transferred where the transfer is subject to one or more of the appropriate safeguards for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission); a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection.

## **J. How long do we keep your personal data?**

The University will retain personal data for no longer than is necessary to fulfil its contractual and regulatory obligations in line with our retention schedule available [here](#).

## **K. How you can access personal information the University holds about you and other rights you have**

### **1. The right to be informed**

You have the right to be informed about the collection and use of your personal data and this privacy notice is part of the transparency requirements of data protection legislation.

### **2. Right of access**

You have a right of access to your own personal data held by the University. A request to see the personal data held by the University can be made through a Subject Access Request. Further information about how to request this is available [here](#).

### **3. The right to rectification**

You have the right to have inaccurate personal data held by the University rectified or completed if it is incomplete. This can be done by contacting the Finance team at: [finance@leedstrinity.ac.uk](mailto:finance@leedstrinity.ac.uk).

#### 4. The right to erasure

Once personal data collected by the University is no longer necessary for the purpose for which it was collected and processed, you may have the right to have the data erased. The University manages the retention period of data held through its retention schedule.

#### 5. The rights to restrict processing and to object to processing

In certain circumstances you have the right to restrict the processing of your personal data. This is likely to arise when there is an issue concerning the accuracy or the legitimate grounds for processing of the personal data.

#### 6. The right to object to processing

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

The University will stop processing the personal data unless there are compelling legitimate grounds for the processing, which override your interests, rights and freedoms.

#### 7. Rights to data portability

You have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format. The University will respond to any Subject Access Requests in compliance with this. Further information about how to request this is available [here](#).

You have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format and, where the processing is carried out by automated means, request that we transmit those data to another data controller.

#### Note:

Detailed guidance on all of the rights you have with regard to the personal data that we hold and process about you is available on the ICO website here - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

## L. Contact us

If you have any queries about this privacy notice or how we process your personal data you can contact us at: [finance@leedstrinity.ac.uk](mailto:finance@leedstrinity.ac.uk)

## M. Questions or concerns

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with our Data Protection Officer. If you would like to report a data security breach (e.g. if you think your personal data has been lost or disclosed inappropriately) or if you would like to complain about how the University has used your personal data, please contact the University's Data Protection Officer at [dataprotection@leedstrinity.ac.uk](mailto:dataprotection@leedstrinity.ac.uk) or write to

Data Protection Officer  
Leeds Trinity University  
Horsforth  
Leeds  
LS18 5HD

Should you be dissatisfied with our handling of your concerns, you have the right to complain to the Information Commissioner at <https://ico.org.uk/concerns/handling>.

## **N. Evaluation and review**

This policy will be formally reviewed every year by the Data Protection Officer and the relevant department(s) within the University. In addition, the effectiveness of this Policy will be monitored as necessary on an on-going basis to ensure it is compliant with relevant legislation.

This policy was last updated in June 2021.