

# University of Kent Privacy Notice for business contacts and external stakeholders

## How we use your data

This Privacy Notice outlines how the University of Kent collects, uses and manages the personal information of individuals as part of our business activities and community engagement in accordance with data protection law.

If you are an applicant, an alumni or a research participant, please see the relevant privacy notices [here](#).

The University of Kent is registered as a 'Data Controller' under registration number Z6847902. View the full entry on the [register](#).

## How we collect your personal information

Your personal data is obtained:

- directly from you, through online or paper forms, email or by telephone when you:
  - interact with the University as part of your role working for another organisation
  - are contracted to complete work on behalf of the University of Kent
  - are a member of the public visiting or making enquiries related to our core higher educational activities (e.g. as a parent of a current student)
  - hire university conference spaces and accommodation
  - utilise our services open to the public (such as sports centre membership)
  - engage with the university at an event or as part of its civic mission to deliver social, educational, cultural public and economic benefits across Kent and Medway.
- from your employer (where applicable)
- from University of Kent systems holding your personal data (for example the online shop, CCTV footage, information about your use of our information and communication systems or visitor identity card records)
- from staff or students if you are named as an emergency contact or next of kin held on their file
- in some cases this information will be in the public domain – for example company, organisation or public office websites or directories (such as Companies House)

## Categories of information we collect

Personal data we collect about you in connection with our business and community activities:

- your name
- your contact telephone number (work number if you are interacting with us as part of your role as an employee of a business we interact with)
- your email address and marketing preferences
- your business address (where applicable)
- details of the engagement (such as who you work for or the contract you are working on) or
- the nature of your interaction with the University (such as the event or community activity attended, your role as an emergency contact, your opinions as a referee for staff or students) or
- the project you are working on (for example as part of a collaborative research project or enterprise initiative)
- your correspondence with us, comments and feedback
- payment details (if you are making a purchase)
- photographs or videos (where you give permission for us to record your image as part of an educational event (e.g. a guest lecture) or promotional activity (e.g. website feature) and where you attend an online meeting or presentation, we may record those.
- Vehicle details including car registration number if you visit our site.
- any accessibility or arrangements needed to meet your specific needs or requirements including those you request when you attend events or that are needed for you to interact with us (where applicable).

## How we use your personal information

We will use your information in connection with your business or engagement activity with us, for the management and administration of our business activities and civic mission:

- To allow contractors to provide services to the University.
- Your name, email address and telephone number will be used to contact you as a business or community engagement contact, business partner or employee working for our partners or for other organisations or companies with whom we interact. For example when you are carrying out services or works on site that are being completed for the University by your employer or yourself (where you are a sole trader).

- Your name and email address will be used to identify you within our systems so that our records are accurate and up-to-date.
- Your name and email address will be used to invite you to an event or conference on a topic you have expressed an interest in/have an associated interest in.
- Your name and email address will be used to send you communications about the work of the University as it relates to the topic you have expressed an interest in.
- To seek your engagement, opinion or official support on matters related to the University.
- To respond to your requests for information.
- To contact you in relation to a specific purpose relevant to the nature of our interaction with you (e.g. in the event of an emergency where you are named as an emergency contact or about the project or business where you or your employer is a collaborating partner).
- To provide you with a specific service or use of a facility such as the library or sports facilities
- To fulfil a contract you have with the University (e.g. online shop purchase).
- To record your image for an event or promotion (with your agreement)
- To facilitate visits to our campus for commercial, community or similar purposes
- To meet any health and safety or other legal requirements relevant to the event, on site activity or any business or financial engagements.
- To govern our business in accordance with our constitution and ordinances (in particular where you are a member of a University committee or governing body).
- To monitor the use of ICT systems and ensure compliance with University's ICT policies.
- To ensure the safety and security of the University and for the prevention and detection of crime

Where we have a contractual basis for using your personal data, if you do not provide the information needed, we may not be able to provide you with the service contracted.

## Our lawful basis for processing your data

We rely on the following lawful basis as allowed by the UK GDPR for processing your personal data as this is necessary for:

- our contract with you (where applicable if you are a sole trader we directly contract with; if you are a purchaser in our online shop or use our services such as the sports centre)– Article 6(1)(b)
- the performance of a task carried out in the public interest (activities related to our core educational or research purposes) – Article 6(1)(e)

- a legal obligation (e.g. to maintain University facilities and provide a safe and functional environment such as when you attend our site to work or to attend an event) – Article 6(1)(c)
- to protect your vital interests or those of another person (in an emergency)– Article 6(1)(d)
- the purpose of our legitimate interests or those of a third party (unless those interests are overridden by your interests, rights or freedoms) - Article 6(1)(f).

Our legitimate interests are: facilitating our contract with your employer/our business partners; promoting our services and events; ensuring and monitoring the safety and security of our IT systems and infrastructure; ensuring the safety and security of our site (including the use of CCTV); crime prevention and security incident investigation purposes.

For limited purposes (such as sending promotional emails) we will seek your consent - Article 6(1)(a)

As we also use **special category data**, we must identify a further basis for processing that data. The processing in relation to accessibility, health or other needs is necessary for:

- reasons of substantial public interest - Article 9(2)(g) (statutory purposes, safeguarding, preventing or detecting unlawful acts; preventing fraud, insurance)
- explicit consent – Article 9(2)(a) where you have explicitly requested we make accommodations to meet a health, dietary or accessibility need or to discuss your requirements as part of a service you have requested (e.g. sports centre services).

## Who your information will be shared with

We use third party organisations (known as data processors) who carry out services on the University's behalf under contract. We will ensure that only the minimum amount of relevant personal data necessary for the purpose is transferred. We will ensure that contractual agreements exist to ensure compliance with data protection law and that data is used solely under our instruction.

- Microsoft (the University uses Microsoft 365 as its main IT platform)
- Tribal Group Plc (Kent Vision)
- Apogee Corporation Ltd (Online print and device and IT asset management provider)
- Britannic Technologies Ltd (Telephony Services)
- Communis Ltd/ISARR (Health & Safety incident reporting system)
- Diligent Corporation (for minuting, governance and committee management)
- DocuSign International (EMEA) Ltd (electronic signature tool)
- Qualtrics (where we use that platform to conduct an online survey)
- Invida Limited (our facilities management system)

- EPOS Now (UK) Ltd, Flywire Inc and Western Union Services GB Ltd (payment processing)
- Jotform Ltd (part of Jotform Inc) (form filling functionality)
- Kinetic Solutions Ltd (conference, catering and accommodation management)
- Monday Inc (project and task tracking)
- Unit 4 Group Holding BV (finance accounting system)
- Website provider
- Worktribe Ltd (for research project and grant support)
- XN leisure systems (sports centre membership).

We also share information with the following organisations where necessary for their own legitimate purposes (as data controllers – please see **their own privacy notices** for further information as to how they use your data):

- Your employing organisation (where necessary for our business or project interaction).
- University or other business partners (where relevant to the business or engagement activity) For example, Canterbury Christ Church University in relation to the Kent and Medway Medical School
- Website and social media providers
- Couriers and delivery companies
- Courts, police or regulatory bodies (where necessary for legal proceedings or investigations; crime prevention purposes or for transaction checks )
- Government departments or regulatory bodies (if relevant e.g. for carrying out regulatory reporting required by law such as HMRC in relation to business transactions)
- To successor bodies.

Sometimes it is necessary for your personal information to be shared:

- with competent authorities (such as the police, NCA) or action fraud for law enforcement purposes (for on substantial public interest reasons – Article 9(2)(g) – for preventing or detecting unlawful acts, safeguarding or fraud purposes.
- with our professional advisors where it is necessary for the establishment, exercise or defence of legal claims – Article 9(2)(f).

Occasionally the University may, if appropriate, legitimate and necessary, rely on relevant exemptions to UK GDPR provisions as are allowed under the [Data Protection Act 2018](#) (in relation to crime and taxation, management forecasts, negotiations, confidential references and exam scripts and exam marks).

## Transfer of your information outside of the UK

When it is necessary for us to transfer your personal information across national boundaries to a third party data processor, such as one of our service providers, we will ensure this safeguards your personal information by requiring such transfers are made in compliance with all relevant data protection laws.

Provider	Purpose	Location	Lawful Transfer basis
Microsoft (MS Office 365, MS Forms)	IT infrastructure <a href="#">Microsoft privacy notice</a>	United States (with data hosted in the EU). If necessary they transfer the data to their sub-processors (see their sub-processor list <a href="#">here</a> )	Microsoft's data processing contract incorporating the EU Standard Contractual Clauses and ICO Addendum can be viewed <a href="#">here</a> . Further details about the safeguards it puts in place are <a href="#">here</a> .
Apogee Corporation Ltd	Online print and device and IT asset management DaaS provider. <a href="#">Apogee privacy notice</a> .	United Kingdom, Ireland and Germany	Adequacy decision
Diligent Corporation	For minuting and management of governance and committee meetings	United States	UK Extension to the EU-US Data Privacy Framework
DocuSign International (EMEA) Limited	Electronic signature tool	Ireland (although data residency is UK based personal data may be transferred within the DocuSign Group including DocuSign, Inc in the United States and to other sub-processors).	Adequacy (with intergroup or <a href="#">sub-processor</a> transfers governed by <a href="#">Binding Corporate Rules</a> <a href="#">Standard Contractual Clauses (and UK/ICO Addendum)</a> )
Flywire Inc (formerly WPM Education Ltd)	Payment processing. <a href="#">Flywire privacy notice</a>	United States	UK Extension to the EU-US Data Privacy Framework
Jotform, Ltd (part of Jotform Inc)	Form filling functionality <a href="#">Jotform privacy notice</a>	United States	UK addendum to the EU SCCs

			UK extension to the EU-US Data Privacy Framework
Monday Inc	Project and task tracking <a href="#">Monday.com privacy notice</a>	United States (Stored by Amazon Web Services)	UK Extension to the EU-US Data Privacy Framework
Panopto Inc	For recording lectures <a href="#">Panopto privacy notice</a>	United States	UK Extension to the EU-US Data Privacy Framework <a href="#">Panopto privacy notice</a>
Qualtrics*	Surveys <a href="#">Qualtrics data protection and privacy page</a>	United States and worldwide <a href="#">subprocessor list</a>	<a href="#">Standard Contractual Clauses</a> <a href="#">Qualtrics data protection and privacy page</a>
Unit 4 Group Holding BV Unit 4 Enterprise Resource Planning (formerly Agresso Business World)	Our central finance accounting system <a href="#">Unit 4 privacy notice</a>	The Netherlands	Adequacy decision <a href="#">Unit 4 privacy notice</a>
Western Union Payment Services GB Ltd (subsidiary of Western Union Holdings Inc)	Overseas payment processing Western union <a href="#">privacy notice</a>	United Kingdom and United States	Standard Contractual Clauses Western union <a href="#">privacy notice</a>
XN Leisure Systems Ltd (part of Jonas companies)	Sports centre membership management <a href="#">XN leisure privacy notice</a>	United Kingdom and United States	Standard Contractual Clauses <a href="#">XN leisure privacy notice</a>

Adequacy regulations made by the Secretary of State found here:

<https://www.gov.uk/government/publications/uk-approach-to-international-data-transfers/international-data-transfers-building-trust-delivering-growth-and-firing-up-innovation#uk-adequacy>

## How long your personal data will be kept

- We will keep your contact details for until the end of the work being carried out by your employer or business with which you are the named contact. However this may

be for a shorter period where you no longer are the named contact and we are provided with alternative business contact details.

- We usually keep details associated with our contracts and associated documents (which may include limited personal data) until the end of the contract + 6 years in line with the statutory limitation period.
- We keep emergency contact details on staff files (which are kept until the end of employment + 7 years)
- We will keep your contact details for as long as you wish to remain on the mailing lists/until you unsubscribe or contact us.

## Security

We will ensure that security measures are in place to prevent the accidental loss, unauthorised use or access to your data. Access is given to staff on a 'need to know' basis. Our staff are required to keep your data safe and complete data protection training.

We have procedures in place to deal with any data security incidents and will notify you and the ICO in the event of a data breach where we are required to do so.

## Your rights

Please be aware of the following rights which can be accessed free of charge by contacting [dataprotection@kent.ac.uk](mailto:dataprotection@kent.ac.uk):

- know how we are using your personal information and why (right to information)
- access the personal data held by us (subject access request)
- ask for correction of any mistakes (rectification)
- to object to direct marketing
- to complain to the Information Commissioner's Office (ICO), which is the UK data protection regulator

In some circumstances you also have the right to:

- object to how we are using your information
- ask us to delete information about you (the right to be forgotten)
- have your information transferred electronically
- object to automated decisions which significantly affect you
- restrict us from using your information.

For further guidance regarding your rights please see the [ICO website](#).

## Your rights- if you have given consent or explicit consent for a specific use of your personal data

You can withdraw your consent at any time. You can do this by contacting us at:

[dataprotection@kent.ac.uk](mailto:dataprotection@kent.ac.uk) (or clicking 'unsubscribe' in any email sent to you).

This does not affect the lawfulness of the processing based on consent before its withdrawal.

## Your right to complain to the Information Commissioner

You have the right to lodge a complaint with the [Information Commissioner's Office](#).

Their helpline telephone number is: 0303 123 1113.

## Contacts

If you have any questions or concerns about the way the University has used your data, or wish to exercise any of your rights, please consult our [website](#).

The University's Data Protection Officer can be contacted at: [dataprotection@kent.ac.uk](mailto:dataprotection@kent.ac.uk)

## Document review date

This privacy notice will be reviewed at least annually.

Version	Author	Description of Change	Date	Next Review date
1.0	ADP team	Initial Version of This Document	09/2025	09/2026