



The University of the West Indies

STUDENT PRIVACY STATEMENT

The University of the West Indies (“The UWI”, “University”) is committed to ensuring the privacy of your information. What you should expect when The UWI collects your information, is covered in this privacy statement.

1. For the purpose of this Statement:

“Personal Data” means data relating to a *living* individual or to an individual who has been [*deceased for less than thirty years,*] who is or can be identified, either from the data or from the data in conjunction with other information, which is in, or is likely to come into the possession of The UWI. It includes information in the form of photographs, audio and video recordings, and text messages.

Some Examples of Personal Data

- a) Information relating to the race, nationality or ethnic origin, religion, age or marital status of the individual;
- b) information relating to the education or the medical, criminal or employment history of the individual or information relating to the financial transactions in which the individual has been involved or which refers to the individual;
- c) any identifying number, symbol or other particular designed to identify the individual;
- d) the address and telephone contact number of the individual;
- e) the name of the individual where it appears with other personal information relating to the individual or where the disclosure of the name itself would reveal information about the individual;
- f) correspondence sent to an establishment by the individual that is explicitly or implicitly of a private or confidential nature, and any replies to such

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- correspondence which would reveal the contents of the original correspondence;
- g) the views and opinions of any other person about the individual; or
 - h) the fingerprints, deoxyribonucleic acid (DNA), blood type or the biometric characteristics of the individual.
2. This Statement explains how The UWI collects, uses and shares the Personal Data of its students and how the Personal Data will be processed in accordance with our Data Protection Policy.
 3. This Statement contains the practices to be followed by The University of the West Indies pertaining to the collection, use and disclosure of your Personal Data, whether you are a present or former University student.
 4. The University recognizes the confidential nature of the information in its care and is therefore accountable to you in protecting your Personal Data.

Who does this Statement apply to?

This Statement applies to all students of the University and forms part of your student UWI contract which governs relations between you and the UWI. Some of what is contained in this Statement will survive the expiry of your contract with us pertaining to your student membership.

What Is the Legal Basis for Processing your Personal Data?

Your Personal Data is collected and processed by the University as necessary for the performance of a contract under which we provide services to applicants and students. Some processing activities may also be carried out under a legal obligation (for example, disclosing Personal Data and Sensitive Personal Data to external parties based on University policy or statutory requirements), or where you have applied for a scholarship or financial aid, or where you have a medical emergency and your data is required to facilitate your receiving these services.

Your Personal Data is also collected and processed by the University where it is necessary to protect the vital interests of the student or another party (for example, disclosures to external parties to ensure the safety and wellbeing of individuals) and where it is necessary for the performance of a task carried out in the public interest or in the exercise of official

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authority (for example, collecting or disclosing information in order to meet regulatory or statutory requirements to which The UWI must comply).

What Personal Data we process and why

We process Personal Data such as:

- a) name;
- b) address;
- c) telephone numbers;
- d) email addresses;
- e) education and training records;
- f) employment information; and
- g) financial details

In addition, we process a special category of data referred to as Sensitive Personal Data which includes information such as:

- a) racial or ethnic origin;
- b) political opinions;
- c) religious or philosophical beliefs;
- d) student society or trade union membership.
- e) data concerning health;
- f) family and social circumstance;
- g) data concerning someone's sex life or sexual orientation;
- h) biometric data;
- i) disability data (whether regarding physical or mental health or specific learning styles).

We process Personal Data and Sensitive Personal Data as part of our recruitment exercise. That means in order for The University to consider an application or respond to a request or inquiry certain information may be required. Your information forms part of your personal file and part of your contract with the University. The University also has a statutory obligation to report data on its activities to the various accreditation bodies within the Caribbean countries where the UWI is established and to our Contributing governments.

Other reasons for processing your Personal Data and Sensitive Personal Data include:

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- a) Admissions (including for filtering purposes to ensure the information we send is relevant to you).
- b) Provision of academic services in relation to your degree programme, such as
- student registration;
 - management of assessment (including examinations);
 - management of academic progression (including mitigating circumstances);
 - monitoring of attendance;
 - investigations into academic misconduct;
 - investigation into student misconduct;
 - graduation;
 - certification;
 - provision of references;
 - maintenance of student records.
- c) Financial assessments (e.g. fee status assessments, eligibility for bursaries and scholarships etc.).
- d) Non-academic functions, such as
- providing student support services (e.g. Welfare, Careers Development Service, Counseling and Wellbeing, and Personal Tutoring);
 - providing library and IT services;
 - safeguarding and promoting student welfare;
 - monitoring equality of opportunity and eliminating unlawful discrimination;
 - ensuring safety and security;
 - managing accommodation and other ancillary services (e.g. student ID cards);
 - car parking;
 - financial administration (e.g. tuition fees, scholarships, bursaries, student hardship etc.);
 - statutory reporting Government Institutions where applicable;
 - managing access to buildings and resources, including online resources;

- submission, publication and permanent preservation of PhD theses in line with legal requirement/copyright transfer agreements.
- e) We may also use your data for other administrative purposes, such as
 - to undertake statistical analysis, carry out compliance audits, promote services, detect or prevent crime, and to deal with grievances, disciplinary action, complaints or enquiries.
- f) In some cases we may undertake automated decision-making using personal data in our recruitment and admissions processes.

How will we use your Personal Data?

Information provided by you is ordinarily used solely for the purpose for which it was collected unless you have been informed of any other legitimate use and you have consented to that use.

Some examples of what your information is used for include:

- providing you with services (e.g. healthcare, housing, educational delivery);
- providing you with specific information (e.g. course brochures or prospectuses) and general information that the UWI may wish to communicate with you from time to time. We use several channels, including our Campus Messaging Services, to communicate with you.

Will we be sharing your Personal Data with anyone?

We will use Personal Data and Sensitive Personal Data to administer your degree programme, or other programme of study or engagement. And where your programme requires collaboration between The UWI and an external entity, including another university, your information will be shared with that entity. In such instances, you will be told beforehand. Examples where your information will be shared with external entities are:

- Student exchanges pursuant an arrangement (MOU) between The UWI and another university or institution).
- For medical students, the University will share your information with a teaching hospital to which you may be assigned as part of your medical degree programme.

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- For students whose professional accreditation may require assignment to professional bodies as part of their programme of study, the University will share your information with such intuitions.

Please ensure that when you enlist in a programme of study, you inquire whether your programme is connected with any other non-UWI body to which you may be assigned for the completion of your programme.

Your Personal Data may also be shared with:

- Departmental staff;
- Providers of student accommodation;
- Software providers (e.g. plagiarism detection services, auditors, etc.);
- The Guild of Students;
- Students Loans Companies;
- Financial Institutions holding students and university accounts;
- Ministries of Education and their agents throughout the region;
- Ministries of Finance and their agents throughout the region;
- Professional and regulatory bodies in relation to the accreditation of our programmes, confirmation of qualifications and professional registration (e.g. University Council of Jamaica);
- Government departments or agencies where the University has a statutory obligation to provide information (e.g. the Office for Immigration and Passport Services);
- Agencies involved in the prevention and detection of crime (e.g. the Police);
- Parents, guardians and next of kin (where there is a legitimate reason for disclosure).

You have a choice about whether you want to receive information about the University, our progress or fundraising activities, and how we communicate with you concerning these and similar matters. You can change your marketing and contact preferences at any time as long as the change does not compromise the records we hold for you for our legal and other statutory purposes.

We will not use your personal information for marketing purposes if you have indicated to us that you do not wish to be contacted in this way. You can change your marketing and contact preferences at any time by contacting your DPO.

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The University is committed to holding your Personal Data securely and treating it with sensitivity. Any transfers of your Personal Data to any third party affiliate are protected either by contracts and undertakings between The UWI and these third part affiliates.

Sharing Data with the Alumni Association

All students become members of the University's Alumni Association upon graduation. Your personal data is passed on to the Alumni Office unless you specifically request that the University does not pass on your information.

Upon graduating you are granting automatic permission to the University to share your information with the UWI Alumni Association (UWIAA). The Alumni Relations arm of the Institutional Advancement Division (IAD) implements programmes to encourage communication among alumni for personal and professional networking and university related activities.

The IAD is committed to ensuring the privacy of Personal Data. The IAD may share Personal Data gathered from its sites with others outside the IAD and/or the University, when:

- authorized by law;
- permitted under general UWI policies;
- authorized by an approved IAD contract;
- it is clearly stated at the ALUMNI Online site that such information will be shared and the user indicates consent by providing the information;
- consent is otherwise given, or authorized for good cause by the Chancellor or Vice Chancellor of The University of the West Indies.

What if I do not want my Personal Data to be shared?

Students are given the opportunity to opt-out of **some** data sharing arrangements, but we encourage students to think carefully about the impact of doing so.

If you wish to restrict data processing or sharing including use for marketing or do not want to be contacted by the University in any way, please inform us. You can request that we remove your details from our database by contacting the University Data Protection Officer (dpo@uwi.edu).

Where an opt-out is not in place, we will disclose relevant Personal Data to third parties, including: our employees, partners, agents and contractors, where there is a legitimate reason for sharing your information.

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Who will have access to your Personal Data?

Information is utilized by various sections of the University as is necessary and proportionate for our operational purposes. In the course of their normal and reasonable duties, only designated University personnel will have access to your Personal Data.

How do we get your information?

The information (Personal Data and Sensitive Personal Data) is collected electronically, online (e.g. application forms, questionnaires, complaints made by you) and manually. Information is obtained directly from you (the student or applicant) and, in some cases, from a third party organisation. An example of us obtaining your information from a third party is during recruitment where recruitment agents engaged by The UWI obtain your information. Other examples include us obtaining your Personal Data from scholarship donors, financial institutions including specialized student loan bureaus, health insurance and other insurance entities.

The UWI has a personal file for each student. Files may be in digital or physical forms. The information on your file includes your Personal Data. Sensitive Personal Data is kept in confidential files. Personal Data provided as part of any online application process for an employment opportunity shall be processed so as to allow us to process and evaluate the merits of that application in accordance with our legitimate interests.

Your personal file will also have other information that you have provided for example in the case of formal complaints, request for information under UWI regulations, and disciplinary matters. The UWI may, in certain circumstances, remove certain information if you so request but only where the removal of that information will not compromise the University's legal obligations and where the information will not compromise another person's ability to rely on that information (for example in case of disciplinary matters); or where the information is required for The UWI to retain its status as an accredited Higher Educational Institution.

For how long do we keep your Personal Data?

For existing and former students, Personal Data relating to your academic achievements will be retained indefinitely. Other Personal Data will be held to enable us to contact and engage with you for as long as it is necessary for the above purposes in accordance with the University's legal purposes.

How can I raise concerns about the processing of my Personal Data?

For purposes of the protection of your Personal Data, The University has engaged a **Data Protection Officer**. If you have any feedback or concerns in relation to the processing of your Personal Data, please contact the Data Protection Officer at dpo@uwi.edu.

Graduation and Degree Information

Your Personal Data (including degree award) will be published in the graduation programme and online for your graduation ceremony. We also share information relating to the graduation ceremony with third parties, including photographers and videographers, involved in the ceremonies. Our engagements with these third parties include the same standard of protection of your personal data as our commitment to you.

Graduation ceremonies are streamed live on the internet and are made available online thereafter. Personalized captioned clips of each graduate are made available online by UWITV and their partners. You can request that your identification be removed from screen display before, or after, the live streaming.

The UWI reserves the right to use footage from graduation ceremonies for media publications and advertising. All graduands and guests should be aware that they may be featured in footage of the degree ceremony. By registering to take part in your graduation ceremony and by requesting guest tickets, you are giving permission for your image to be recorded and used by The UWI.

Viewing and Maintaining Personal Data

Our current students are able to view and maintain personal data via our online Student Administration System. Please advise us promptly of any changes to your details. If you have any questions about the data we hold please contact the DPO for your campus.

IP Addresses and Cookies

Information about your computer including login information, such as your machine's IP address, operating system and browser type, may be collected automatically by the server and used for system administration and statistical purposes only. This is statistical data about the browsing actions and patterns of users of The UWI's website, and does not identify any individual.

Cookies may also be used to collect user data to enhance your experience of a UWI website.

What are my rights and how can I enforce them?

1. The right to be informed about which Personal Data is collected and how it will be used.
2. The right to request access to your Personal Data held by the University
3. The right to have incomplete or inaccurate Personal Data rectified (corrected).
4. The right to restrict the processing of Personal Data – students have the right to block the processing of their Personal Data by the University in specific situations
5. The right to data portability – students have the right to request provision of some elements of their Personal Data in digital form in order to provide it to other organisations.

In the first instance, please contact the DPO (dpo@uwi.edu).