

I. Introduction

As part of the University of Exeter, Retail and Catering ("Our", "Us", "We") is a data controller and is committed to protecting your personal data and working in accordance with all relevant data protection legislation. It is necessary for **us** to collect and process your data in order for **us** to fulfil **our** contract with you and deliver the products and services you have purchased from **us** (if you are a customer), or that **we** have purchased from you (if you are an external provider). Dependent upon your consent, we may also provide you with information about our products and services. This Privacy Notice explains exactly how **we** process and use the data **we** collect.

2. What data do we hold?

We hold the personally identifiable information, such as the name, title, email address, home or work address and telephone number of **our** customers and external providers under contract to **us**. Where it has a direct bearing on booking requirements, **we** may also request other information pertaining to personal health and dietary preferences. We only hold the minimum amount of data necessary.

We carry out market research activities (data capture competitions, face-to-face data capture, focus groups), through which we may capture personally identifiable information.

We also carry out customer research by providing customers with access to feedback questionnaires. Although this feedback is anonymous, the questionnaires provide the opportunity for free text comments, in which a customer may supply personally identifiable information about themselves, other customers or members of staff.

There is also information about your computer hardware and software that may be automatically collected when you visit our Eat & Shop webpages (www.exeter.ac.uk/campusservices/ eatandshop/), our Fresh Ideas webpages (www.exeter.ac.uk/ campusservices/freshideas/), and **our** social media webpages. This information is held by the University of Exeter and relevant third party social media companies, and is accessible to **us**. It can include: your IP address, domain names and access times. These sites use "cookies" to help you personalise your online experience. You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer.

3. How do we use your data?

We process your data to enable **us** to carry out **our** activities in accordance with **our** objectives, and for **our** administrative purposes to enable **us** to fulfil **our** contractual obligations to you.

Primarily **we** use your data to deliver the products and services that you have requested or purchased from **us**. Dependent upon your prior consent, We also use your personally identifiable information to provide you with more information about **our** products services.

We may also publish, with your consent, your personally identifiable information on **our** Eat & Shop webpages (www. exeter.ac.uk/campusservices/eatandshop/), or **our** social media webpages. This may be in the form of customer testimonials, sounds, images and/or video.

Some of the personal data collected through **our** customer feedback channels may be used as evidence that we have not fulfilled **our** contract with you. However, the majority of personal data contained in customer feedback will be processed on the basis that it is in **our** legitimate interest to do so. This means that it is in **our** and your interest to ensure that **we** are delivering a service that meets your expectations. Processing customer feedback allows **us**, therefore, to continually improve the products and services we offer.

Any personal data collected through market research activities is used to help **us** gain a better understanding of **our** existing customers, and make more informed decisions regarding the products and services **we** offer.

External Providers

Any data held by **us** is in the form of Contracts, Terms and Conditions and Service Level Agreements agreed upon and signed by you and Retail and Catering.



4. How will we share your data?

We ensure that appropriate data sharing agreements are in place prior to sharing your personal data.

Customers

Where relevant, **we** may share data with other University of Exeter internal providers involved in the delivery of products or services you have purchased from **us**. If you are an internal customer, your data will also be shared with the University of Exeter's Finance Services, who will hold it for invoicing purposes.

Where customers pay by debit or credit card using a payment terminal, personal and financial data is transmitted to the Merchant responsible for processing payments, Realex Ltd, and a limited amount of data (name, payment reference, amount paid and the last four digits of you card number) is held by University of Exeter Finance Services.

We may also share your personal data with relevant external providers under contract to the University of Exeter, where it is directly related to the delivery of products or services you have purchased from **us**. Ordinarily, this data will be used by these external providers solely for the purpose of delivering the products and services you have purchased. However, an external provider may wish to use your data for other purposes, such as direct marketing. If this is the case, either the University of Exeter or the external provider in question will seek your explicit consent beforehand.

Personal data received from customer feedback will only be shared with those internal and external providers to which the feedback is directly relevant.

External Providers

Where relevant, We may share data with other University of Exeter internal providers involved in the delivery of **our** products and services. With regard to Contracts, Terms and Conditions and Service Level Agreements, your data may be shared with the University of Exeter Legal Services Office to ensure the legality of such documents. You will also be contacted directly by the University of Exeter's Finance Services, who hold personal data for invoicing purposes.

5. How do we protect your data?

We use the Kinetic Solutions Management Database system to store and organise **our** customer data, which is held securely on the University of Exeter's servers. All staff who access the database have completed the University of Exeter's data protection training. Only customer details are accessible to staff. No payment details are accessible.

Archived paper documents are held securely on University of Exeter premises for the duration of **our** retention schedule, before being disposed of as confidential waste.

Our credit and debit card payment merchant, Realex Ltd, is compliant with the Payment Card Industry Data Security Standard (PCI DSS). To find out more about PCI Compliance, visit: www.pcisecuritystandards.org

Our customer feedback surveys are created using software supplied by Bristol Online Surveys (OS), Customer Research Technologies (CRT) Ltd, Service Monitor Ltd and Snap Surveys Ltd. All survey data is held on the secure servers of these third parties.

Any personal data gathered through market research activities (data capture competitions, face-to-face data capture, focus groups) is held securely on the University of Exeter's servers.

Any personal data used as part of ongoing marketing and publicity campaigns on our social media webpages is held on the secure servers of these third parties. These include: Facebook, Google+, Instagram, Pinterest, Twitter and Youtube pages.

6. How long do we keep your data?

We retain customer data for six years after the year it is collected, in order to comply with the University of Exeter's retention policies and with the Limitation Act 1980. After this period, all customer data is deleted or anonymised. For more information on the University of Exeter's data retention schedules, visit www.exeter.ac.uk/ig/records/guidance/



7. Your rights and preferences

If you no longer wish to receive communications by post, telephone or email, please contact csmarketing@exeter.ac.uk, specifying which communication channels you wish to unsubscribe from, or click on the unsubscribe link in any of **our** communications.

This Privacy Notice will be kept under review. Any changes will be updated on our website and communicated to you as appropriate. This Privacy Notice was last updated in April 2018.

You have the right to:

- ask us to see, correct or delete the data we hold about you
- object to specific data uses, as described above
- object to receiving communications and direct marketing.

8. Further Information

The University of Exeter's Data Protection Officer is responsible for monitoring compliance with relevant legislation in relation to personal data and can be contacted at dataprotection@exeter. ac.uk. You can also contact the DPO if you have any queries or concerns about Event Exeter's processing of your personal data. You have the right to lodge a complaint with the Information Commissioner's Office at www.ico.org.uk/concerns.