

Advance HE Privacy Notice Advance HE Connect

About This Notice

This Privacy Notice outlines the personal data that will be collected from or about an individual for the purpose of Advance HE Connect platform.

The Notice will set out why Advance HE will collect, use, and protect an individual's personal data, and the rights an individual has over their data.

This Notice covers our requirement under the Data Protection legislation applicable in the UK (GDPR UK) to notify individuals of the information contained in this statement.

Advance HE Role

For the purposes of the Data Protection Act 2018, Advance HE is the Data Controller, and is responsible for the personal data that will be processed, this means we are responsible for deciding how we collect, use and store information about an individual or generate about them.

Advance HE is a company limited by guarantee incorporated in England and Wales under company number 4931031 and registered as a charity in England under charity number 1101607 and in Scotland under charity number SC043946, with its registered office at Innovation Way, York Science Park, York, YO10 5BR.

Advance HE is registered with the Information Commissioner's Office (ICO) under registration number Z8550188.

Advance HE Contact Details (Data Controller)

Field	General Contact	Data Protection Officer
Name:	Networks Team	Becky Tasker
Address:	IC 1.25 Innovation Centre, Innovation Way, York Science Park, York, YO10 5DG	IC 1.25 Innovation Centre, Innovation Way, York Science Park, York, YO10 5DG
Email Address:	networks@advance-he.ac.uk	Data.protection@advance-he.ac.uk
Phone Number:		+4420 3870 6011

Type of Personal Information We Will Collect

For the purposes of the Connect platform, Advance HE will collect the following information:

- Full name
- Contact details, including email address and telephone number

- Employment information
- Picture
- Links to professional networks, such as LinkedIn and X.
- Any personal information made within the Community Space, including closed groups, statements, assessment, surveys, feedback forms, questions, items or comments and content uploaded to the Community Space.
- Login information and security questions / answers
- Automatically logged information by computer servers in the browser, such as IP address and date / time of visit.
- Factual information to support with queries or communication with Advance HE.

How We Collect the Personal Information and Why We Have It

The personal information will be collected **directly** through:

- The individuals will provide their personal data when creating an account and interacting with their profile and the content of Connect.

The personal information will be collected **indirectly** through:

- Cookies and tracking on the Advance HE website. For further information, please visit our [Cookie Policy](#).

When an individual first visits Advance HE's website, they will be presented with a cookie banner which allows them to make an informed choice about which types of cookies to accept on their device. They can opt out of tracking at any time by using a private browsing mode.

When the individual interacts with Advance HE, we may keep a record of this information on our systems and use it to determine an individual's interest. We automatically generate data from certain interactions which allows us to tailor communications so that they are relevant to an individual and assist them in accessing the information and products that interest them. In addition, if an individual has consented to tracking cookies, some of their past browsing history on our site will also be available to help us more effectively engage with the individual.

Advance HE will also use these sources to improve our site, services and products and assess our marketing performance.

Advance HE collects this personal information for the following purposes:

- To provide individuals with access to the Community Space.
- For Advance HE to generally contact individuals to provide services.
- Marketing purposes, as per marketing preferences.
- To allow individuals to correspond with Advance HE and other users in the Community Space.
- To allow individuals to participate in closed groups.
- To allow individuals to manage and update their own privacy settings, which identifies the information that other users can see.
- Applying and enforcing Advance HE standards, including this Privacy Notice and the Terms of Use.
- Providing updates to individuals on any updates to these standards.

- To fulfil the obligations to Advance HE member institutions, such as providing reports outlining their employees using Connect and other users they interact with.
- Meeting legal obligations including those owed to Advance HE regulators.
- Administration purposes including establishing, amending, closing or renewing use accounts.
- To deal with complaints or queries relating to the user of the Connect platform.
- To better understand how users access the Connect platform, both on an aggregate basis and individual basis, in order to improve the Connect platform and respond to users' desires and preferences.
- Generate reports for internal use by Advance HE as part of services for institutions.
- To support Chair of Networks with the administration of their duties.

Lawful Basis

Advance HE are only about to use and individual's data when the law allows us to do so. This is called lawful basis. The lawful basis Advance HE will rely on to use an individual's data for the Connect platform is as follows:

- Contract – when individual signs up to the Connect platform, they are required to agree to a Terms of Use.
- Recognised Legitimate Interest – Advance HE may share personal data to the Chair of Networks which are formed on Connect to support in the administration of duties. The personal data that will be shared will be limited to that which is publicly available on the Connect platform.

Third Party Use of Data

The following identifies any third-parties who Advance HE share the personal data with:

Third Party Provider	Purpose	Privacy Notice
Microsoft	To deliver the services and security of data.	Microsoft privacy notice
Hivebrite	To store, protect and process the data.	Hivebrite privacy notice
Users employers	To provide reports and information on the use of the Connect platform, as per the requirements of the membership contracts.	
Other Users	Users have the option to publicly share personal data with other users of the platform.	
Chair of Networks	Chairs of Networks in which users are members of will utilise personal data to support their work as Chair, i.e. for meeting invitations.	

As with most organisations, Advance HE uses service providers to support in delivering our services and keep an individual's data secure. When we use these services providers, it is necessary for us to share an individual's personal data with them.

Advance HE will ensure that the correct agreements are in place with all of our providers that ensures they are obliged to protect an individual's data.

Cloud service providers used to store, process, and protect Advance HE data will provide the relevant certification, security, and encryption to support the organisation. Any cloud service provider cannot under any contractual arrangement use, process, or store any Advance HE personal information without the express permission of Advance HE. Breach notification obligations and protocols will be included in any data arrangement with cloud providers and notifications on any data breach reported to Advance HE immediately. In the case of any data breach, Advance HE will work with the cloud provider to ensure data is secured and relevant

parties informed of the data breach immediately. Any cloud providers chosen by Advance HE will demonstrate compliance through data protection impact assessments and by being ISP 27001 and ISO 27018 compliant.

Each third-party contract ensures ongoing security protocols for collecting and sharing personal and special category data with auditing measures in place. Upon expiry of a third-party contract, the contractor is obliged to cease processing the data, to destroy or return any copies of data they hold on our behalf, and we block further access to our systems.

How We Store Personal Information

Advance HE will only retain personal data for as long as necessary to fulfil the purposes of which it is collected, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which we process individuals' personal data and whether we can achieve those purposes through other means, and the applicable legal or regulatory requirements.

In some circumstances Advance HE may anonymise individuals' personal data, so that it can no longer be associated with the individual, for research or statistical purposes in which case we may use this information indefinitely without further notice to the individual.

Where personal data is held electronically by Advance HE, it is held on a computer system that is owned and controlled by us, or such other third party appointed by us.

When Advance HE stores details in a paper format, they are held securely and locally at our offices by staff and contractors. Sometimes, Advance HE will make electronic copies by scanning or typing up the information from paper documents, which are then stored on our computer system.

It is the responsibility of the individual to keep their any passwords that may be used to access Advance HE sites and services, confidential. Individuals should not share passwords with anyone.

Transference of Personal Data

International Transfers

In some circumstances the data that Advance HE collects from an individual may be transferred to, and stored at, a destination outside the European Economic Area ('EEA').

It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers, for purposes including, but not limited to, the fulfilment of an order, the processing of payment details and the provision of support services.

An individual submitting their personal data, agrees to this transference, storage, or processing.

Advance HE complies with the applicable data protection laws and takes all steps reasonably necessary to ensure that their data is treated securely and in accordance with this Privacy Notice.

Where data is transferred outside of the UK, Advance HE makes sure that the individuals' data is given the same level of protection, either because that country has a comparable data protection standard (Adequacy), or by using another safeguard such as an enhanced contractual agreement (IDTA).

Legal Obligations

Sometimes, we may be legally obliged to supply copies of personal information to other organisations, for example to supply information to the Police. Advance HE may not be able to always inform the individual in this way, however we will ensure this is only shared in accordance with the law.

Links to Other Websites

Connect may contain links to other websites, if an individual follows these links they must note that these websites will have their own Privacy Notices and Advance HE does not accept any responsibility or liability for their use of any personal information that is submitted to them.

Individuals Data Protection Rights

Under the Data Protection Law, an individual has the following rights:

- Right to Access – individuals have the right to request us for copies of the information that we hold about them.
- Right to Rectification – individuals have the right to ask us to rectify personal information you think is inaccurate. Individuals have the right to ask us to complete information they think is incomplete.
- Right to Erasure – individuals have the right to ask us to dispose of all personal information that is held under certain circumstances.
- Right to Restriction of Processing – individuals have the right to ask us to restrict the processing of their personal information in certain circumstances.
- Right to Object to Processing – individuals have the right to object to the processing of their personal information in certain circumstances.
- Right to Data Portability – individuals have the right to ask that we transfer their personal information that has been given to use to another organisation, or to themselves, in certain circumstances.

Individuals will not be charged for exercising their rights, only under certain circumstances may an administrative fee be requested.

If individuals wish to make a data subject request, we will aim to respond within one calendar month once individual's identification has been confirmed. Advance HE reserves the right to

extend the response time by two calendar months if required, the individual will be notified accordingly.

Please contact us at data.protection@advance-he.ac.uk if you wish to make a request.

Making a Data Protection Complaint

If individuals are unhappy with any aspect of this Privacy Notice, or how their personal data is being processed, please contact our Data Protection Officer at data.protection@advance-he.ac.uk.

If individuals are still not happy, they have the right to lodge a complaint with the ICO:

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Appendix A: Child Safety Standards Policy

Advance HE does not actively provide any services to Children, under the age of 18 or under the age of 13, and therefore does not allow any children under the age of 18 access to the Connect platform.

However, Advance HE is aware that this is an application with allows for open and closed sharing of content and therefore is committed to ensure that the Connect platform is compliant with all relevant children related laws and regulations, such as the Children Act 1989 / 2004, the Children and Social Work Act and the Age Appropriate Design Code, within the UK, and any other relevant law or regulation that may come into force from time to time. Specifically, Advance HE will be committed to preventing online child sexual abuse and exploitation.

To ensure that there are no under 18s, or under the age of 13, individuals creating a profile on Advance HE Connect, Advance HE implements a tick box system on the registration page with the following statement:

"I give consent to Advance HE Connect to use this information to build a profile when my request is approved, regulate access to the platform. I confirm I am over 18 at the time of request to join."

Advance HE Compliance and Users Requirements

Advance HE strongly prohibits any explicit content or child sexual abuse and exploitations on the Connect application.

The Connect application will comply with the applicable child safety laws and regulations and ensures that all content shared within the application is appropriate for a mixed audience, including children.

Individuals who are using the Connect platform and are creating content, are actively monitored and moderated by Advance HE to prevent inappropriate material such as harmful, abusive, or inappropriate content from being shared to, accessible by or viewed by children.

Any content that has been created which is proven or perceived to fall under Child Safety Abuse Material, including, but not limited to, any visual depiction (photos, videos or computer generated imagery) involving the use of a minor engaging in sexually explicit conduct, will be automatically removed and reported through the Advance HE [Safeguarding and Protecting People Policy](#).

Should the content be proven to be Child Safety Abuse Material, Advance HE will report this content to the [National Centre for Missing & Exploited Children Cyber Tipline](#).

In the event that a user of the Connect platform has become aware of proven or perceived Child Sexual Abuse Materials which have not be automatically flagged and removed from the application, they will be required to report this content to the Compliance Team via compliance@advance-he.ac.uk.

Privacy, Advertisements and Monetisation

Advance HE does not actively collect children under the age of 13's personal data, however Advance HE is committed to ensuring any personal data submitted on the platform, which may include information on a minor under 13, will be protected in accordance with the Data Protection Act 2018.

Under the Age Appropriate Design Code, Advance HE is committed to safeguarding children's privacy by data minimisation in order to ensure that no unnecessary data collection of children's data is happening, and by ensuring any potential collected children's data is securely stored and not shared unnecessarily. Advance HE is committed to processing children's data with extra care and ensures such data is handled responsibly. Where possible, Advance HE shall allow parents to monitor their children's activities or restrict certain actions and activities online.

Advance HE does not offer advertising or monetised content on the Connect platform.