

# Graduation Privacy Notice

University of Wales Trinity Saint David (UWTSD) is the data controller and is committed to protecting the rights of students and graduates in line with the UK Data Protection Act 2018 (DPA) and the new General Data Protection Regulation (GDPR). UWTSD has a Data Protection Officer who can be contacted through [foi@uwtsd.ac.uk](mailto:foi@uwtsd.ac.uk)

This statement explains how the University handles and uses your personal information during the graduation process. This applies to all students who are intending to graduate or may be eligible for an award whether they attend a ceremony or not. The University is committed to protecting your information and being transparent about what information it holds. The University has a data protection policy in place which can be found at <https://www.uwtsd.ac.uk/about/governance-and-management/corporate-governance/data-protection>

## What information do we collect about you?

UWTSD collects and records the following personal information through the graduation process:

- Contact details, collected from your student record
- Course details and award completed, collected from your student record
- Access requirements for graduates and guests, collected from the online Graduation Booking process or by email exchange or telephone conversation. This information is recorded and stored in the UWTSD student records system and managed in accordance with the Student Privacy Notice (LINK).
- Your image via a live streaming link and photographs, collected on the day of the ceremony. Your guests may also be captured on camera or film.

## How will your information be used?

This information is collected for the following purpose:

- **Administration and planning of the ceremony**  
We need your personal information to carry out the necessary administration relating to your graduation ceremony.
- **Organising access requirements for graduates and guests**  
Graduates are asked to disclose any disabilities or medical needs for themselves and their guests, which require access arrangements to be made for the ceremony.
- **To provide a graduation brochure**  
The University includes the names of each graduate and the award attained in its graduation brochure which is available online via the UWTSD website. The University publishes this brochure as a commemoration of the day and a celebration of achievement for the

individuals concerned. It is considered that inclusion of the individuals name on the brochure enhances the graduation experience. No information on the classification of the award attained is included and it is not considered that the inclusion of names of graduates will result in any unwarranted harm or distress.

If you do not wish for details (name and course) to be included in the brochure please contact the [graduation team](#) no later than 2 weeks prior to your ceremony.

- **As part of the live streaming link available on the internet**  
Ceremonies are streamed simultaneously on the internet to allow those not able to attend to view the proceedings. The University appreciates that it is not possible for all family and friends to attend and by streaming the event on the University's web it enables others to see the ceremony. Individuals are advised in communication relating to the event that the ceremony will be available online. It is considered that filming the ceremony enhances the experience for graduates, their family and friends and the University. If you do not want to be included in this broadcast, please contact the [graduation team](#), no later than 2 weeks prior to the ceremony to discuss potential options.
- **Photographs of the event**  
UWTSD use an official photographer to take photographs of the graduation ceremonies. These images may be used for media publications and advertising. If you do not want your image to be captured in this way, please contact the [graduation team](#), as soon as possible.
- **Providing an alumni service**  
When you complete and pass your course, you automatically become a UWTSD alumnus and will be provided with information about the University's Alumni Network and the benefits associated with being a member. When you complete your graduation booking form, we will use the information on your form to update your contact details in our alumni system.

## **Legal basis for processing your information**

Article 6(1)(a) and Article 9(2)(a), which allow us to process personal data where you provide your consent. If you provide information to us about any disabilities, medical needs or other health data to request any special arrangements during the ceremony, you are consenting to us using that information to make reasonable adjustments. If you are a graduate you must ensure you have the consent of your guests to provide any similar information relating to them.

Article 6(1)(c), Once we have taken action to make any reasonable adjustments, we will rely on Article 6(1)(c), Article 9(2)(g) UK GDPR and Schedule 1(6) DPA to retain information to demonstrate how we have acted on your request, to comply with equality legislation. which allows us to process personal data when it is necessary to comply with a legal obligation. We are legally required to process some information for the purposes of complying with equality and health and safety laws.

Article 6(1)(f), which allows us to process personal data where it is in our, or someone else's, legitimate interests to do so and it does not unduly prejudice your rights and freedoms.

We rely on this condition to, among other things:

- Administer, record and publish the ceremonies. It is in our and our students' and graduates' interests to offer and run graduation ceremonies to celebrate our graduates' successes.
- Deliver some services and facilities to you such as part of the Alumni community, and ensure the Alumni Team holds up-to-date contact details for graduates. It is in the interests of you, our graduate, to have access to all the advice, services and networks provided by our Alumni Team to help you plan for your future, and to be provided with other beneficial services as part of your University experience.

## **Who receives your information?**

Personal information will be processed by staff within UWTSD for the purpose of the graduation ceremony. Your name and course will be displayed in the graduation brochure that will be available on the UWTSD website, unless you inform the [graduation team](#) of your objection. Any other disclosures that UWTSD makes will only be in accordance with Data Protection Legislation.

## **How long will your information be held?**

UWTSD will retain your personal information (including the graduation event video) in line with the University Records Retention Policy.

After graduation the University will need to maintain some records in order that it can verify awards, provide transcripts of marks, to provide academic references for career support. and maintain accurate contact details for the Graduate Outcomes Survey.

## **Security of your information**

Data Protection legislation requires us to keep your information secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised access and disclosure. Only members of staff who need access to relevant parts or all of your information will be authorised to do so. Information about you in electronic form will be subject to password and other security restrictions, while paper files will be stored in secure areas with controlled access. Some processing may be undertaken on the University's behalf by an organisation contracted for that purpose. Organisations processing personal data on the University's behalf will be bound by an obligation to process personal data in accordance with Data Protection legislation.

## **What are your rights?**

You have a right to access your personal information, to object to the processing of your personal information, to rectify, to erase, to restrict and to port your personal information. If you have provided consent to UWTSD to process any of your data then you also have a right to withdraw that consent. Any requests or objections should be made in writing to the University Data Protection Officer: Data Protection Officer University of Wales Trinity Saint David, Technium 1, Kings Road, Swansea, SA1 8PH. Email: [foi@uwtsd.ac.uk](mailto:foi@uwtsd.ac.uk) Tel: 01792 481000

## **How to make a complaint**

If you are unhappy with the way in which your personal information has been processed you may in the first instance contact the University Data Protection Officer using the contact details above. If you remain dissatisfied then you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: - Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF Website: [www.ico.org.uk](http://www.ico.org.uk)

## **Your responsibilities**

You are required to read this Privacy Notice so you understand how we use your personal information and your rights. You also have a responsibility to keep the details used for graduation arrangements up-to-date during the graduation process.