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Summary

The University needs to collect and process personal data in order to answer enquiries, provide services, manage its operations effectively, and meet legal requirements. This document sets out how we use your personal data.

This document will be updated from time to time in order to ensure compliance with data protection legislation.

This is a new policy, expanding the information available at <http://www.open.ac.uk/privacy>

Scope

What this document covers

- Enquirers and OU registered users

What this document does not cover

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If you use OpenLearn, please see [OpenLearn's privacy statement](#)

If you have ever registered or enrolled to study with The Open University, please see the [Students privacy notice](#).

Policy

1. Who we are

- 1.1 The Open University is the data controller in relation to the processing activities described below. This means that The Open University decides why and how your personal information is processed.
- 1.2 Where this policy refers to “we”, “our” or “us” below, unless it mentions otherwise, it is referring to The Open University.

2. What information do we collect about you, and how do we collect it?

Personal information you give to us:

- 2.1 As soon as you contact us or speak to an adviser either via phone or at an event or download a report through digital marketing/social media we create a record in your name. To that record we add information that you give us whenever you contact us. We are likely to hold your name and contact details, details of enquiries you have made, and your area of interests.
- 2.2 If you or your colleagues become a student, then we add the information you give us when you register and throughout your studies to this record. For more information, see the [Student privacy notice](#).

We may automatically collect the following information

- 2.3 If you have registered with us, we will add to your record any activities that you carry out on our website. This might include diagnostic quizzes or contact forms you complete. We may also automatically collect technical information when you browse our websites. Further information about this is given in our [privacy and cookies policy](#).
- 2.4 We will contact you via email marketing communications that will be sent to your work email address about latest L&D trends and research as well as product information which we record if you open them.
- 2.5 We record telephone calls and monitor other communications between you and the University to make sure that we have carried out your instructions correctly and to help us improve our services through staff training.

Personal information we may receive from other sources

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- 2.6 We may enhance our enquirer records with data received from third parties, in order to ensure we have up to date contact details for you, and in order to offer you more relevant communications.
- 2.7 We may receive your contact details when you have requested an OU publication via a 3rd party site such as the BBC (e.g. poster) or FaceBook (e.g. prospectus)
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3. How do we use your personal information?

Where the activity relates to our public task of delivering Higher Education qualifications, and promoting the educational wellbeing of the community

- 3.1 We will use and process your personal information to provide our services, activities and online content, to provide you with information about them, and to deal with your requests and enquiries.

Where the activity is in our legitimate interests

- 3.2 Our legitimate interests are to provide and improve our services, to manage our operations efficiently, and to increase our student numbers

We will contact you via email marketing communications that will be sent to your work email address about latest L&D trends and research as well as product information which we record if you open them:

- To give you relevant information about our services
 - To analyse our enquirers to inform our marketing strategy, and to enhance and personalise your customer experience
 - To identify others like you who would may be interested in our products
 - To verify the accuracy of data that we hold about you and create a better understanding of you as a customer
 - To maintain network and information security
 - For testing and maintaining our systems
 - To help us improve our services via staff training
 - We may ask you to take part in specific research activities to either help us plan and improve our services, or for academic research purposes. We might contact you ourselves or ask outside research agencies to do so on our behalf
 - To assess and improve our service to customers through recordings of any calls
 - To manage complaints.
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4. Who do we share your information with?

Our suppliers and service providers

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- 4.1 We use third party suppliers and service providers for a number of activities, from sending bulk text messages and providing IT systems and conducting market research. We also use third parties to identify audiences for advertising: we may temporarily transfer an encrypted version of your email address to social media platforms in order to identify a target audience with the same interests as you. This target audience would receive targeted advertising delivered online through social media and platforms operated by other companies.
- 4.2 When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

Other ways we may share your personal information

- 4.3 We may transfer your personal information to a successor body if the OU ceases to exist. We may also transfer your personal information if we're under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our enquirers, visitors and students. However, we will always take steps with the aim of ensuring that your privacy rights continue to be protected.

5. Where we store your personal information

- 5.1 Generally, information you provide to us is stored on our secure servers, or on our cloud-based systems which are located within the European Economic Area.
- 5.2 If we transfer your information outside of the EEA, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include imposing contractual obligations on the recipient of your personal information, or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. For example, we would ensure that a US based supplier has signed up to "Privacy Shield".

6. How long we keep your personal information for

- 6.1 If we collect your personal information, the length of time we retain it is determined by a number of factors, including the purpose for which we use that information and our obligations under other laws. We will hold your personal information on our systems for as long as is necessary for the relevant activity.
- We will keep your record until an appropriate time after your last meaningful contact with us (this is set by business rules)
 - Records of specific interactions, e.g. enquiries you have made, are likely to be kept for between 3 and 6 years, depending on how relevant they are to your future study.

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- If you register as a student then we will collect more data about you and keep it for longer – please see the [student privacy notice](#).
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7. Your rights

7.1 You have a number of rights in relation to your personal information, which apply in certain circumstances. In order to exercise any of these rights, please contact us using the details in section 9 of this document.

7.2 You have the right to:

- access the personal information that we hold about you
- correct inaccuracies in the personal information that we hold about you
- request that we stop sending you direct marketing communications.

In certain circumstances, you have the right to

- have your details removed from systems that we use to process your personal data
- restrict the processing of your personal data in certain ways
- obtain a copy of your personal data in a structured electronic data file
- object to certain processing of your personal data by us

7.3 If you are concerned about the way we have processed your personal information, you can complain to the Information Commissioner’s Office (ICO). Please visit the ICO’s website www.ico.org.uk for further details.

8. Cookies

8.1 Like many other websites, our websites use cookies and similar technologies to obtain an overall view of visitor habits and visitor volumes, and to provide you with more useful and relevant adverts on our website and other websites. For more detailed information on how we use cookies and how to switch them off on your device, see our [Privacy and Cookies](#) page. You will need to allow “per-session” cookies in order to access password-protected OU websites

9. Contact us

9.1 Please direct any queries about this policy or about the way we process your personal information to our Data Protection Officer using the contact details below.

- Email data-protection@open.ac.uk
- Telephone: +44(0)1908 653994
- By post: The Data Protection Officer, PO Box 497, The Open University, Walton Hall, Milton Keynes MK7 6AT.

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