

# Corporate Contacts and Suppliers Privacy Notice

## 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.

## Scope

### What this document covers

- This privacy notice explains what we do with your personal information, your rights and how we protect it.
- It relates to all our business contacts, clients and suppliers – whether you have engaged with us online, over the phone, or face-to-face at your premises or ours
- This notice expands the information available at <http://www.open.ac.uk/privacy>

## Who we are

- 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.
- Where this document refers to “we”, “our” or “us” below, unless it mentions otherwise, it’s referring to the Open University
- The main establishment of the Open University is in the UK. If your data is collected by our office in the Republic of Ireland, then this will also be processed in the UK.

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

- We hold some information about individual business contacts, clients and suppliers to permit us to run the business effectively and provide the best customer service we can.
- Depending on our relationship with you, this “personal data” will include:

- Your name and contact details such as address, telephone number, and email address, normally business contact details unless you have provided us personal details for the purposes of staying in touch
  - Your correspondence, comments and feedback
  - Our contact history with you, including any biographical notes you have volunteered to us and which help us to personalise our relationship with you
  - If you call our main enquirer and student phone number, we record telephone calls. If you attend online meetings or presentations, we may record those
  - The account login details you use for our website (username and password)
  - Information on how you use our website, apps and web-based services, including what type of device you use and your IP address
  - Information about how you have interacted with our communications (for example, which emails or texts you have opened and your use of links) to improve the relevance and usefulness of our communications
  - Your preference as to whether and how you wish to receive our marketing communications
- Often you will supply us with your personal data directly, but we may collect it from publicly available sources such as your employer’s website. We may also be provided with your contact information by a colleague or related third party.
- 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.
- We will receive you details if you request an OU publication via a 3rd party site such as the BBC, or if you interact with us a social media site eg LinkedIn, Twitter or Facebook.

## How do we use your personal information?

- We use your personal information to conduct our business communications with you
- If relevant, your contact details will be used for recording and processing your orders or invoices and making or taking payment. If you are a supplier, we ask you to register on SAP Ariba, which has a specific [privacy statement](#).
- 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.
- We may request your participation in surveys to help us plan and improve our services and systems.
- We carry out activities to provide a safe environment, maintain security, and prevent and detect crime:
  - Administration of The Open University’s CCTV system, to provide a safe environment and facilitate the prevention and detection of crime
  - Vehicle registrations are used, if provided to the OU, to manage car parking and security

- If you call our main enquirer and student phone number, we record telephone calls to make sure that we have carried out your instructions correctly and to help us improve our services through staff training.
- If you attend an event, we may ask you about any reasonable adjustments you require. If you give us any health or disability information, we would only use it for this purpose, with your explicit consent.
- If you are taking part in research, then there is likely to be a participant information sheet providing more information about the research, and how the information you provide will be used.
- If you are given access to OU systems, then the personal data we process here is covered by the [Colleague privacy notice](#).
- We may retain your personal information for audit purposes, and we may use it when we test and maintain our systems.
- If we want to publish information relating to your work with us, for example in publicity material or as part of a testimonial, then we will ask for your consent to use a personalised or anonymous quote, or to publish any information which identifies you.

#### **Clients and prospective clients only:**

- We use information about our contacts and clients to give you a more personalised service, tailoring our marketing and communications to you. We conduct profiling based on our information about you, your interaction with the OU and the web content your view to tailor the content, channel and frequency of marketing content.
- We analyse business contacts and client data to inform our marketing strategy, and to enhance and personalise your customer experience. We also use it to identify others like you who may be interested in our products, and to verify the accuracy of data that we hold about you and create a better understanding of you as a customer.

#### **Lawful basis**

These purposes are either

- in our legitimate interest, if they relate to our administrative functions, or
- if they relate to conducting or disseminating academic research or improving our teaching and learning services, then they will be part of our public task.

Occasionally we will process business contact information because we have a legal obligation to do so, for example in response to a court order.

#### **Staying in touch**

- We want to keep in touch with clients and business contacts to tell you about our research, courses and services or to carry out market research, by post, email, phone, text or social media.
- Often, we will ask for your consent to do this. You can opt-out or object to communication, and you can change your mind at any time. Just get in touch using the

contact details in this document, or use the unsubscribe option within any of our marketing communications.

## **Who do we share your information with?**

- If you attend a meeting or event we may share your name and contact details with other attendees external to the OU.
- We work with service providers: partners, suppliers, insurers, aggregators and agencies so that they can help us provide our products and services. Where necessary we will share your personal information with third party service providers, who are under contractual obligation to protect your data. These third parties process your personal information on our behalf and are required to meet our high standards of security before doing so. We only share information that allows them to provide their services to us or to facilitate them providing their services to you.
- These third parties include:
  - Payment card companies and those providing payment services
  - Marketing and advertising companies
  - Client research companies
  - Mailing houses who issue postal or email marketing
  - Companies who provide our contact centres and help desks
  - Website and social media providers
  - IT service providers
  - Couriers and delivery companies
  - Professional advisors, including accountants, lawyers and management consultants.
- We also use third parties to identify audiences for advertising: if you are a client or prospective client, 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.
- We may provide some details of your work with us to our funding bodies, as part of our public tasks of undertaking academic research and knowledge exchange activities, or delivering Higher Education qualifications.
- Where necessary we will also share information where required to by law or in the public interest, with, for example, the police or HM Revenue and Customs, or to exercise or defend our legal rights.

## **Other ways we may share your information**

- 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.

## Do we transfer information outside the European Economic Area (EEA) ?

- Generally, information you provide to us is stored on our secure servers, or on our cloud based systems which are located within the UK or the EEA.
- Where we use service providers outside the UK, or we transfer data to international partners, we use appropriate contractual safeguards, for example the standard contractual clauses for international transfers. Examples of our international transfers where we have standard contractual clauses in place are:
  - Some of our Office365 data is held within the EU by Microsoft.
  - Corporate prospect and client information is held in Salesforce, a US based cloud IT service.
  - Events where booking administration is done via Eventbrite is stored in the US.
  - Our supplier data is held on an IT service in Germany.
  - We have IT support contracts with offshore suppliers, who may have access to personal data.
- If your data is collected by our office in the Republic of Ireland, then this will also be processed in the OU's main establishment in the UK.
- For further information please contact us using the details in this notice.

## How long do we keep your personal information for?

- If we collect your personal information, the length of time we keep it for is determined by a number of factors including our purpose for using the information and our legal obligations.
- We have a retention schedule for information and keep identifiable records only for as long as they have a legal or business purpose.
- Most business contact information will be kept for 6 years from the end of the financial year in which our business relationship ends, or from your last meaningful contact with us, to meet our client service, accounting and auditing requirements. Some types of information are kept for longer or shorter periods. For full details of our retention policies, please get in touch using the contact details above

## Your rights

- 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 this document. These are described in more detail [by the Information Commissioner's Office](#).
- You have the right
  - to [access the personal information](#) we hold about you and to receive a copy
  - to [correct inaccuracies](#) in the personal information we hold about you
  - to [have your data deleted](#) when it is no longer required

In some circumstances, you also have the right

- to [limit how we use](#) your personal information,
- to [data portability](#)
- to [object to the use](#) of your personal information

Where we rely on consent as the legal basis on which we process your personal information, you may also withdraw that consent at any time.

- 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](http://www.ico.org.uk) for further details, or you can use their online tool for reporting concerns: <https://ico.org.uk/concerns/>

## Contact us

- Please direct any queries about this document 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](mailto: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.
- Data subjects within the EU can contact the Data Protection Officer c/o the Open University in Ireland: Holbrook House, Holles Street off Merrion Square, North Dublin 2, [D02 EY84](#).