



The University of the West Indies General Data Protection Statement

Commitment to Individual Privacy

Personal data is any information, whether electronic or hard-copy, that relates to an identified or identifiable living individual or someone who has died less than 30 years ago. Different pieces of information, which collected together can lead to the identification of a particular person, also constitute **personal data**. **Sensitive Personal data** refers to specific categories of data, which are defined as data including information relating to a person's racial origin; political opinions; religious or other beliefs; physical or mental health; sexual life; criminal convictions, or the alleged commission of an offence; trade union membership.

The **data subject** is the individual who can be identified from the personal data and the University is referred to as the **data controller**. The University of the West Indies (hereinafter 'The UWI' or 'us') is committed to protecting all personal data, including sensitive personal data, in its possession. The UWI understands its obligations to all persons whose personal data, including sensitive personal data, is in its possession.

This statement provides information about the collection, processing and storage of personal data, including sensitive personal data, in the possession of The UWI and should be read in conjunction with The University of the West Indies Data Protection Policy and individual privacy statements developed from time to time. This statement is general and is intended to cover all categories of individuals, however, specific statements are available, with more detailed information concerning the processing of personal data, for staff, students, and alumni.

Information Collected

Students

The UWI will collect, maintain and use your personal data and sensitive personal data only for purposes for which they are collected and to facilitate the administration of your programme of study while you are registered with us and to facilitate the lawful processing of your data after you leave the University.

Alumni

As a former student, the University will wish to maintain contact with you for several reasons, including, sending details of activities that may be of interest to you and opportunities to network with other alumni. Therefore, some of your details will be passed to Alumni Relations from the campus from which you read for your programme to be included on the alumni database.

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Staff (including contractors)

The UWI will collect, maintain and use the personal data, including sensitive personal data, of staff members and contractors (non-staff personnel). This collection, maintenance and use, will be for The UWI's management and administrative purposes only. The personal data will enable The UWI to effectively, lawfully and appropriately manage its relationship with staff and contractors during the recruitment/selection process, while a staff member or contractor is employed to, or engaged with The UWI and after a staff member or contractor has left The UWI.

Additionally, the University holds information about members of staff in order to manage staff recruitment, probation, development, safety, reward, discipline and other functions such as security, equal opportunities and welfare. In some cases, the University may process data to ensure that it is complying with its legal obligations. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question. For sensitive personal data, such as information about gender, health or medical conditions, the University may process these data to ensure compliance with its legal obligations (such as those in relation to employees with disabilities and for health and safety purposes).

Prospective Staff

If you are engaged with our recruitment process, for example, if you have applied for a job with us, The UWI will collect, maintain and use your personal data, including sensitive personal data, of prospective staff during recruitment, selection, hiring and on-boarding.

Information Collection

Personal data may be obtained directly from application and supporting documents submitted to the University, or from interactions, including interviews, conducted by University staff. In addition, personal data may be obtained from current staff in sections of the University with which you might have had previous interactions, or from external entities from which the University gets background information. These sources include:

- referees who have been listed on your application documents;
- other institutions (academic and otherwise) listed in your documentation;
- publicly available sources, example Social Media.

Information Use and Sharing

Personal data, including sensitive personal data, may be used for any number of operations within the University's stated intent of delivering educational services. These include:

- assessing the accuracy of the information provided by contacting other parties referenced in the information provided;
- analysing the information to determine if the data subject is suitable as a student, staff member, contractor, supplier, researcher, or any other collaborator with The UWI;
- preparing payments (payroll, refunds, transfers, etc.) to either the data subject or to a third party once the data subject has given their consent for this to be done.

Within The UWI, personal data, including sensitive personal data, may be shared among authorised members of staff who will process your data for the purpose for which it was collected. Sensitive personal data is data consisting of racial or ethnic origin, political opinions, religious or

philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sexual orientation.

The UWI may disclose certain personal data, including sensitive personal data, to third parties in certain circumstances. For example, relevant data may be shared with your next-of-kin with your consent or in an emergency, with law enforcement authorities or the courts where required.

The UWI will not share your data with any third party, except as allowed for within the context of its Data Protection Policy or where required by law. The UWI will not sell your personal data, including sensitive personal data, to third parties or permit third parties to sell the data we have shared with them.

Transfer of Personal Data, including Sensitive Personal Data, to other jurisdictions

The UWI is a regional institution and may share your personal data with other campuses or UWI Global partners as lawfully necessary. Where data is shared with a non-UWI entity, the third party will be required to comply with and safeguard the data under the terms of the legislation in that country or, where no legislation exists, under the terms of the UWI Data Protection Policy.

Your Rights

You have the following rights

1. To be informed This Privacy Statement provides the information you are entitled to receive about how The UWI uses your personal data, including sensitive personal data.
2. Access Please contact us if you would like confirmation that your data is being processed and to access your personal data, including sensitive personal data. (Usually be provided within a month of the request.)
3. Correction Please inform us of any data which you believe is incorrect which you would like corrected and we will respond within 30 days of the request.
4. Erasure You may exercise your right to have your personal data, including sensitive personal data, erased in limited circumstances in accordance with University policies and procedures. The University will however keep your data for accreditation and other purposes established from time to time.

You may request that we restrict or suspend the processing of your data. We will comply with your request as long as it does not compromise the University's legal and administrative obligations.

You may in accordance with this policy require that we restrict the processing of your data. If possible, we will inform any third parties to whom your data has been disclosed of your requirement.

5. Data portability Your data is spread across manual records and electronic systems. The UWI will do its best to provide information in a portable format. However, it might not be able to create a system to provide this information.
6. To object The UWI will discontinue processing your data if you object to processing based on legitimate grounds and where the discontinuation of the processing of your data will not compromise the University's accreditation or lawful obligations.
7. Not to be subject to automated decision-making including profiling The UWI does not utilize automated decision-making i.e. (a) making a decision solely by automated means without any human involvement and (b) automated processing of personal data, including sensitive personal data, to evaluate details about an individual.