

# External Professional Contacts Privacy Notice

## Data Controller

**Northumbria University Digital Services Limited** ("NUDSL", "we", "our", "us") processes personal data in accordance with our obligations under the UK General Data Protection Regulation ('UK GDPR') and is a registered Data Controller with the Information Commissioner's Office ('ICO'), which is the supervisory authority responsible for the oversight and enforcement of data protection legislation within the United Kingdom.

NUDSL is a wholly owned subsidiary of Northumbria University and operates within the University's governance framework. As a result, certain University policies and services, including data protection oversight, apply to NUDSL.

**Registration Number:** ZC088794

## Overview

This privacy notice is a statement that describes how and why we process ('collect', 'use', 'retain', 'disclose', 'dispose of') personal data arising from our relationships with customers and their employees, individuals who may become customers or engage with NUDSL, and external organisations and their employees who engage with us for other purposes such as partnerships or collaborative activities. ("you", "your").

This notice also explains how you can control how we use your information in accordance with your rights under relevant data protection legislation.

## Where do we get your personal data from?

You provide data to us directly as part of your professional relationship with us, including via email, telephone or web enquiries, or collaborative working, and data is further collected or updated as part of this ongoing relationship.

We may also obtain information from third parties such as one of your colleagues, from your organisation or from publicly available information on your organisation's website or professional profile (e.g. on LinkedIn, Rocket Reach, Beaurhurst).

In most cases the provision of your personal data is necessary for us to manage our professional relationship with you. If you do not provide the requested information, we may be unable to provide services, enter into agreements, or facilitate participation in relevant activities.

## Categories of personal data processed by NUDSL

To carry out our activities and to manage our relationship with you, we may collect, store, and process the following categories of personal data:

- Name and professional details
- Contact information
- Professional role and organisational affiliation
- Records of interactions

## **Activities we process your personal data for and the lawful basis**

Under Article 6 UK GDPR we must identify a basis for the "Lawfulness of processing" of our activities involving your data. These are broadly described as: 'Consent', 'Contract', 'Legal Obligation', 'Vital Interests', 'Public Interest (or Public Task)' and 'legitimate interests'.

Data is required for the following activities, which have been identified as necessary "for the performance of our contract with you" or, in the case of potential partners, "in order to take steps prior to entering into a contract".

- Management and administration of services and contracts.
- Managing professional relationships and communications relating to those services.
- Responding to enquiries and requests for information.

## **Photography and Filming**

Photographs and video may be taken at events for communications and promotional purposes. This processing is carried out on the basis of our legitimate interests in promoting our activities. If you wish to object, please notify the event organiser or contact the DPO using the details below. Where images have already been published, we will take reasonable steps to remove them upon request.

## **Sharing your Personal Data with Third Parties**

From time to time, we may be required to share limited personal data with third parties for specific purposes.

On occasion NUDSL may also be obliged to provide information to the police, local authorities or relevant government departments if it is deemed necessary under the appropriate exemption for the prevention or detection of crime.

Any other disclosures that may be required but not listed above will be in accordance with your rights and the requirements of the UK GDPR.

## **International Transfers**

We do not routinely transfer personal data outside the United Kingdom. Where any external service provider processes personal data outside the UK, appropriate safeguards will be in place in accordance with UK data protection legislation, such as an adequacy regulation, International Data Transfer Agreement (IDTA), or other approved transfer mechanism.

## **Automatic Decision Making**

NUDSL does not use call recordings or associated personal data to carry out automated decision-making or profiling that produces legal effects or similarly significant outcomes for individuals.

## **How personal data is stored securely by NUDSL**

We have implemented appropriate physical, technical, and organisational security measures designed to secure your personal data against accidental loss and unauthorised access, use, alteration, or disclosure. In addition, we limit access to personal data to those employees, agents, contractors, and other third parties that have a legitimate business need for such access.

All of our employees, contractors and volunteers with access to personal data receive mandatory data protection training and have a contractual responsibility to maintain confidentiality and access to your data is restricted to those members of staff who have a requirement to access it.

NUDSL utilises different storage solutions and IT systems, some of which are outsourced to third party providers.

Where processing is carried out by an external third party, it takes place under an appropriate agreement that requires them to process personal data securely and in accordance with applicable data protection legislation.

## **How long personal data is held by NUDSL**

NUDSL follows Northumbria University's records retention schedule as part of the governance framework that applies to the company as a wholly owned subsidiary of the University. The schedule is published on the University's website. In summary, the relevant retention periods for this type of data are as follows:

We will keep your personal information for as long as we have a professional relationship with you. For enquiries and unsuccessful proposal developments this will be for 3 years following the completion of the enquiry. Where we have had an ongoing relationship, we will keep your data for up to 6 years after the end of the relationship. The following reasons justify our need to retain your data for the periods described:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.
- To allow monitoring and reporting of activity to ensure our ongoing work with external organisations is effective, responsible, and aligns with the goals of the institution and our wider commercial network.

We may keep your data for longer than outlined above if required to do so for legal reasons. If we do, we will make sure that your privacy is protected and only use it for those purposes.

## **Your Rights under UK GDPR**

Under the UK GDPR, you have a number of rights in relation to the processing of your personal information, each of which may apply to differing degrees dependent upon the nature of the processing and the legal basis for it. You have the right to:

- Be informed as to how we use your data (via this privacy notice)
- Request access (a copy) of the personal information that we hold about you.
- Correct inaccurate or incomplete data
- Request that we stop sending you direct marketing communications.

In certain circumstances, you may also have the right to:

- Ask to have certain data erased by us.
- Request that we restrict certain processing of your personal data.
- Request that we provide any data you submitted to us electronically be returned to you or passed to a third party as a data file.
- Object to certain processing of your personal data by us

In some cases, there may be specific exemptions as to why we aren't able to comply with some of the above. Where this is the case, we will explain the reasons why.

In order to exercise any of the above rights, please contact the Data Protection Officer (details below).

### **Data Protection Officer**

NUDSL shares a Data Protection Officer with its parent organisation, Northumbria University. The Data Protection Officer responsible for overseeing data protection compliance for NUDSL is Duncan James. Contact the DPO if you would like to:

- Receive a copy of your data.
- Have any questions you feel have not been covered by this Privacy Notice
- Have any concerns about the processing of your data
- Wish to make a complaint about the processing of your data

You can email at [dp.officer@northumbria.ac.uk](mailto:dp.officer@northumbria.ac.uk) or call +44 (0)191 243 7357

### **Lodging a Complaint with the Information Commissioners Office (ICO)**

If you are dissatisfied with our processing of your data, or a response to a complaint you have made to us about it, you have the right to complain to the ICO.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow

Cheshire  
SK9 5AF

Telephone: 0303 123 1113 (local rate) or 01625 545 745  
For more information see Information Commissioner's web site.

## **Changes to this privacy notice**

We keep this privacy notice under regular review and will communicate any significant updates to you. This privacy notice was last updated in March 2026 and will be reviewed annually.