

Call Recording 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 explains how and why we process (‘collect’, ‘use’, ‘retain’, ‘disclose’, and ‘dispose of’) personal data obtained through the recording of telephone calls to and from our service. Call recordings may contain personal data relating to individuals contacting us for support or information, and employees of NUDSL who answer those calls (“you”, “your”).

This notice also explains how we use call recordings, how long they are retained, and how you can exercise control over your personal data in accordance with your rights under relevant data protection legislation.

Where do we get your personal data from?

When you contact our service by telephone, your call may be recorded. Call recordings will typically capture the conversation between you and the NUDSL employee answering the call, and may therefore include personal data relating to both the caller and the employee handling the interaction (See <Employee Privacy Notice>).

Information contained within call recordings is provided directly by participants during the course of the call. This may include details necessary for us to identify the caller, understand the issue being reported, provide support, or otherwise respond to the enquiry.

Participation in a recorded call is not mandatory. If you object to your call being recorded, please inform the member of staff handling the call and the recording will be stopped. Your ability to use the service will not be affected, and support will continue without recording.

Categories of personal data processed by NUDSL

To operate our telephone support service and manage interactions with callers, we

may collect, store, and process the following categories of personal data within call recordings:

- Name or other identifying information provided during the call
- Contact information such as telephone number or email address if provided
- Status or relationship to the organisation receiving support (for example university staff member or student) where relevant to the enquiry
- Details of the enquiry, issue, or request being discussed
- The content of the conversation between the caller and the NUDSL employee handling the call.

It is possible that additional data including special category data could be recorded where it is overheard or volunteered by you, we will never ask you to volunteer this type of data with us.

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 contained within call recordings is processed for the following activities. These activities have been identified as necessary for the purposes of our legitimate interests in operating, managing, and improving our services:

- Confirming details of incidents, enquiries, or service requests during the call.
- Reviewing call recordings to monitor service quality.
- Using recordings to support training, coaching, and performance management of staff.
- Maintaining accurate records of interactions relating to incidents, requests, or enquiries.
- Investigating service issues, complaints, or disputes where necessary.

Sharing your Personal Data with Third Parties

We would not normally share copies of call recordings with third parties however from time to time, we may be required to share limited personal data with third parties for specific purposes, for example with the institution you work for or study at or to comply with the rights of other data subjects captured in the call recording.

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 however, in summary, the relevant retention periods for call recordings will be 3 months from the date the call was recorded, after which they will be securely and confidentially deleted.

In some circumstances, recordings may be retained for longer than this period where necessary. This may include situations where recordings are required for the investigation or resolution of a complaint, service issue, dispute, or disciplinary matter, or where retention is necessary to comply with legal or regulatory obligations. In such cases, access to the recordings will be restricted and they will only be used for the purposes for which extended retention is required.

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

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 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.