

# Norman Managed Services Call Recording Privacy Notice



This privacy notice describes how and why we collect and process your personal data to record phone calls you make to our service. It also explains your rights under the GDPR.

## 1. Data Controller

The University of Northumbria at Newcastle (“we”, “our”, “us”) is a registered Data Controller (Registration Number: **Z7674926**) with the Information Commissioners Office. We are committed to processing personal data in accordance with our obligations under the General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (DPA2018).

## 2. Where do we get your personal data from?

As a user of the Norman service, you might make contact with us via telephone when you do this, we may record the call. When a call is recorded, we collect:

- A recording of the conversation
- Your phone number

We will always tell you when a call is being recorded and you will always be provided with the option to stop the call from being recorded.

## 3. Categories of personal data we process

We may collect and process the following categories of data about you:

- Name
- University email address
- University ID
- Personal email
- Personal telephone number
- Course being studied
- Customer type (staff, student, other stakeholder)

### Special Category Data

It is also possible that we might process certain Special Category Data although we would only ever do so to the most limited extent necessary to support your enquiry, we would also never ask you to disclose any Special Category Data to us although you might volunteer it if you feel it is relevant to your enquiry.

## 4. The lawful basis for Processing

We need to process personal data to respond to your enquiry or to provide you with information we think you might find useful. The University relies on the following legal bases to process information about you:

- **Legitimate Interests:** Where to do so and it does not unduly prejudice your rights and freedoms, we may process data for internal reporting and planning or to communicate marketing messages to you promoting our services, courses, and events.

### Special Category Processing

- **Explicit Consent:** We may rely on your explicit consent to process Special category data in relation to specific services. Consent can be withdrawn at any time.

### 5. Activities we process personal data for

We may monitor or record phone calls to our service clearing for staff training purposes and to help improve our service. We might also monitor or record phone calls to assist us in investigating a complaint.

### 6. How personal data is stored securely by Northumbria University

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. Access to data is limited to university employees, agents, contractors, or third parties that are authorised to work on our behalf, for example where storage solutions and IT systems are outsourced to third party providers. Where processing takes place with an external third party, processing takes place under an appropriate agreement outlining their responsibilities to ensure that processing is compliant with the Data Protection legislation and verified to be secure

### 7. Sharing your Personal Data with Third Parties

Your personal information will only be disclosed to third parties where we have an appropriate lawful basis to do so, which may include the following:

- With third parties who securely process data on our behalf in order to facilitate our relationship with you, such as software service providers providing externally hosted software solutions.
- Any other disclosures that may be required but not listed above will only ever be in accordance with your rights and the requirements of the GDPR.

### 8. Transfers to countries outside of the European Economic Area (EEA)

Some Partner and IT services providers are based in countries outside of the EEA. The university will only transfer data to outside the EEA where satisfied that both the party which handles the data and the country it is processing it in provide adequate safeguards for personal privacy. Where data is shared with third party countries, we ensure that these countries are either approved by the European Commission as having 'adequate protection' or ensure that we have put in place 'appropriate safeguards and contracts with these organisations, to maintain the security of the

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data and your rights under relevant Data Protection legislation.

### 9. How long do we hold personal data?

Personal data is retained for as long as it is required to fulfil the purpose for which it is held and then to fulfil any legal requirements.

Call recordings will be retained for a period of 3 months from the date of the call being recorded after which it will confidentially and securely deleted.

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

### 10. Your Rights under GDPR

Under the 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 order to exercise any of the above rights, please contact the Data Protection Officer. For more information about any of the above please see the **GDPR pages of our website**.

### 11. Data Protection Officer

The Data Protection Officer (DPO) for Northumbria University can be contacted via email at [dp.officer@northumbria.ac.uk](mailto:dp.officer@northumbria.ac.uk) or you can call +44 (0)191 243 7357

### 12. 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, and Telephone: 0303 123 1113 (local rate) or 01625 545 745 Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

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For more information see [Information Commissioner's web site](#).