

**Buckinghamshire New University**  
**Data Protection Statement for the BNU Graduation Ceremony**  
Version: 1.0

**Introduction**

Buckinghamshire New University is a registered data controller and will collect and use information about you in accordance with the data protection principles set out in UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA)).

Further information about Buckinghamshire New University can be found on the University's website (<https://bucks.ac.uk>).

**Purpose of this notice**

This privacy notice outlines what to expect us to do with your personal information when you attend a graduation ceremony as a graduand or guest. Personal information (or personal data) is any information which relates to and identifies you. Data protection legislation (the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA)) set out how we should handle your personal information.

**Why do we collect and process your personal data?**

It is necessary for the University to process your personal data in order to ensure that:

- You are able to receive an invitation to your graduation ceremony;
- You are able to book and pay for your ceremony tickets;
- Your name appears in the Graduation ceremony booklet;
- Your name appears on graduation memorabilia and items;
- You have an opportunity to give feedback on your graduation experience;
- We are able to respond to any questions you may have related to your ceremony, and forward your query to another department if it is not directly related to graduation.

We need to use your personal information to plan, run and administer our graduation ceremonies, and for related marketing and publicity purposes. Further information about the main purposes for which we use your personal data is set out below.

**How will we use information about you?**

Administration:

As a graduand, we use your information to communicate with you (including but not exclusively by email, post and telephone) about:

- Your eligibility to attend the ceremony;
- Collecting information about you and your guests, including any information you may provide regarding any special arrangements you have requested.

We may also use your information for:

- The production of tickets;
- Logistics such as seating plans, etc.;
- Updating your contact details in our student and alumni records systems.
- The production of Graduation Programmes which will include information like your name, qualification obtained and degree classification. These will be provided to all graduands who attend a ceremony.

### Marketing, publicity and video capture/live streaming:

Photographs and videos will be taken at our ceremonies, which may be carried out by BNU staff or duly delegated representatives (possibly including externally contracted agents). Photographs and video of graduands and guests at our graduation ceremonies may be used for marketing and publicity purposes, which will include using images and video on our website and social media channels. Ceremonies will be filmed, which will be streamed live and a recording will be made available to view after the live event.

Individual photographs of graduands will be taken at the ceremony and will be made available to purchase from our official photographer.

### Serving you as alumni of BNU:

When you graduate, you become an alumni of BNU. We will use information about you to invite you to become a member of our alumni network, which aims to keep you informed of University news, publications and events, career opportunities, academic and professional development opportunities and much more. When you complete your graduation booking form, we will use the information on your form to update your contact details in our alumni records system. If you opt in to receiving communications from the alumni network, your information will be used to send those communications using the channels you have selected. You can opt out of receiving communications from the alumni network at any time by contacting the University.

### Security and crime prevention:

The University operates a CCTV system for security and crime prevention purposes. This covers University buildings (inside and outside) and public areas across the main campus. Your images are likely to be captured by the CCTV system while you are on, in, or near University premises. CCTV footage will be used to maintain the security of the University community, enhance public safety, prevent and detect crime and apprehend and prosecute offenders. CCTV footage may be used, where there is a lawful basis, in the investigation of complaints and allegations made under the University's rules, regulations, procedures and codes of practice and may also be disclosed to other organisations such as the police.

### Research, reporting and statistics:

We will use your information to compile statistics and for research, surveys and market research to help with corporate planning, reporting and University administration, as well as for statutory reporting purposes to external agencies, where required. We will also use your information to ensure and monitor our compliance with legislation including laws relating the equality and health and safety.

### **What will happen on the day?**

On the day of your graduation, there will be signage around the sites alerting you and your guests to the potential for photography and filming, reiterating elements of this guidance.

Photographs and videos may be taken at any time during and in any of the locations used for your graduation ceremony. There will be specific times and places where filming and photography will definitely take place, such as the procession of each graduand across the stage.

### **Where do we get your personal data from?**

If you are eligible to attend one of our graduation ceremonies, the University will use information held in our student records systems, as well as any additional information you may give us as part of your graduation booking, and during any related communications.

If you are attending a ceremony as a guest, we may use information about you in order to arrange and run the graduation ceremony. This could include information that is provided by our graduands as part of their graduation booking, or in any other related communications, such as any access requirements you may have.

We also take photographs and record video footage of all attendees at our graduation ceremonies, including the procession of each graduand across the stage during which time their name will be read out. Photography and video may be taken by BNU staff or duly delegated representatives (possibly including externally contracted agents).

Crowd photographs and video may be taken by the University's photographers and videographers (or duly delegated representatives), which may include images of yourself and your guests. If you attend a graduation celebration such as a prizegiving ceremony, distant images of yourself and your guests may be publicly available on the University website via a webcam.

Other parties may be on site, for example journalists interviewing honorary graduates and other VIPs. If you don't wish to appear in such filming or photography, you should maintain your distance from any filming taking place.

### **How long we keep your personal data?**

We will keep your personal data for only as long as is necessary for the purposes for which it was collected. Personal data is retained and disposed of in accordance with the University's records retention schedules, which are detailed in the [Records Lifecycle Management Scheme](#). Some information may be archived for long term historical preservation. Data will be securely destroyed when no longer required.

### **What is the legal basis for BNU using my information in this manner?**

The following UK GDPR regulations allow for the processing information about you for the purposes set out in this notice:

Article 6(1)(a) and Article 9(2)(a), which allow us to process personal data where you provide your consent. If you provide information to us about any disabilities, medical needs or other health data to request any special arrangements during the ceremony, you are consenting to us using that information to make reasonable adjustments.

If you are a graduand you must ensure you have the consent of your guests to provide any similar information relating to them. Once we have taken action to make any reasonable adjustments, we will rely on Article 6(1)(c), Article 9(2)(g) UK GDPR and Schedule 1(6) DPA to retain information to demonstrate how we have acted on your request, to comply with equality legislation.

Article 6(1)(c), which allows us to process personal data when it is necessary to comply with a legal obligation. We are legally required to process some information for the purposes of complying with equality and health and safety laws.

Article 6(1)(f), which allows us to process personal data where it is in our, or someone else's, legitimate interests to do so and it does not unduly prejudice your rights and freedoms. We rely on this condition to, among other things:

- Run the ceremonies;
- Deliver some services and facilities to you such as the alumni network;
- Produce marketing and publicity materials;
- It is also in the interests of BNU and our graduates, their families and friends to live-stream and record our ceremonies so that those who cannot attend in person can share in the celebrations live or at a later date.

- Produce some internal reports, research and statistics as part of continual strategic and operational planning.

### **What are your rights as a data subject?**

Under the data privacy legislation, you have the right to:

- Withdraw consent where that is the legal basis of our processing;
- Access your personal data that we process;
- Rectify inaccuracies in personal data that we hold about you;
- Be forgotten so that your details are removed from systems that we use to process your personal data;
- Restrict the processing in certain ways;
- Obtain a copy of your data in a commonly used electronic form; and
- Object to certain processing of your personal data by us.

If you wish to request a copy of the personal data held by the University about you or to correct any information we hold about you, contact the relevant department in the first instance. If you have any further concerns about the accuracy of your personal data as held by the University or you want to submit a data subject request, contact the University's Data Protection Officer.

Please see the Information Commissioner's Office web site (<https://ico.org.uk>) for further information about your data privacy rights. You may also contact the Data Protection Officer for further information.

You have a right to complain to the Information Commissioner's Office about the way in which we process your personal data. Please see <https://ico.org.uk>.

### **How do you unsubscribe from unwanted communications?**

We will communicate with you by email, post, telephone and SMS. Please contact the relevant University department if you want to unsubscribe from these communications, change the method of communication that we use or are concerned about their content (e.g. unwanted marketing information). Contact the Data Protection Officer, if you are unsuccessful in unsubscribing from our communications and/or remain concerned.

### **Website**

We use Cookies (that will collect your personal data) on our web pages. The Buckinghamshire New University website privacy statement explains how data may be gathered about users of the University's website. The University's privacy notices do not cover the links within the Buckinghamshire New University site which link to other external websites.

### **Changes to our privacy policy**

We regularly review the University's privacy notices. We will communicate final changes to this notice to students via the most effective channels.

### **What should you do if you have concerns about the way we process your personal data?**

If you have any concerns with regards to the way your personal data is being processed or have a query about this Notice, please contact our Data Protection Officer, Nicholas Roussel-Milner at [dpofficer@bucks.ac.uk](mailto:dpofficer@bucks.ac.uk).

Our general postal address is:	Buckinghamshire New University, Queen Alexandra Road, High Wycombe, Buckinghamshire HP11 2JZ
Our telephone number is:	+44 (0)1494 522141
Our ICO data controller registration number:	Z772474X

You also have a right to complain to the Information Commissioner's Office about the way in which we process your personal data. Post: Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK95AF. Tel: 0303 123 1113. <https://ico.org.uk>.