

**Contact details:**

The Data Controller of the information being collected is UHI North, West and Hebrides, Ormlie Road, Thurso, Caithness, KW14 7EE. For any queries or concerns about how your personal data is being processed you can contact the Data Protection Officer at [dpo.nwh@uhi.ac.uk](mailto:dpo.nwh@uhi.ac.uk)

**This privacy statement relates to the following processing:**

This privacy statement relates to the use of personal data supplied by individuals making a course or other enquiry through the College’s web forms, by email or by phone including Subject Access Requests, Freedom of Information Requests and Complaints.

**How we use your information:**

<p>Purpose 1: Manage course or other general enquiries</p> <p>Purpose 2: Manage Data Subject Access Requests (DSAR)</p> <p>Purpose 3: Manage Freedom of Information Scotland Act (FOISA) and Environmental Information Regulation (EIR) requests</p> <p>Purpose 4: Manage complaints</p>	<p>For each purpose, information provided by you will be used to:</p> <ul style="list-style-type: none"> <li>• record and progress your request</li> <li>• correspond with you</li> <li>• seek clarification (if required)</li> <li>• locate, retrieve, and return the requested information</li> </ul>
<p>Purpose 2: Manage DSAR requests</p> <p>Purpose 3: Manage FOISA requests</p>	<p>To verify your identity (if required):</p> <p>Depending on the nature of our relationship with you, ID may be required to ensure that personal data is only released to the correct person.</p> <p>The requestor name must be provided for an FOISA request to be valid under section 8(1)(b). If we suspect that a pseudonym is being used, we may request a copy of your ID to verify that the request is valid.</p>

**Our legal reasons for using the data are:**

**To achieve the following purposes:** Purpose 1: Manage course or other general enquiries

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Our legal reason for using the data is that you have given us your **consent** by providing your contact details. If you were to withhold the personal information, we would be unable to fulfil your enquiry or request. You have the right to withdraw your consent at any time by emailing [info.nwh@uhi.ac.uk](mailto:info.nwh@uhi.ac.uk)

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We use [special category data](#) that you may choose to share with us to achieve this purpose

Our additional lawful basis for processing this information is your **explicit consent** if you choose to share sensitive personal data with us as part of your submitted enquiry. You have the right to withdraw your consent in relation to this processing by using the contact email address above.

If you share health data with us to request reasonable adjustments or equality of access, for example prior to visiting our campus, then our lawful basis for processing this data is for **reasons of substantial public interest** to *promote equality of opportunity or treatment*, referring to the Equalities Act 2010 as a basis in law.

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To achieve the following purposes: Purpose 2: Manage DSAR requests, Purpose 3: Manage FOISA and EIR requests, Purpose 4: Manage complaints

Our lawful basis for processing is to comply with a **legal obligation** to respond and satisfy requests received under the following legislation:

- Data Protection Act 2018 (DPA 2018)
- Retained UK General Data Protection Regulations (UK GDPR)
- Freedom of Information (Scotland) Act 2002
- Environmental Information (Scotland) Regulations 2004
- Scottish Public Services Ombudsman Act 2002

<p>We use <a href="#">special category data</a> that you may choose to share with us to achieve the above purposes</p>
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<p>We do not routinely collect special category data; if you choose to share sensitive personal data with us as part of your submitted request then our additional lawful basis for processing this information is your <b>explicit consent</b>. You have the right to withdraw your consent specifically in relation to this processing by contacting <a href="mailto:dpo.nwh@uhi.ac.uk">dpo.nwh@uhi.ac.uk</a></p>
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**Withholding personal information**

If you were to withhold personal information, then we would be unable to fulfil your enquiry or request. Requests received under legislation such as FOISA, UK GDPR and the DPA 2018 may not be considered valid if you withhold your name, contact details and (in certain circumstances) proof of identity.

Your data will, or may, be shared with the following recipients or categories of recipient:

<p><b>Purpose 1: Manage course or other general enquiries</b></p>	<ul style="list-style-type: none"> <li>• It may be necessary to pass your query onto a member of staff in the University of the Highlands and Islands or one of the UHI Academic Partners to allow us to give you the best response.</li> <li>• During the audit process personal data may become viewable to <b>auditors</b>.</li> </ul>
<p><b>Purpose 2: Manage DSAR requests</b> <b>Purpose 3: Manage FOISA and EIR requests</b> <b>Purpose 4: Manage complaints</b></p>	<ul style="list-style-type: none"> <li>• <b>Relevant regulatory bodies</b> – to comply with further investigations if you decide to escalate our handling of your request or complaint to the regulator: <ul style="list-style-type: none"> <li>○ <a href="#">Information Commissioner’s Office</a> (UK Data Protection Regulator)</li> <li>○ <a href="#">Scottish Information Commissioner</a> (Regulator for FOISA and EIRs)</li> <li>○ <a href="#">Scottish Public Services Ombudsman</a> (public services complaints handling body)</li> </ul> </li> </ul> <p>For information regarding the regulators’ treatment of your personal data, please access the relevant linked privacy notice.</p> <ul style="list-style-type: none"> <li>• If you have nominated a representative to submit a request on your behalf, we will share information with this individual, (only where the appropriate consent has been provided by you).</li> <li>• During the audit process personal data may become viewable to <b>auditors</b>.</li> </ul>

**Retention:**

Your data will be retained in accordance with the UHI NWH Records Retention and Disposal Policy, which follows the UHI Retention and Disposal Policy. If ID has been requested, only a record that your identity has been verified will be retained and copies will be securely destroyed.

**Your data subject rights:**

- The right to access your personal data
- The right to rectification if the personal data we hold about you is incorrect
- The right to restrict processing of your personal data
- The right to withdraw explicit consent, specifically in relation to the processing of your special category data contained in a DSAR, FOISA request or complaint.
- The right to [complain](#) to the Information Commissioner’s Office about our handling of your data.

**The following rights apply to personal data processed for Purpose 1 only:**

- The right to withdraw consent at any time
- The right to object to our processing of your personal data
- The right to request erasure (deletion) of your personal data
- The right to data portability