



Privacy Notice

Enquirers and registered
website users

Data Protection Office
Effective from: February 2023

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Summary

The University needs to collect and process personal data in order to answer enquiries, provide services, manage its operations effectively, and meet legal requirements. This document sets out how we use your personal data.

This document will be updated from time to time in order to ensure compliance with data protection legislation. It expands the information available at

<http://www.open.ac.uk/privacy>

Recent changes:

- Clarified some language
- Amended some lawful bases from legitimate interest to public task, for consistency

Scope

What this document covers

- Individuals who contact the OU to make enquiries and register to use the OU website.

What this document does not cover

- If you use OpenLearn, please see [OpenLearn's privacy statement](#)
- If you have ever registered or enrolled to study with The Open University, please see the [Students privacy notice](#).

Policy



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1. Who we are

1.1 The Open University is the data controller in relation to the processing activities described below. This means that the Open University decides why and how your personal information is processed.

1.2 Where this policy refers to “we”, “our” or “us” below, unless it mentions otherwise, it is referring to The Open University.

1.3 The main establishment of the Open University is in the UK. If your data is collected by our office in the Republic of Ireland, then this will also be processed in the UK.

1.4 Please direct any queries about this policy or about the way we process your personal information to our Data Protection Officer using the contact details below.

- Email: data-protection@open.ac.uk
- Telephone: +44(0)1908 653994
- By post: The Data Protection Officer, PO Box 497, The Open University, Walton Hall, Milton Keynes MK7 6AT.
- Data subjects within the EU can contact the Data Protection Officer c/o the Open University in Ireland: Holbrook House, Holles Street off Merrion Square, North Dublin 2, D02 EY84.

1.5 Depending on our relationship with you, you can update your contact preferences for marketing and research preferences [online](#), by using any

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unsubscribe options available in communications we send you, or by contacting us.

2. What information do we collect about you, and how do we collect it?

Personal information you give to us:

2.1 As soon as you contact us or register with us, we create a record in your name. To that record we add information that you give us whenever you contact us. We are likely to hold your name and contact details, details of enquiries you have made, and your study interests. You may give us information about “special categories” of data, if they are relevant to an enquiry. These include your racial or ethnic origin, religious beliefs, political opinions, membership of a trade union, physical or mental health. Information about criminal offences or criminal proceedings are treated similarly.

2.2 If you become a student, then we add the information you give us when you register and throughout your studies to this record. For more information, see the [Student privacy notice](#).

Information that we collect automatically

2.3 If you have registered with us, we will add to your record any activities that you carry out on our website. This might include diagnostic quizzes you complete, or modules you add to your basket.

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2.4 If you receive email marketing communications, we record if you open them and any links you click.

2.5 We record telephone calls and monitor other communications between you and the University to make sure that we have carried out your instructions correctly and to help us improve our services through staff training.

2.6 We automatically collect information when you browse our websites. Further information about this is given in our [Cookies](#) Policy.

Personal information we may receive from other sources

2.7 We may enhance our enquirer records with data received from third parties, in order to ensure we have up to date contact details for you, and in order to offer you more relevant communications. We will not contact you using details received from third parties unless we already have your consent for marketing communications.

2.8 We may receive your contact details when you have requested an OU publication via a 3rd party site such as the BBC (e.g. poster) or FaceBook (e.g. prospectus)

3. How do we use your personal information?

Where you have provided consent

3.1 If you have given your consent to receive marketing communications, then we may contact you with marketing information. NB If you apply to

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become a student and you had not previously set any preferences for marketing, then you may receive marketing information from us.

3.2 You are able to change your marketing preferences by using the information in section 1.

3.3 We use cookies and similar technologies to obtain an overall view of visitor habits and volumes to our website, and to provide you with more useful and relevant adverts on our website and other websites. For more detailed information on how we use cookies and how to change your preferences, see our [Privacy](#) and [Cookies](#) pages

Where the activity relates to our public task of delivering Higher Education qualifications, and promoting the educational wellbeing of the community

3.4 We will use and process your personal information to provide our services, activities and online content, to provide you with information about them, and to deal with your requests and enquiries.

Where the activity is in our legitimate interests

3.5 Our legitimate interests are to provide and improve our internal services, to manage our operations efficiently

- To show you targeted advertising on third party sites. We may use media providers' services (e.g. Facebook and Google) to securely match your contact details with their user profiles, to show you relevant advertising online, or to exclude you from advertising. We may also use this to identify a target audience with the same interests as you, who would receive

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targeted advertising delivered online through the third party social media platforms and services – who would receive relevant Open University adverts. For more information, see [how to control the ads you see on Facebook](#), [how to control the ads you see on Google](#), and [how Google ads work](#).

- You can ask us not to share your details with media providers, by using the details in [Section 9](#).
- We use “cookies” and similar technologies to enable functionality in our websites. For example, you will need to allow “per-session” cookies in order to access password-protected Open University websites. For more detailed information on how we use cookies, see our [Cookies](#) pages.
- To maintain network and information security
- For testing and maintaining our systems

Where the activity is part of our “public task”

3.6 Our “public task” is to deliver higher education qualifications and conduct academic research

- To give you relevant information about our services
- To analyse our enquirers and registered users to inform our marketing strategy, and to enhance and personalise your customer experience
- To verify the accuracy of data that we hold about you and create a better understanding of you as a customer.

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- To help us improve our services via staff training
- We may ask you to take part in specific research activities to either help us plan and improve our services, or for academic research purposes. We might contact you ourselves or ask outside research agencies to do so on our behalf.
- To assess and improve our service to customers through recordings of any calls
- To manage complaints

4. Who do we share your information with?

Our suppliers and service providers

4.1 We use third party suppliers and service providers for a number of activities, from sending bulk text messages and providing IT systems, to using agents for contacting international students and conducting market research. We also use media providers services (like Facebook and Google) to show you relevant advertising online, or to exclude you from advertising, and to identify target audiences like you (see 3.4)

4.2 When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

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Other ways we may share your personal information

4.3 We may transfer your personal information to a successor body if the OU ceases to exist. We may also transfer your personal information if we're under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our enquirers, visitors and students. However, we will always take steps with the aim of ensuring that your privacy rights continue to be protected.

5. Where we store your personal information

5.1 Generally, information you provide to us is stored on our secure servers, or on our cloud based systems which are located within the UK or the EEA. Where we use service providers outside the UK, or we transfer data to international partners, we use appropriate contractual safeguards, for example the standard contractual clauses for international transfers.

5.2 The main establishment of the Open University is in the UK. If your data is collected by our office in the Republic of Ireland, then this will also be processed in the UK.

6. How long we keep your personal information for

6.1 If we collect your personal information, the length of time we retain it is determined by a number of factors, including the purpose for which we use that

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information and our obligations under other laws. We will hold your personal information on our systems for as long as is necessary for the relevant activity.

- If you have an OU user account, this will exist until you ask for it to be deleted.
 - We will keep your record until an appropriate time after your last meaningful contact with us (this is set by business rules)
 - Records of specific interactions, e.g. enquiries you have made, are likely to be kept for between 3 and 6 years, depending on how relevant they are to your future study.
 - If you register as a student then we will collect more data about you and keep it for longer – please see the [student privacy notice](#).
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7. Your rights

7.1 You have a number of rights in relation to your personal information, which apply in certain circumstances. In order to exercise any of these rights, please contact us using the details in this document. These are described in more detail by the [Information Commissioner’s Office](#).

You have the right

- to [access the personal information](#) we hold about you and to receive a copy
- to [correct inaccuracies](#) in the personal information we hold about you
- to [have your data deleted](#) when it is no longer required

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In some circumstances, you also have the right

- to [limit how we use](#) your personal information,
- to [data portability](#)
- to [object](#) to the use of your personal information

7.2 Where we rely on consent as the legal basis on which we process your personal information, you may also withdraw that consent at any time.

7.3 If you are concerned about the way we have processed your personal information, you can complain to the Information Commissioner’s Office (ICO). Please visit the ICO’s website www.ico.org.uk for further details, or you can use their online tool for reporting concerns: <https://ico.org.uk/concerns/>

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