

# Privacy Notice for IT Reuse Scheme

## Purpose of the Privacy Notice

This privacy notice explains how the University of the West of England, Bristol (UWE Bristol) collects, manages, and uses your personal data for the purpose of **donating and/or distributing refurbished laptops and/or other IT devices are part of the IT Equipment Reuse Scheme**. 'Personal data' means any information relating to an identified or identifiable natural person (the data subject).

This privacy notice adheres to the General Data Protection Regulation (GDPR) principle of transparency. This means it gives information about:

- How and why your data will be used;
- What your rights are under GDPR; and
- How to contact UWE Bristol in relation to questions, concerns or exercising your rights regarding the use of your personal data.

### Why are we processing your personal data?

We are processing your personal data in order to assess your enquiry and, where appropriate, facilitate the allocation of reused IT equipment through the University of the West of England's IT Equipment Reuse Scheme. This includes evaluating need, eligibility, and the intended use of equipment, to ensure fair and effective redistribution in line with the University's circular economy and sustainability commitments.

The scheme supports UWE's goals to reduce electronic waste, improve digital inclusion, and maximise the lifecycle of IT assets as outlined in our <u>Sustainability Strategy</u>. The information collected helps us manage requests from internal and external organisations which may include students or staff, and may also be used for anonymised reporting, monitoring scheme impact, and improving future processes.

We process this data under the lawful basis of legitimate interest, and in alignment with the University's role as a public body and sustainability leader.

As a data controller we are committed to protecting the privacy and security of your personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (or any successor legislation) and any other legislation directly relating to privacy laws that apply (together "the Data Protection Legislation"). General information on Data Protection law is available from the Information Commissioner's Office (<a href="https://ico.org.uk/">https://ico.org.uk/</a>).

# How do we use your personal data?

We will only process your personal data when the law allows us to. In addition, we will always comply with UWE Bristol's policies and procedures in processing your personal data. Our lawful basis for using your personal data for administering and allocating refurbished IT

equipment through the IT Equipment Reuse Scheme is the performance of a task carried out in the public interest, as part of UWE Bristol's commitment to sustainability, digital inclusion, and resource efficiency. In some cases, we may also rely on legitimate interests to ensure the scheme is delivered fairly and effectively, and to assess need and impact. You can find out more information about lawful bases at the following webpage:

https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/

We will always tell you about the information we wish to collect from you and how we will use it. We will not use your personal data for automated decision-making about you as an individual, nor for profiling that would have a legal or similarly significant effect. However, some of the information provided by or about organisations may be used to assess relative need or community impact, to help us prioritise allocation of devices where demand exceeds supply. This is not considered automated decision-making under UK GDPR, and it does not affect individuals' rights under Article 22.

#### What data do we collect?

Through the <u>IT Equipment Reuse Scheme enquiry form</u>, we collect the following categories of personal and organisational data to process requests for reused IT equipment:

#### For all applicants:

- Organisation or department name
- Name and role of main contact
- Contact email address
- Organisation website
- Organisation registered charity number (optional)
- Country/counties or area the organisation operates in
- Organisation documents that support eligibility (e.g. governance documents, terms of reference etc.)
- Number of employees in the organisation
- Annual income of the organisation
- · Number and type of devices requested
- Whether you have previously received devices from the scheme (optional)

We do not ask for or collect special category personal data (e.g. health, ethnicity) through this form unless voluntarily disclosed by the applicant as part of free-text responses.

## Who do we share your data with?

We may share your data with DTP Group, a third-party contractor engaged by UWE Bristol to support the processing, refurbishment, and distribution of IT equipment through the IT Equipment Reuse Scheme. DTP may use the information you provide to confirm eligibility, clarify technical requirements, coordinate logistics, or ensure that devices are delivered correctly. Where necessary, DTP may contact the main requester directly using the contact details provided.

DTP operates solely within the United Kingdom, and no personal data will be transferred outside the UK or European Economic Area. UWE Bristol has appropriate data processing agreements in place with DTP to ensure that your personal data is handled securely and in accordance with UK data protection legislation.

### How do we keep your data secure?

We take a robust approach to protecting your information with secure electronic and physical storage areas for data with controlled access. Access to your personal data is strictly controlled on a need-to-know basis and data is stored and transmitted securely using methods such as encryption and access controls for physical records where appropriate.

Alongside these technical measures there are comprehensive and effective policies and processes in place to ensure that those who process your personal information are aware of their obligations and responsibilities for the data they have access to.

By default, people are only granted access to the information they require to perform their duties. Mandatory data protection and information security training is provided to staff and expert advice available if needed.

# How long do we keep your data for?

We will only retain your personal data for as long as we need it to carry out the purposes in this notice.

Please see our University Records Management Policy and Records Retention Schedules for more detailed information. These are available by contacting our Data Protection Office at dataprotection@uwe.ac.uk

## Your Rights and how to exercise them

Under the Data Protection legislation, you have the following qualified rights:

- (1) The right to access your personal data held by or on behalf of the University;
- (2) The right to rectification if the information is inaccurate or incomplete;
- (3) The right to restrict processing and/or erasure of your personal data;
- (4) The right to data portability;
- (5) The right to object to processing;
- (6) The right to object to automated decision making and profiling;

(7) The right to complain to the Information Commissioner's Office (ICO).

To protect your privacy and the privacy of others, we will verify your identity before giving effect to your rights. To exercise any of your rights please contact the Data Protection Officer.

#### How to contact us

We will always respond to concerns or queries you may have. If you wish to exercise your rights or have any other general data protection queries, please contact UWE Bristol's Data Protection Officer (dataprotection@uwe.ac.uk).

For further information relation to <u>IT Equipment Reuse Scheme</u> contact: <u>ITReuseScheme@uw.ac.uk</u> or <u>Sustainability@uwe.ac.uk</u>

UWE Bristol
Northhavon House - Frenchay Campus
Coldharbour Lane, Bristol, BS16 1QY

ITReuseScheme@uwe.ac.uk Sustainability@uwe.ac.uk

01179 656261