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## PRIVACY POLICY

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**In relation to the website:  
[www.thehootstudents.com] (“Site”).**

### **Owner**

Open University Students Association (“we/us”).

### **Contact us at:**

**Email:** [oustudents-data-protection@open.ac.uk](mailto:oustudents-data-protection@open.ac.uk)

### **Postal address:**

OU Students Association  
PO Box 397  
Walton Hall  
Milton Keynes  
MK7 6BE

### **Services:**

This website is a sister site of oustudents.com with the primary function of delivering a dynamic website magazine aimed at OU students.

This policy covers data use for thehootstudents.com. For our organisation-wide Privacy Policy please visit the [Data Protection](#) section of our website.

We enable you to influence how your University is run. We exist to promote your interests, link you to other **students**, offer opportunities to get involved, help you find information and news, get help, attend events and access to support services.

When you become an Open University student, you automatically become part of the Open University Students Association.

**(“Services”).**

## Use of Your Data

We take data privacy very seriously. We have set out below the uses to which we will put the information that we have about you in the delivery of the magazine and the legal basis for this, as well as introducing the rights that you have over the way that we use your information.

For the purposes of the UK General Data Protection Regulation (GDPR) and any subsequent UK legislation covering data protection, we are the data controller (the entity which processes your data). All queries relating to this policy and/or data protection more generally should be referred to the Chief Executive of the Students Association at the above address.

The information collected about you might include the following:

### Personal data

- First name
- Last name
- What you're currently studying
- Email (for login)
- Geo-location data (your geographical location based on your IP address)

### ("Personal Data")

### (hereinafter together, "Data")

The Data is collected when you sign up and register for an account on the Site at which point your email address is transferred to MailChimp in order to sign you up to a mail-list designed for site-wide service messages, such as notification of a change to the site's Privacy Policy or an update to the site's functionality.

All Data will be kept private and should you register will be stored on both the WordPress and MailChimp platforms.

We may use the Data that you provide for the following purposes:

- to deal with your enquiry and to provide you with appropriate support which may include sending you further information or liaising with you on a one to one basis, for example about your article submission.
- we may promote our newsletters. Please see our organisation's [Privacy policy](#).

The use of your information for the Purposes is lawful because one or more of the following applies:

- you have given consent to this. You may withdraw consent to these uses at any time either by deregistering on the Hoot's website or by unsubscribing from a site-wide service message about thehootstudents.com (this triggers the manual deregistration process from the Wordpress site) We can also deregister you manually. To request this please email **oustudents-data-protection@open.ac.uk** or write to us at OU Students Association, PO Box 397, Walton Hall, Milton Keynes MK7 6BE and ask to be removed from the Hoot database noting that: (1) this will not affect the lawfulness of processing of your Data prior to your withdrawal of consent being received and actioned;

and (2) if we have asked for your consent to a specific part of the service and you wish to withdraw this consent, you may not be able to partake in some of our services if you do so;

- it is necessary for us to hold and use your Data so that we can perform our obligations under the contract we have entered into with you for the Purpose(s).

## **(“Lawful Uses”).**

### **Transfer to Third Parties**

If you register on the Site your information may be collected and held by **MailChimp**.

Your information may be collected, passed and/or held by MS Forms if you have opted in to permit us to do this or you have registered directly with them.

Use of your data will be subject to each of the above Party’s Privacy Policies.

### **Use of aggregated data:**

Where Data can be aggregated (and anonymised), we may use this without restriction for research purposes (not limited). We are entitled to do this because use of your information for these purposes is for one of the Lawful Uses.

We may also use the Information we gather to notify you about important functionality changes and alterations to the Site. We ensure that any third parties processing your Data on our behalf protect it as carefully as we do and that they provide an adequate level of protection for your rights as a data subject. This may involve transferring your Data to other companies, inside or outside the EEA.

By submitting your Information and subscribing to the Services, you consent to such use and transfer.

Save as provided below, we will not sell, rent, distribute or disclose your Data without your consent or unless required or permitted to do so by law.

### **Storage of Data**

Your information will be stored only for so long as is reasonably necessary in order to carry out the Purpose(s).

### **Your rights**

You have the right to request details of the processing activities that we carry out with your personal information through making a subject access request. Such requests have to be made in writing. More detail about how to make a request and the procedure to be followed can be found on the **ICO’s website**.

You also have the following rights:

- The right to request rectification of information that is inaccurate or out of date;
- The right to erasure of your information (known as the “**right to be forgotten**”);
- The right to object to the way in which we are dealing and using your Data;
- The right to restrict the processing of your Data;

- The right to request that your information be provided to you in a format that is secure and suitable for re-use (known as the **right to portability**).

All of these rights are subject to certain safeguards and exemptions, more details of which can be found on the **ICO's webpage**. To exercise any of these rights, you should contact the Chief Executive of the Students Association at the above email or postal address.

If you are not happy about the way in which we have processed or dealt with your information, you may wish to contact our Data Protection Officer whose contact details can be found [here](#); or file a complaint with **Information Commissioners' Office**.

More detail about how you may do so **can be found here**.

We have appointed DataRep as the Data Protection Representative to act as a direct contact for members residing in the EU in relation to compliance with the EU GDPR. They have locations in each of the 27 EU countries and Norway and Iceland in the European Economic Area (EEA). Contact details and more information can be found [here](#).

## **International Transfers of Data**

We may send your information outside of the UK. We do this because your Data may be stored on servers based outside the UK. However, we meet our obligations under the relevant legislation by ensuring that the information has the same protection as if it were being held within the UK. We do this by ensuring appropriate safeguards are in place and that any third parties processing your Data outside the UK have been assessed using a transfer risk assessment.

## **Security of Your Data**

The Site is hosted by WordPress.com who have servers outside the EEA. The Site uses a security system that protects your information from unauthorised use. However, as no data transmissions over the internet can be guaranteed to be one hundred percent secure, we cannot ensure or warrant the security of any information you transmit to us and you do so at your own risk.

## **Updating your Information**

If any of the information you provide when registering for the Site changes, please edit your profile settings after logging in or alternatively, please notify **oustudents-data-protection@open.ac.uk**.

## **Accessing your Information**

We are data controllers for the purposes of the Act and if you wish to request access to your Information held by us, you may contact **oustudents-data-protection@open.ac.uk**.

## Service Messages

If you register on the website and at any time you wish to stop receiving service messages about thehootstudents.com you will need to either unsubscribe, deregister from the Site or contact [oustudents-data-protection@open.ac.uk](mailto:oustudents-data-protection@open.ac.uk).

## Surveys and user groups

We always aim to improve the services we offer. As a result, we may canvass our users using surveys tools e.g. [Microsoft Forms](#). Participation in surveys is voluntary, and you are under no obligation to reply to any survey you might receive from us. Should you choose to do so, we will treat the information you provide with the same high standard of care as all other customer information.

## Competitions

We may occasionally run competitions on the Site. Entry to said competitions is voluntary, and you are under no obligation to enter. Should you choose to enter a competition, we will treat the information you provide with the same high standard of care as all other customer information, and use the information provided strictly within the entry terms of the competition and the OU Students Association's [Privacy Policy](#).

## Links to third parties' sites

Please note that we may provide links to other sites, which may not be governed by the OU Students Association's Privacy Policy or this Privacy Policy and you should view the privacy policy of those sites for further information.

## Traffic Patterns/Site Statistics

We may monitor customer traffic patterns, Site usage and related Site information in order to optimise your use of the Site and we may give aggregated statistics to a reputable third-party, but these statistics will include no information personally identifying you.

We use Google Analytics to monitor site usage, including some of Google's Advertising features to better understand our user's needs and interests. You can opt out of these here: <https://tools.google.com/dlpage/gaoptout/>

The data collected includes the following:

- Details of specific webpages visited within the Site and actions taken on those webpages
- Details of devices used to visit/view the Site
- Actions taken within the Site

## Cookies

In addition to the Information which you supply to us, information and data may be automatically collected through the use of cookies. Cookies are small text files the Site can use to recognise repeat users and allow us to observe behaviour and compile aggregate data in order to improve the Site for you. For example, cookies may be able

to tell us whether you viewed the Site with sound or with text on your last visit. Cookies also allow us to count the number of unique and return visitors to our Site.

Cookies may be either “persistent” cookies or “session” cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

The table below explains the cookies our webhost WordPress.com regularly uses and why.

In addition to the cookies set on wordpress.com sites, the [Site Stats](#) feature is used. This tallies the unique numbers of visitors to a site, as well as the number from specific geographic locations. A visitor is counted when we see a user or browser is seen for the first time in a given period.

Cookie	Purpose
ads	Tracks if a visitor has clicked an ad before.
wordpress_eli	Reduces the display of ads for repeat visitors.

__pdvt	Used in log of Crowdsignal survey data to aid in debugging customer problems
ab	Used for “AB testing” of new features.
nux_flow_name	Identifies which user signup flow was shown to the user.
tk_ni / tk_ai / tk_qs	Gathers information for our own, first party analytics tool about how our services are used. A collection of internal metrics for user activity, used to improve user experience.

tk_*r	Referral cookies used to analyse referrer behaviour for Jetpack connected sites using WooCommerce.
wp-affiliate-tracker	Remembers the ID of the affiliate that referred the current user to WordPress.com
utma / utmb / utmc / utmt / utmz / ga / gat / gid	Google Analytics. Gathers information that helps us understand how visitors interact with our website, which allows us to create a better experience for our visitors.

akm_mobile	Stores whether a user has chosen to view the mobile version of a website.
botdlang	Used to track the language a user has selected to view popular blogs in.
pd_dashboard	Records last used folder in Crowdsignal dashboard so it can be reopened upon user's next visit.
PD_USER_AUTH	Login cookie used to identify Crowdsignal user.
wordpress_logged_in*	Checks whether or not the current visitor is a logged in WordPress.com user.
wp-settings-{user_id}	Persists a user's wp-admin configuration.
wp_sharing_{id}	Tracks whether or not a user has already performed an action.

PHPSESSID	Cookie generated by applications based on the PHP language. This is a general purpose identifier used to maintain user session variables. It allows a user to maintain a logged-in status between pages.
mc_cid / mc_eid / mc_landing_site	These cookies allow users' data to be used by our email service, MailChimp.
jetpack_sso_nonce / jetpack_sso_redirect_to / jetpack_sso_original_request	Jetpack allows us to customise the Site with free themes, image tools, and rich content, increases traffic by allowing social sharing, related content, and faster load times. It allows us to have a safer, stronger site.
country_code	Used in order to determine whether or not the cookie banner should be shown. Set immediately on page load and retained for 6 hours to remember the visitor's country.
sensitive_pixel_option	Remembers the state of visitor acceptance to the cookie banner. Only set when the visitor clicks Accept.
twostep_auth	Set when the user is logged in using two factor authentication.
wordpress_test_cookie	Checks if cookies are enabled to provide appropriate user experience.
quads_browser_width	Stores browser width
<a href="#">Google Analytics</a> cookies, set a first-party cookie in order to anonymously	View the full list of cookie names on the <a href="#">Google Analytics</a> website. Non-essential cookie to help



identify when users return to a website.	us track site usage and make improvements to user experience.
bp-activity-oldestpage	On the default's theme Activity page, rather than the list of activity being paginated, it has a "load more" button. The "bp-activity-oldestpage" cookie remembers what page of activity the "load more" is on.

If you are not registered on the site and do not wish to receive cookies from us or any other website, you can turn cookies off on your web browser: please follow your browser provider's instructions in order to do so. Unfortunately, we cannot accept liability for any malfunctioning of your PC or its installed web browser as a result of any attempt to turn off cookies.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit

**[www.aboutcookies.org](http://www.aboutcookies.org), [www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.civicuk.com/cookie-control/browser-settings](http://www.civicuk.com/cookie-control/browser-settings).**

It is important to remember that our Site and/or use of our Services may not function properly if your cookies are disabled. For example, if we begin to tailor the content to your interests as expressed by your browsing behaviour this depends on cookies. If you have declined cookies then this kind of service will not be available to you.

### **Additional Plugins**

WordPress Plugins are applications which add additional functionality and features to a site. The Hoot uses several Plugins which have their own policies and rationale for Cookies. A list of Plugins used by the site can be obtained by contacting [oustudents-data-protection@open.ac.uk](mailto:oustudents-data-protection@open.ac.uk).

## **Amendments to this Privacy Policy**

We may occasionally make modifications to this Privacy Policy ("Variations") and, if the Variations are significant, will endeavour to give you prior notification (including, for certain services, email notification of Privacy Policy Variations). Variations become effective immediately upon posting to the Site and by continuing to use the Site, you will be deemed to accept any such Variations.

We also keep prior versions of the Privacy Policy in an archive, which are available for you to review upon email request to us at [oustudents-data-protection@open.ac.uk](mailto:oustudents-data-protection@open.ac.uk).

Privacy Policy, version [1.3] (updated July 2023).