

Privacy Notice Maintenance Procedure

1. Scope of the Procedure

1.1 Purpose of the Procedure

Compliance with this procedure is required to ensure the University's compliance with data protection law and particularly the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 ("the UK GDPR"), which give data subjects the right to be informed on how the University processes their personal data. Failure to comply with this legislation can result in financial penalties being levied against the University.

This procedure should be read in conjunction with the Privacy Policy.

1.2 What is covered by the Procedure

This procedure must be followed when staff identify that the privacy notices require amendment to reflect changes in how personal data is processed.

1.3 Who is covered by the Procedure

All staff who process personal data on behalf of the University must familiarise themselves with this procedure and comply with it when processing personal data and in particular when considering changes to how personal data is processed.

Failure to comply with the procedure will be dealt with in accordance with the Privacy Policy and may involve disciplinary action.

2. Detailed Procedures Statement

2.1 Where a University employee identifies a requirement for personal data to be processed in a way which is not permitted by the current relevant privacy notice, they will notify the Data Protection Officer at dp_officer@aston.ac.uk as soon as the need is identified.

2.2 The Data Protection Officer (or their nominee) will determine and explain the lawful basis for the new processing activity is lawful and whether a data sharing agreement with a third party is required.

2.3 The Data Protection Officer (or their nominee) will amend the privacy notice in consultation with the privacy notice owner and will arrange for the revised version to be published.

2.4 The new processing must not commence until the revised privacy notice has been implemented.

3. Version Control

Reference No.	Version	Executive Sponsor	Officer Responsible	Consultation Process	Effective Date
PNMP001	1	Chief Operating Officer	General Counsel	Information Security & Compliance Group	February 2021