



February 2019

Group Privacy Director

Data Protection – Right of Erasure

Global University Systems (hereafter "GUS") is committed to a policy of compliance with Data Protection laws and the rights of data subjects. This guidance describes how data subjects can request GUS rectifies personal data processed by GUS. This policy is to be read in addition to The Conditions of use, Acceptable Use Policy, Information Security Policy and the Data Protection Policy.

Request for erasure criteria

The right to erasure does not provide an absolute 'right to be forgotten'. Individuals have a right to have personal data erased and to prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
- When the individual withdraws consent
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- The personal data has to be erased in order to comply with a legal obligation
- The personal data is processed in relation to the offer of information society services to a child

GUS will refuse to comply with a request for erasure where the personal data is processed for the following reasons:

- to exercise the right of freedom of expression and information
- to comply with a legal obligation for the performance of a public interest task or exercise of official authority
- for public health purposes in the public interest
- archiving purposes in the public interest, scientific research historical research or statistical purposes
- the exercise or defence of legal claims

If GUS has disclosed the personal data in question to third parties, GUS will inform them about the erasure of the personal data, unless it is impossible or involves disproportionate effort to do so.

Information required and procedure for responding to a request for erasure

Individuals wishing to have personal data erased by GUS under the Data Protection Act can send a request to:

Data Protection Officer

30 Holborn, London

London

EC1N 2LX

Or by email to: dataprotection@gus.global

The personal data to be erased should be clearly identified. GUS may require confirmation of the identity of the data subject and/or the person making the request. GUS will respond to requests within one month of receipt of the submitted request (provided sufficient information has been given to GUS to enable GUS to process the request). If your request is complex GUS may require up to an additional two months to complete the request. If this is the case GUS will inform you how much additional time is needed and the reasons why within the first month.

Right of Appeal

If you are dissatisfied with the outcome of the request, you have a right of appeal to the Information Commissioner's Office. Details follow for ease of reference.

By Post: Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

By Telephone: 01625 545 700

Via the Website: www.ico.org.uk