

## **Reach Out CPD Newsletter Privacy Notice**

Imperial College London (“we” or “Imperial”) provide various newsletters via email about our activities, services and achievements. This privacy notice explains how we use your personal data when you sign up to receive the Reach Out CPD newsletter (the “Newsletter”).

We will collect the majority of data from you directly where you engage with our services, request we do something or where you sign up to take part. Also, if you signed up to receive the Newsletter via Twig/Imagine Learning, data will have been shared between Twig/Imagine Learning and Imperial when it transferred the data base from Twig/Imagine Learning to Imperial to administer.

### **Why we process your information**

If you opt-in to receiving the Newsletter, we will ask for your:

- first and last name
- email address
- school name

Our legal basis for processing your personal data for the purposes of sending you the Newsletter via email is based on your consent - by consenting to receiving the Newsletter via email you are giving us permission to process your personal data specifically for the purpose of sending you the Newsletter via email.

### **Sharing your personal information**

We may share your personal data with service providers who assist Imperial in the preparation, distribution and/or administration related to the Newsletter. Our legal basis for sharing your data in this way is that it is necessary for our legitimate interest in providing you with the Newsletter.

All our service providers are required to take appropriate security measures to protect your personal information in line with data protection laws. We do not allow our service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Some service providers may process your personal information outside the European Economic Area. Where this is the case, you can expect a similar degree of protection in respect of your personal information and your personal information will only be transferred where the transfer is permitted under the law.

For example, we currently use:

- Data Harvesting Student CRM (whose legal name is Global Data Management UK Limited) is an event management and customer relationship management (CRM) database services that assist us with the email distribution of the Newsletter to our subscribers. We share subscribers’ names and email address with Data Harvesting Student CRM for these purposes. Data Harvesting Student CRM’s software is hosted on

their cloud platform in England and the data itself is stored in England, with uploaded files and backups stored in England, Ireland and Amsterdam. As data is stored in the European Economic Area, it is in full compliance with the Data Protection Act 2018. Data Harvesting Student CRM is limited and registered in England and listed with the UK's Information Commissioner's Office.

- MailChimp (whose legal name is The Rocket Science Group LLC) who provide mailing list tools that assist us with the email distribution of the Newsletter to our subscribers. We share subscribers' names and email address with MailChimp for these purposes. MailChimp's servers and offices are located in the United States, so your information may be transferred to, stored, or processed in the United States. MailChimp and Imperial utilise Standard Contract Clauses and associated checks to ensure data is transferred and securely stored.
- Microsoft provide us a signup form that assists us with collecting user interest. Our contract with Microsoft ensures that data is only held in the EU. More information on Microsoft data storage can be found [here](#); Microsoft Privacy - Where Data Is Stored and Located.
- Airtable is a system we use to email certificates to users who complete the course. Airtable is hosted within AWS. Airtable's EU data centre is located in Frankfurt, Germany. Customer data is backed up in different availability zones within the Frankfurt data centre and in a separate AWS data centre in Ireland. More information on Airtable's data residency can be found [here](#).

Except as explained above, we will not share your information with anyone, unless where required by law, where it is necessary to administer our relationship with you or where we have another legitimate interest in doing so.

### **Keeping your personal information**

Your personal information will be deleted from our systems when you unsubscribe from the Newsletter.

### **Your rights**

You have the right to:

- receive a copy of the information we hold about you in a reasonable format specified by you, including for the purpose of transferring that data to another data controller;
- request us to erase your personal data or object to our processing of your personal data;
- request your information be changed if you believe it was not correct at the time you provided it;
- unsubscribe and have your information deleted if you no longer want to receive the Newsletter.

Please note that where request for erasure or unsubscribing occur, certain information will be retained for the purposes of managing a dedicated suppression list to prevent contact from recommencing.

If you are not satisfied with how we are processing your personal data, you can raise a concern with the Information Commissioner: [www.ico.org.uk](http://www.ico.org.uk)

If you have any concerns with regard to the way your personal data is being processed or have a query with regard to this information, please contact our Data Protection Officer at:

Imperial College London  
Data Protection Officer  
e-mail: [dpo@imperial.ac.uk](mailto:dpo@imperial.ac.uk)

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