

CANCER AT IMPERIAL USE OF WORKPLACE PREMIUM PRIVACY NOTICE

What is the purpose of this document?

Imperial College of Science, Technology and Medicine (the “**College**” or “**Imperial**”) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the applicable data protection legislation the Data Protection Act 2018 and the General Data Protection Regulations (the “**GDPR**”) and the College’s *Data Protection Policy*.

The College is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to **all members of the Cancer at Imperial Workplace Premium platform**. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information as well as the Workplace Premium *Privacy Notice* due to the platform being a separate organisation to the College

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level

of protection.

We may collect, store, and use the following categories of personal information about you where you have provided it:

- Professional contact details such as name, title, work address and work telephone number
- A summary of your research, research interests and publications
- Start date of contract with Imperial
- Location of employment or workplace
- Information about your use of Workplace Premium
- Photographs

For the Workplace App, which is optional, the following additional categories of personal information may be collected, depending on the Settings and/or Security applications of your mobile device:

- Phone status and identity
- Audio
- Approximate location
- Contact list

If your mobile device is supported by Android 6.0 or above, you can turn these permissions off within the Settings application of your mobile device. As of August 1, 2018, Google requires apps to comply with Android 8.0 or later security features. App updates are required to do the same as of November 1, 2018.

How is your personal information collected?

We collect your name and work e-mail from your line manager and/or Divisional and Departmental Manager and/or the Imperial Address List. Access to the system is then offered to you by invitation to join Workplace Premium via your College email. Any additional information entered into Workplace is provided by you directly.

How we will use information about you and the legal basis for processing your data under the GDPR

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you or in order to take

steps at your request prior to the entry into a contract.

2. Where we need to comply with a legal obligation.

3. Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

Situations in which we will use your personal information

We need all the categories of information in the list above (see The kind of information we hold about you) primarily to allow us to perform our contract with you and to enable us to comply with our obligations to provide you with the information and tools to connect, communicate and collaborate as cancer researchers.

- To provide you with the information and services that are relevant to the Groups that you select on Workplace Premium.
- To conduct data analytics to measure the success of Workplace Premium as a communication and collaboration tool for networking and engagement.
- To ensure the information the College holds about your research activities is up to date and accurate.
- To provide you with relevant news by email and app (if installed) where you have consented to receive this information.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Change of purpose

We will only use your personal information for the purposes for which we collected it. If we need to use your personal information for another purpose, we will contact you and we will explain the legal basis which allows us to do so and give you an option to opt out.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Automated decision-making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Data sharing

Any data entered into Workplace Premium is covered by the CANCER AT IMPERIAL USE OF WORKPLACE PRIVACY NOTICE and the Workplace [Premium Privacy Notice](#).

No data will be shared beyond processing by Workplace Premium for the above purposes. No other third parties outside of the College will receive the data.

Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law or where it is necessary to administer the relationship between you and the College and will be covered by additional notice information, most commonly the [Privacy Notice for Staff and Prospective Staff](#)

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within the College group. It will also include Workplace Premium itself whereby Workplace Premium provides the communication solution covered by this privacy notice and any interaction with this service via College email will use Microsoft in its provision of Office 365.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the College group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party 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.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business and operations of the College. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data security

<p>We have put in place measures to protect the security of your information.</p> <p>Third parties will only process your personal information on our instructions and/or where they have agreed to treat the information confidentially and to keep it secure.</p>

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

When your contract with Imperial ends, your personal Workplace Premium account will be Deactivated and your personal information will be retained on the Cancer at Imperial instance of Workplace Premium for the duration that the Cancer at Imperial account remains open. Full deletion of your personal information is possible at your specific and individual request (see section on rights of access, correction, erasure, and restriction below).

Deactivating a Workplace Premium account means that:

- Posts, comments and messages you made before the deactivation will still be available to co-workers. This means group and event conversations won't be disrupted and content that is dependent on the deleted account is preserved.
- You will be logged out of every Workplace session and prevented from accessing Workplace.

Your Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. Workplace Premium Administrators cannot download personal information on your behalf, but they can enable you to directly download a copy of your own data. You can download a copy of your information at any time. You can download all of it at once, or you can select only the types of information and date ranges you want. To download a copy of your personal information from Workplace Premium, go to your General Account Settings and select 'Download a copy of your Workplace data'.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. You can request your Workplace Premium account and associated personal information with that account to be deleted at any point. When a request for erasure is made:

- Your co-workers will no longer be able to see your account on Workplace.
- It may take up to 90 days for all of the things you have posted to be deleted, like photos, posts or other data stored in backup systems.
- Any content from other users that is dependent on your content (example: comments on the deleted users' posts) will also be deleted.
- While Workplace is deleting this information, it will be inaccessible to other people using Workplace.
- Some of the things people do on Workplace are not stored in their accounts. For example, a co-worker may still have messages from you even after your account is deleted.

Should you wish to delete your Workplace Premium account and all personal information associated with that account, you must contact your System Administrator in the CRUK Imperial Centre who will carry out this request for you.

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the College's Data Protection Officer in writing, or contact the System Administrator in the CRUK Imperial Centre

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the

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right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the College's Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Officer

We have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer at:

Imperial College London
Data Protection Officer
Exhibition Road
Faculty Building Level 4
London SW7 2AZ

e-mail: dpo@imperial.ac.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.