

## **Privacy Notice**

### **What is the purpose of this document?**

Imperial College London is committed to protecting the privacy and security of your personal information. This privacy notice describes how ECRI collects and uses your personal information, before, 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 University's Data Protection Policy.

Imperial College London 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 any ECRI stakeholder who engages with ECRI provision. This may be workshops, courses, online learning, events, residential programmes (national and international), mock interviews and 1-2-1s. 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.

### **Data Protection Principles**

ECRI 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.

### **What 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.

When you sign up to attend or participate in ECRI provision (as set out below), we may collect, store, use and transfer the following information about you:

- Personal contact details such as name, title, addresses, telephone numbers and personal email addresses.
- Information relating to your academic programme of study at Imperial.
- Your CID
- Your primary location of employment or study at Imperial
- Job title and Department
- Your date of birth
- Your next of kin and emergency contact information
- Dietary restrictions you have in place to support your attendance at residential workshops
- Your bank account details for expenses reimbursement
- Your image through photographs and video and audio through workshop, course or event recordings
- Your biography or other personal information you wish to share with us to allow you to engage in ECRI provision, such as coaching, mentoring, mock interviews, 1-2-1s and applications for Associate Membership of the HEA
- Your professional body membership details (level and number)

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Your gender
- Your race and ethnicity
- Information about your accessibility needs and/or information about your health including medical conditions.

### **How is your personal information collected?**

ECRI will collect personal information about you through workshop/course booking and evaluation processes, email and hard copy documentation. For students at Imperial, ECRI receives data about you from Imperial's student records system. For staff at Imperial, ECRI receives data about you from Imperial's staff records system, ICIS.

### **How does ECRI use the 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, where we do capture your personal data we will use it in the following circumstances:

1. When we need to comply with a legal obligation
2. Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority invested in us.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. Where it is necessary in order for us to deliver the provision you have agreed to participate in.
5. Where it is necessary in order to protect your vital interests or someone else's vital interests.

### **Situations in which we will use your personal information**

ECRI needs all the categories of information in the list above (see what kind of information we hold about you) so that we can administer the provision we have agreed to provide you with. The situations in which we will process your personal information are listed below.

- To provide you with the services that you request from us
- To provide external venues with information about you to ensure you can fully participate in our provision away from Imperial.
- To determine whether to engage your services as a casual worker or through other means of employment.
- To comply with any health and safety obligations.
- To provide you with relevant news and information pertinent to your experience at Imperial.
- To share details of your training and development records with your department

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

### **If you fail to provide personal information**

If you fail to provide certain information when requested, we may not be able to meet your specific requirements and we may be prevented from delivering our services to you.

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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.

### **How we use particularly sensitive personal information**

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where it is necessary in the context of employment law, or laws relating to social security and social protection.
3. Where the processing is necessary to protect your vital interests (or those of another person) where you are incapable of giving consent.
4. Where the processing is carried out in the course of our legitimate activities as a charity, with respect to our own members, former members, or persons with whom we have regular contact in connection with our purposes.
5. Where the processing relates to personal data which have been manifestly made public by you.
6. Where the processing is necessary for the establishment, exercise or defence of legal claims, or for courts acting in their judicial capacity.
7. Where the processing is necessary for reasons of substantial public interest, and occurs on the basis of a law that is, inter alia, proportionate to the aim pursued and protects your rights as a data subject.
8. Where the processing is required for the purpose of medical treatment undertaken by health professionals, including assessing the working capacity of employees and the management of health or social care systems and services.

9. Where the processing is necessary for reasons of public interest in the area of public health (e.g. ensuring the safety of medicinal products).
10. Where the processing is necessary for archiving purposes in the public interest, for historical, scientific, research or statistical purposes, subject to appropriate safeguards

ECRI will use your particularly sensitive personal information in the following ways:

- To try and meet your needs and specific requests when attending our provision – in particular, residential programmes (national and international) and events
- When arranging and evaluating mock interviews and 1-2-1s

### **Do we need your consent?**

We do not need your consent to process personal and sensitive information you have declared to us for the purpose of engaging with our provision. In limited circumstances, such as in mock interviews or 1-2-1s, we may approach you for your written consent to allow us to process certain particularly sensitive data and to ask for your consent to share the data you have declared to us with mock interview panels (who are usually, but not exclusively members of Imperial). If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

### **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**

We may have to share your data with third parties, including third-party service providers and other entities in the Imperial group. We require third parties to respect the security of your data and to treat it in accordance with the law. We may transfer your personal information outside the EU if you are attending one of our international residential programmes. Where this is the case, you can expect a similar degree of protection in respect of your personal information.

### **Why might you share my personal information with third parties?**

We may share your personal information with third parties where required by law, where it is necessary to administer our relationship with you, or where we have a legitimate interest in doing so, such as for external venues which host our residential programmes.

### **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 Imperial group, external venues which host our residential programmes and international partners with whom we deliver our Global Fellows Programmes. Other third parties who we may share your personal information with include AdvanceHE (for applications for Associate Fellowship of the HEA) and professional bodies who are part of the MARS programme.

### **How secure is my information with third-party service providers and other entities in the Imperial 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.

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 Imperial. We may also need to share your personal information with a regulator or to otherwise comply with the law.

If you are participating in a Global Fellows Programme, we may transfer the personal information we collect about you to countries outside the European Economic Area where the programme is being hosted. Not all countries outside the EEA have the same level of protection with regards to your personal data, nor can we ensure the security of your data which may be shared with these countries. We will ask you to confirm your understanding of this before you decide to participate in a Global Fellows Programme.

However, to ensure that your personal information does receive an adequate level of protection, we have put in place the following appropriate measure to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection:

- All files containing your personal information will be password protected with passwords sent separately.

### **Data security**

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

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 ECRI use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Details of retention periods for different records Imperial holds are available in the [\*retention policy\*](#).

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

ECRI will hold personal information about you in relation to participating in our courses, workshops, coaching, mock interviews and 1-2-1s for two years. After two years, we will delete personal information we hold about you. If we keep data for longer periods, we will anonymise this.

For Graduate Teaching Assistants wishing to apply for Associate Fellowship of the HEA, or student participating in MARS, we will hold your data for 5 years. After five years, we will delete personal information we hold about you.

When you submit to us your feedback/evaluation on our provision, we will hold any personal information about you declared through this for a period of three years. After which, it will be anonymised.

## **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.
- **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. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **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.

### **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 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](mailto: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.

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By:	ECRI People, Culture and Operations Group