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USE AND DEVELOPMENT OF ARTIFICIAL INTELLIGENCE - PRIVACY NOTICE ADDENDUM

About this document

This Privacy Notice Addendum (the Addendum) is to be used in addition to the full Privacy Notice provided to you. This Addendum explains how, in conjunction with associated Privacy Notices (see below), Imperial College of Science, Technology and Medicine (the university, Imperial, we, our, us) processes the personal data of a data subject as part of the use of university approved artificial intelligence (AI) activities, and explains your rights in relation to those activities.

This Addendum focuses only on; aspects of AI system development, the use of AI tools and applications, the use and input of data into AI systems and specific processes, and should therefore be read in line with Imperial Privacy Notices, including the following;

- [Privacy Notice for Staff and Prospective Staff](#) [PDF]
- [Student Recruitment and Marketing Privacy Notice](#) [URL]
- [Privacy Notice for Students and Prospective Students](#) [PDF]
- [Privacy Notice for Outreach](#) [URL]

A full list of Imperial's Privacy Notices can be found here: [Imperial Privacy Notices](#) [URL]

Key Definitions

Key term	Definition
AI system development	The process of designing, building, testing, training, and deploying artificial intelligence systems
AI system	A machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments
dAIsy	Imperial's AI platform, designed to give safe, easy access to multiple generative AI models (such as GPT, Claude, DeepSeek, and others) through a single interface
Deployer	A natural or legal person, public authority, agency or other body using an AI system under its authority except where the AI system is used in the course of a personal non-professional activity
Distributor	A natural or legal person in the supply chain, other than the provider or the importer, that makes an AI system available
Downstream provider	A provider of an AI system, including a general-purpose AI system, which integrates an AI model, regardless of whether the AI model is provided by themselves and vertically integrated or provided by another entity based on contractual relations
General-purpose AI model	An AI model that is trained with a large amount of data using self-supervision at scale, that displays significant generality and is capable of competently performing a wide range of distinct tasks and that can be integrated into a variety of downstream systems or applications. This does not include AI models that are used for research, development or prototyping activities before they are placed on the market

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General-purpose AI system	An AI system which is based on a general-purpose AI model and which has the capability to serve a variety of purposes, both for direct use as well as for integration in other AI systems
Input	Data provided to or directly acquired by an AI system on the basis of which the system produces an output
Operator	A provider, product manufacturer, deployer, authorised representative, importer or distributor
Performance of the/an AI system	The ability of an AI system to achieve its intended purpose
Provider	A natural or legal person, public authority, agency or other body that develops an AI system or a general-purpose AI model or that has an AI system or a general-purpose AI model developed and places it on the market or puts the AI system into service under its own name or trademark, whether for payment or free of charge
Risk	The combination of the probability of an occurrence of harm and the severity of that harm
Training data	Data used for training an AI system through fitting its learnable parameters

What categories of personal data do we collect?

We may collect, process, and input the following categories of personal data:

- Contact and communication information, including:
 - Your contact details (including email address(es), telephone number(s) and postal address(es));
 - Records of communications and interactions we have had with you;
- Biographical, educational, professional and social information, including:
 - Your name, title, gender, nationality and date of birth;
 - Details of your education history, professional development and experience plus references from any previous institutions you attended;
 - Lifestyle information and social circumstances;
 - Your interests and extra-curricular activities;
- Work related information, including:
 - Details of your work history and references from your previous employer(s);
 - Your personal data captured in the work product(s) you create while employed by or otherwise engaged to work for Imperial;
 - Communications sent or received using Imperial's communication systems;
 - Details of your professional activities and interests;
- Financial and transactional data
 - Bank account details to be able to pay you
 - Card details to collect payment for services you have requested
 - Details regarding payments you have made to us
 - Details regarding services you have purchased from us

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We may also collect, store and process the following "special categories" of more sensitive personal data where it forms part of the proposed activity directly:

- Information about your race or ethnicity, religious beliefs, sexual orientation.
- Information about your health, including any medical condition, health and sickness records .

The legal basis for processing your personal data, how we use your personal data and with whom we share it

It is intended that our legal basis and reasons for processing your personal data will not change because we use AI. Though we may use an additional legal basis specifically for the purposes where AI is involved in the processing your personal data. Therefore, this notice is to be viewed in addition to our standard Privacy Notices, examples of key Privacy Notices are listed at the beginning of this document.

We may process your personal data either in ways you have consented to, or because it is otherwise necessary for another legal basis as set out below:

- **Legitimate Interests**

We may process your personal data because it is necessary for our, or a third party's legitimate interests. Our "legitimate interests" include our interests in running the university in a professional and sustainable manner, in accordance with all relevant legal and regulatory requirements. In this respect, for the purposes of AI integration, we may use your personal data for the following:

- For the planning, design and development of AI based activities in order to undertake testing (in real world conditions or contained), research and planning and to ensure any AI integration is correctly managed in line with legal and ethical standards.
- To monitor the use of AI efficiency within activities undertaken by the university to ensure where AI is used, it is done so in a fair, transparent and effective manner which improves upon previous processes where AI was not used before.

- **Legal obligations and public task**

As a provider of higher education, the university is in certain respects a public authority. Your data may also be processed by the university using a university approved general-purpose AI system for compliance with legal obligations or as part of the university's public task. An example would be as follows:

- Subject to legal and ethical safeguards for public interest archiving, scientific and historical research or statistical analysis (we will not use your name or other identifying details except when relevant and necessary)

- **Consent**

Your personal data may also be processed by Imperial, using a university approved general purpose AI system, where we have your consent.

Where applicable, consent will always be specific and informed on your part, and the consequences of consenting or not, or of withdrawing consent, will be made clear.

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Practical AI uses for students and staff

Personal data may be processed to:

- Improve efficiency, quality, and speed of administrative and educational tasks. Specific examples may include:
 - Cohort management
 - Lesson planning
 - Engagement analytics
- Support learning and safeguarding, but always with human oversight to protect individual rights. Specific examples may include:
 - Giving immediate feedback to students by marking answers to predetermined questions
 - Adapting questions via an AI Learning Management System (LMS) to individual student needs
- Review documentation and provide the user advice and feedback. Specific examples may include;
 - Reviewing student work to provide feedback, identify trends and initiate support to staff as part of their administrative tasks
 - Reviewing applications and support documentation for the purpose of filtering and advising the user in relation to the suitability of individuals to attend and / or be considered for roles or courses.

Imperial, acting as a provider or deployer, may employ different AI tools for the purposes of undertaking different tasks including:

Generative AI: Assists staff with administrative tasks to generate content such as;

- Drafting letters,
- Creating lesson plans, or
- Generating reports, text and images.

Predictive AI: Analyses data to;

- Identify students at risk of falling behind academically, enabling early intervention and tailored support.
- Review UCAS and direct applications and supporting documentation. Extracting pertinent information to aid assessment, make predictions about on course performance, support grading consistency and identify patterns in gaps in learning.
- Review applications and supporting documentation. Searching role specific terms, identifying qualifications and comparing skillsets to job descriptions

Adaptive Learning Systems/Learning Management Systems: AI platforms that can adjust educational content to match individual learning styles and progress, providing personalised learning experiences.

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Automated Administrative Tools: AI automates routine tasks like scheduling, note taking in meetings, grading, and managing timetables.

Conversational AI: the use of technologies like chatbots or virtual agents utilises natural language processing to receive, consider and process different data types, to then respond in a natural, human-like way. Examples of this include;

- Provide initial student / staff support through conversational AI
- Assist personnel with searches, provide answers and / or assist with specific tasks

AI Training Models

For all centrally supported AI tools, including MS Copilot and agents found in dAlsy, all prompts and responses are not used to train any external AI models.

dAlsy is provided within Imperial's secure infrastructure. Usage is overseen at a platform level to maintain security, compliance, and service sustainability.

For departmentally supported and maintained AI Tools, these will be explained to you on a case by case basis to ensure you fully understand the need, uses and implications of your involvement and/or inclusion.

Data Sharing and use of Third-Party Service Providers

Third-Party Service Providers

"Third parties" include operators and distributors who provide services to the university. Third parties may be involved in the sourcing, development and integration of AI platforms, tools and applications.

Data Sharing and Transfers

The university will, where necessary, disclose personal data to third parties, or allow personal data to be stored or handled, in countries outside the UK where such AI services are not locally based. Where this occurs, the university will ensure data will only be transferred when one of the following is in place:

- Where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. data transfer assessments and standard data protection contract clauses adopted by the European Commission and UK Government respectively).
- A UK adequacy decision has been awarded for that country or territory which has determined the destination country has adequate levels of protection in place; or
- There exists another situation where the transfer is permitted under applicable law (for example, where we have your explicit consent or an exception applies).

The university, with appropriate contracts in place, may share personal data with a "downstream provider". A downstream provider may use a general-purpose AI system in the processing of personal data. Where this is the case and where the university is aware of such, the university will inform you and the downstream provider should provide you with the appropriate information before undertaking any processing of personal data.

Use of university 'approved' AI tools

For a complete list of university approved AI tools, please contact The Information and Communication Technologies division.

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Any use of university approved AI tools should be made in line with all relevant Policies, guidance and the University Regulations.

Oversight and Due Diligence

Before personal data, which the University is responsible for, is used in university approved AI tools, it may be necessary to first undertake a risk assessment review which is completed within the university Data Activity Risk-assessment Tool // www.imperial.ac.uk/dart

Please liaise with the University Data Protection Officer // data-protection@imperial.ac.uk or your Department Lead // [Department Lead and Data Protection Advisors List](#) [URL] to understand if the use of personal data is conditional on a DART entry being completed.

Automated decision-making

Whilst the use of AI has the potential to provide trends, feedback, decision-based outputs etc. the university has, in line with your rights to not be subjected to decisions based solely on automated processing, put in place the following additional protections:

- Human oversight: We ensure there is always meaningful human involvement in any significant decision-making process. AI tools are used to assist staff, not to replace their professional judgment.
- Your right to challenge: If an AI tool is used to help make a decision that affects you, you have the right to request human intervention, express your views, and challenge the decision.

If at any time the above does not / cannot occur, then we will notify you prior to any data processing being undertaken along with confirming your rights and opportunities to withdrawal or challenge the decision-making process.

Anonymisation

Your personal information may be anonymised into statistical or aggregated data in such a way that ensures that you can no longer be identified from it. Anonymised data cannot, by definition, be linked back to you as an individual and may be used to conduct research and analysis, including the preparation of statistics for use in our reports.

Change of purpose

We will only use your personal data 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 data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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