VOLUNTEER 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 General Data Protection Regulations (the “GDPR”) and the Data Protection Act 2018) 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 people recruited or applying to be recruited by the College to volunteer to help in the organisation and delivery of specified events or programmes. 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

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.

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).

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

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
• Date of birth
• Gender
• Relationship with Imperial College
• Next of kin and emergency contact information
• Recruitment information (including copies of references and other information included in a CV or cover letter or as part of the application process)
• CCTV footage and other information obtained through electronic means such as swipe card records
• Photographs
• Clothes size

**How is your personal information collected?**

We collect personal information about you either:

- Via an online volunteer or other people management system – currently this is provided by Better Impact, but may change
- Via email, either in response to marketing communications, or email interactions directly with College staff
- In person, by College staff at recruitment or other events and meetings
- We may sometimes collect additional information from third parties if appropriate, including details of previous employment/volunteer roles or references from former employers or volunteer managers

**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 agreement we have entered into with you or in order to take steps at your request prior to the entry into an agreement.
2. Where we need to comply with a legal obligation.
3. 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**

We need all the categories of information in the list above (see The kind of information we hold about you) primarily to:

- To provide you with the information about the volunteering opportunities that you have committed to, or expressed an interest in
- To contact you in relation to your application or registration to volunteer at the specified
events or programmes

- To make a decision about your recruitment or suitability for the specified volunteering
role

- To contact you regarding your roles, responsibilities and logistical information relevant to
your volunteering opportunity

- To contact you for the purposes of providing feedback on your experience or the event or
programme as a whole

- To notify you about changes to our volunteering programme which may affect your
participation in the programme or training

- To review your volunteering history (for example frequency of commitment, length of
service or other such factors) in order to recognise/reward your commitment either at a
departmental, or College level or to offer specific opportunities which may be appropriate
to your skills

- To notify you of any changes to your volunteering opportunity and/or its administration

- To make decisions about your continued engagement with our volunteer programmes in
accordance with the volunteer policy

- To deal with any disputes involving you, including accidents during events

- To comply with health and safety obligations

- To conduct evaluation work to better understand your volunteering experience and the
effectiveness of the volunteering programme more broadly

- To ensure the information we hold about you is up to date and accurate

- To provide you with relevant news and opportunities by email, phone or post where you
have consented to receive this information

- For equal opportunities monitoring

Some of the above grounds 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 further your
participation in the volunteer programme.

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.

**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 do not expect to have to collect, store and use any “special categories” of more sensitive personal information but if we do have to process any such information, we will let you know and we may approach you for your written consent if required. 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. We will also ask for your consent before we submit your details to the Disclosure and Barring Service if we require evidence of whether you have any criminal convictions (see the section on **Criminal convictions** below).

**Criminal convictions**

You may be asked to provide the College with details of criminal convictions where an opportunity you volunteer for (for example, with the Student Recruitment and Outreach programme) requires a DBS check. A DBS check will only be conducted under the lawful process provided for by law. We will only use the criminal convictions data for the purpose it was collected and it will only be retained for a limited period (see the section on **How long is my personal information retained for?** below).

**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 College 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 we do, 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 the relationship with you or where we have another legitimate interest in doing so.

**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.
We use Better Impact, an online volunteering platform which processes personal data about you, for the following purposes:

- To provide you with a platform to apply to volunteer, select your volunteer shifts and submit personal data necessary for College staff to allocate shifts, roles and equipment or clothing
- To provide College staff with a method by which to contact all volunteers participating in a specific event, or all volunteers registered with Better Impact regarding further opportunities to volunteer

All data held by Better Impact will be kept in accordance with their terms.

Other similar third-party service providers may be used from time to time.

**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.

**Transferring information outside of the EU**

We will occasionally transfer the personal information we collect about you outside the European Economic Area. In these circumstances, your personal data will only be transferred on one of the following bases:

- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. an approved certification mechanism such as Privacy Shield); or
- there exists another situation where the transfer is permitted under applicable law (for example, where we have your explicit consent).

For example, the company Better Impact referred to above will store your personal information in Canada. The European Commission has decided that Canada ensures an adequate level of protection for GDPR purposes and that no additional safeguards need to be put into place where personal data is processed in Canada.

**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 you 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. 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.

In this case we expect to retain your personal data for 6 years from collection.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

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

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.