

## PRIVACY NOTICE FOR RESEARCH PARTNERS, CO-APPLICANTS AND COLLABORATORS

### About this document

This privacy notice (**Notice**) explains how Imperial College London (the **College, we, our, us**) collects, uses and shares (or "processes") personal data of research collaborators and prospective research collaborators (i.e. persons who will be part of research activities and their personal data is required to form part of a funding application and throughout the research itself) (**you, your**), and your rights in relation to the personal data we hold.

This Notice applies alongside any other information the College may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Notice also applies in addition to the College's other relevant policies, including:

- the College's [Data Protection Policy](#);
- the College's [Information Security Policy](#); and

### Data Controller and Data Protection Officer details

For the purposes of any applicable data protection laws in England and Wales, including the EU General Data Protection Regulation 2016/679 (**GDPR**), the College is the data controller of your personal data. The College has appointed a Data Protection Officer, who can be contacted via email at [dpo@imperial.ac.uk](mailto:dpo@imperial.ac.uk), via telephone on 020 7594 3502 and via post at Imperial College London, Data Protection Officer, Faculty Building Level 4, London SW7 2AZ.

### How we collect your information

We may collect your personal data in a number of ways, for example (for the avoidance of doubt, this is not an exhaustive list):

- from the information you provide us as part of the College's research funding application
- information pertained during the course of the research applications and subsequent research activities where funding is approved

### The types of information we collect

We may collect the following types of personal data about you:

- contact and communications information, including:
  - your contact details (including email address(es), telephone numbers and postal address(es));
  - records of communications and interactions we have had with you;
- biographical, educational and social information, including:
  - your name, title, gender, nationality and date of birth;
  - your image and likeness, including as captured in photographs taken for work purposes;
- work related information, including:

- your CV and current contractual agreements relating to salary
- communications sent or received via the College's communication systems;
- any other information relevant to your collaboration with College or provision of services as part of the College's proposed research activities.

**The basis for processing your personal data, how that data is used and whom it is shared with**

**(ii) Legitimate Interests**

We 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 College in a professional, sustainable manner, in accordance with all relevant legal and regulatory requirements. In this respect, we use your personal data for the following:

- to enable relevant authorities to monitor the College's performance and to intervene or assist with incidents as appropriate;
- to carry out or cooperate with any College or external complaints, disciplinary or investigatory process;
- for the purposes of management planning and forecasting, research and statistical analysis and benchmarking;
- promoting the College and its goods, services, events and resources, unless it is appropriate to gain your specific consent;

**Legal Obligations and the College's public task**

As a provider of higher education, the College is in certain respects a public authority. Your personal data will also be processed by the College for compliance with the College's legal obligations or as part of its public interest task. For example:

- As part of the design and implementation of research activities including application for funding, subsequent research activities if funding is approved and following completion the storage/retention of research data
- for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

**Sharing your information with others**

For the purposes referred to in this privacy notice and relying on the basis for processing as set out above, we will share your personal data with certain third parties including:

- research partner, collaborators or co-applicants and the funding provider involved with the funding application
- other individuals similarly engaged in research activities within the College, College employees, agents, contractors and service providers (e.g. third parties processing data on our behalf);
- our advisers where it is necessary for us to obtain their advice or assistance;
- law enforcement agencies; local authorities; HMRC; the Home Office, British overseas consulates; other international and national governmental and regulatory bodies;

As well as the organisations mentioned above, we may in specific circumstances need to share your personal data with third parties who have made legitimate requests under data protection or freedom of information law. We may also share data when the College is legally required to do so (by a court, government body, law enforcement agency or other authority of competent jurisdiction).

### **International transfers of data**

The College will, in limited circumstances, disclose personal data to third parties, or allow personal data to be stored or handled, in countries outside the European Economic Area (EEA). For example, we may transfer data to IT or other service providers based overseas or to funders when they are based outside the EEA.

In these circumstances, your personal data will only be transferred on the basis of one of the following:

- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission);
- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- there exists another situation where the transfer is permitted under applicable law (for example, where we have your explicit consent).

### **How long your information is kept**

Personal data is stored in accordance with the College's retention policy regarding research which is available at <http://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/records-and-archives/public/RetentionSchedule.pdf>.

### **Your rights**

Under the GDPR, you have the following rights:

- to obtain access to, and copies of, the personal data we hold about you. Further information of how to make such an application can be found at <http://www.imperial.ac.uk/admin-services/legal-services-office/data-protection/subject-access-requests/>;
- to require that we cease processing your personal data if the processing is causing you damage or distress;
- to require us not to send you marketing communications;
- to request that we erase your personal data;
- to request that we restrict our data processing activities in relation to your personal data;
- to receive from us the personal data we hold about you, which you have provided to us, in a reasonable format specified by you, including for the purpose of transmitting that personal data to another data controller; and
- to require us to correct the personal data we hold about you if it is incorrect.

**Please note** that the above rights are not absolute, and requests may be refused where exceptions apply. You can find out more about your rights at [www.ico.org.uk](http://www.ico.org.uk).

If you have any questions about these rights or how your personal data is used by us, you should contact the Data Protection Officer whose details are set out in the section *Data controller and Data Protection Officer details* above.

### **Contact and complaints**

The ICO does recommend you seek to resolve any issues with the data controller initially prior to any referral to it. If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact the Data Protection Officer whose details are set out in the section *Data controller and Data Protection Officer details* above.

If following such referral you are still not satisfied with how your personal data is used by the College you can make a complaint to the Information Commissioner ([www.ico.org.uk](http://www.ico.org.uk)).

#### **This notice**

The College will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

***Document last updated on July 3<sup>rd</sup> 2018***