

The Graduate School – PRIVACY NOTICE FOR STUDENTS

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 personal data processed by the Graduate School which relates to Graduate School workshops, webinars, online courses, coaching, events, placements and residential programmes only. If you agree to participate in a research project then you will be provided with a separate information sheet setting out further details of how we will use the data. 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.
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 for a workshop, webinar, online course or residential programme or want to take part in our coaching programme, we may collect, store, use and transfer the following information:

Online courses, webinars and workshops:

- Name, contact details, information relating to your academic study and programme
- Your image, audio and likeness (as captured in photographs or on recordings we make)
- Biographies

Residential programmes:

- Name, contact details, information relating to your academic study and programme, next of kin / emergency contact information
- Any special requirements that you declare which are necessary considerations for a residential course
- Your image, audio and likeness (as captured in photographs or on recordings we make)
- Biographies
- Bank account details for claiming travel expenses

Coaching:

- Name, contact details and other personal information you wish to provide as part of the coaching programme

Placements:

- Name, contact details, information relating to your academic study and programme, next of kin / emergency contact information
- Recruitment information (including right to work documentation, bank account details, payroll details)
- Location of placement, contact details of placement provider
- Your image, audio and likeness (as captured in photographs or on recordings we make)
- Biographies

Membership, Accreditation and Recognition Scheme (MARS)

- Name, contact details, information relating to your academic study and programme, building, research group contact, first and second higher qualification,
- Professional body membership level and number
- Mentor name, contact details, mentor's membership level and number

Graduate Teaching Assistants (GTAs):

- Recruitment information (including right to work documentation, bank account details, payroll details) for GTAs who are engaged in employment with the Graduate School
- A list of trained GTAs including name, email address and department
- Applications for Associate Fellowship of the Higher Education Academy
- Peer observations of GTA teaching

For residential courses only, any special requirements that you declare which are necessary considerations for a residential course (dietary requirements, gender, information about your health, including medical conditions, emergency contact and next of kin).

How is your personal information collected?

We collect the personal information about you through online workshop booking forms, email and hard copy forms / documents.

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 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 vested 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

Situations in which we will use your personal information

We need all the categories of information in the list above (see **Error! Reference source not found.**) so that we can administer the training and support services we have agreed to provide to you. This processing is necessary to fulfil that contract to which you are a party.

We may also need to process the sensitive data you provide to us to ensure your safety and wellbeing. This type of processing is necessary to protect the vital interests of the data subject or others. In addition to this, we also need to process some of the data you provide to us to help us comply with legal obligations which include ensuring that we are providing the right support to you in line with any different needs that you have highlighted.

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 contact you in relation to your application for Associate Fellowship of the Higher Education Academy, including for the purposes of feedback.
- To contact you in relation to your application to the MARS scheme for membership of a professional body (e.g. Royal Society of Chemistry), including for the purposes of feedback.
- Making a decision about your recruitment as a GTA or checking you are legally entitled to work in the UK for the purposes of placement provision
- Determining the terms on which you work for us as a GTA
- Paying you for your work as a GTA
- Determining future participation on our programmes as an external contact
- To ensure we meet any and all legal obligations with regards to the placement we provide to you.
- Complying with health and safety obligations.
- Administering the contract we have entered into with you.
- Education, training and development requirements.
- To conduct data analytics studies to review and better understand student feedback on our provision
- To ensure the information we hold about you is up to date and accurate.

- To provide you with relevant news and information pertinent to your experience at Imperial College London
- Creating biographies of attendees or a delegate or speaker list and distributing the biography/list to speakers and attendees (except in circumstances where it is appropriate to gain your consent)
- Filming, photographing or otherwise recording activities and/or events and publishing such content on our website, social media accounts and other formats where it would not be necessary, appropriate or practicable to obtain your specific consent (for example, we may seek specific consent for prominent or impactful uses).

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, for example, as part of a placement or residential programme you are attending, we may not be able to meet your specific requirements and we may be prevented from complying with our legal obligations relating to placement health and safety.

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.

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

- We will use information about your physical or mental health, or disability status, to ensure your health and safety during placement provision
- To try and meet your specific requests during residential programmes

Do we need your consent?

We do not need your consent to process sensitive personal information you have declared to us for the purpose of residential programmes and placement provision. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. 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 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. The following activities are carried out by third-party service providers: residential workshop venues (Global Retreats) and Global Fellows Programmes (residential courses held in the UK and abroad at a partner university or other external venue), a variety of placement providers, and professional bodies whose membership you are applying for through our GTA programme (Advance HE) or the MARS (Royal Society of Chemistry).

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.

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

However, to ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measure/s 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 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 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. Details of retention periods for different records the College holds are available in our retention policy which is available on this website: <http://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/records-and-archives/public/RetentionSchedule.pdf>.

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.

Our current retention policy is to keep the personal information relating to you for 1 year, unless we have a legitimate reason for retaining your information for longer; for example, where you have

requested to receive further information from us and to keep you informed about future events and opportunities. After this time, the information is destroyed securely. Should a health and safety incident matter relating to student discipline occur during one of our programmes then we will keep this data permanently. The exceptions to this are for the:

- GTA programme where you wish to apply for Associate Fellowship of the Higher Education Academy. In this case we will hold your data for 5 years
- MARS where we hold your data for 5 years

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 (dpo@imperial.ac.uk) or Laura Lane (l.lane@imperial.ac.uk) Head of Strategy and Operations, The Graduate School

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.