# Research Data Storage Service PRIVACY NOTICE

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#### 1. Introduction

The staff of the Research Data Storage Service ("we" "us", or "our") respect your privacy and are committed to protecting your personal data.

Please read this Privacy Notice carefully – it describes why and how we collect and use personal data and provides information about your rights. It applies to personal data provided to us, both by individuals themselves or by third parties and supplements the following wider <u>UCL privacy notice(s)</u>:

- <u>General privacy notice</u> when you visit UCL's website
- <u>Student privacy notice</u>
- Staff privacy notice

We keep this Privacy Notice under regular review. It was last updated on 20<sup>th</sup> September 2018.

#### 2. About us

Research Data Services is part of the Research IT Services at University College London (**UCL**).

UCL, a company incorporated by Royal Charter (number RC 000631), is the entity that determines how and why your personal data is processed. This means that UCL is the 'controller' of your personal data for the purposes of data protection law.

#### 3. <u>Personal data that we collect about you</u>

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).

The Research Data Storage Service collects and stores your name and university contact details. From this information we derive departmental affiliations. A log is kept of email correspondence, and an additional log is made of the times you have accessed the service, changes you have requested to projects, and/or commands sent via SSH.

Please be aware that **this notice DOES NOT COVER research data stored in the Research Data Storage Service** by users. It is the responsibility of the Principle Investigator of each project to ensure that unencrypted personal data is not uploaded to the service.

#### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To register you as a service user and to manage our relationship with you
- To help you with any enquiries you might have relating to the service
- To manage access to your stored data
- To email you information about changes to the service, service interruptions or performance issues, or other messages directly relating to your use of the service.
- To identify departmental managers who may be contacted should you cease employment at UCL and where research data may be at risk of becoming 'orphaned' (with no identifiable owner who can advise on the long-term preservation or curation of the data)

We may also use anonymised data, meaning data from which you *cannot* be identified, for the purposes of:

- Service evaluation and capacity management;
- Service reporting and management information;
- Education and research; or
- Fundraising and promotional purposes.

Anonymised data may also be used in published reports or journals and at conferences.

# 5. Lawful basis for processing personal data

Public task. The processing of your personal data may be necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

# 6. Who we share your personal data with

Your personal data will be collected and processed by our staff and UCL (Access to your personal information is limited to staff who have a legitimate need to see it for the purpose of carrying out their job at UCL.). User identifiers and email addresses are visible to our storage hardware monitoring and management providers, ArcaStream.

ArcaStream (ArcaPix) gather, hold and utilise contact information of individuals in relation to the Research Data Storage Service solely for the provision of contracted systems support under ArcaPix Service Level Agreements (SLA).

# 7. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

# 8. Information security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have established procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

# 9. Data retention

We will only retain your personal data 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.

We will keep your personal data according to the <u>Records Retention Schedule</u>.

#### 10. <u>Your rights</u>

Under certain circumstances, you may have the following rights under data protection legislation in relation to your personal data:

- Right to request access to your personal data;
- Right to request correction of your personal data;
- Right to request erasure of your personal data;
- Right to object to processing of your personal data;
- Right to request restriction of the processing your personal data;
- Right to request the transfer of your personal data; and
- Right to withdraw consent.

If you wish to exercise any of these rights, please contact the Data Protection Officer.

#### Contacting us

You can contact UCL by telephoning +44 (0)20 7679 2000 or by writing to: University College London, Gower Street, London WC1E 6BT.

Please note that UCL has appointed a Data Protection Officer. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact our Data Protection Officer using the details set out below:

Data Protection & Freedom of Information Officer data-protection@ucl.ac.uk

# 11. <u>Complaints</u>

If you wish to complain about our use of personal data, please send an email with the details of your complaint to the <u>Data Protection Officer</u> so that we can look into the issue and respond to you.

You also have the right to lodge a complaint with the Information Commissioner's Office (**ICO**) (the UK data protection regulator). For further information on your rights and how to complain to the ICO, please refer to the <u>ICO website</u>.