

Communications at UCL Eastman

Our commitment to the General Data Protection Regulation

Introduction

The General Data Protection Regulation (GDPR), a European privacy law, came into effect on 25 May 2018. This new law replaced a prior European Union privacy directive originally adopted in 1995.

UCL Eastman has welcomed and embraced the GDPR in its attempt to strengthen, harmonise, and modernise EU data protection and enhance your rights and freedoms as an individual. We are fully committed to abiding by the GDPR's regulations regarding the acquisition, use, storage, retention and deletion of your personal details.

In order to use your data for the purposes described below, we need your specific and verifiable consent, given freely and actively¹. That is why we are asking our contacts to re-subscribe to our mailing lists, so we can be absolutely sure that you'd like to hear from us and are happy for us to retain your personal details.

What data do we have?

The Communications Team at UCL Eastman only* collects personal data when people subscribe to one of our mailing lists so that they can receive our online newsletters and updates via email. We have two mailing lists, one for more general newsletters and updates and one for our Alumni.

When you subscribe, you are asked to give us the following information:

- Your email address
- Your first name
- Your surname
- Your occupation
- Your title (e.g. Mr/Mrs/Dr)
- The name of the organisation which you work for
- Your region/country of residence
- The areas of dentistry you are interested in (General list only)
- The area of dentistry or research you engaged in whilst at Eastman (Alumni list only)
- The year you graduated from Eastman (Alumni list only)

¹In other words, we need to tell you exactly what we want your data for, we need to be able to prove you gave us your consent, we need you to give this consent of your own free will and we need you to give it actively – for example, by actively filling in a form or taking an action.

The only two pieces of information which are mandatory – which we require as a minimum – are your first name and your email address. It is up to you whether you supply the other types of data.

*Please note that UCL and UCL Dental Eastman Institute may also have additional information on past and current students and staff which is being kept for legal reasons. This is kept and administrated separately and is not accessible by members of the Communication Team. For more information on what details we may hold about you in this context please contact gdpr@ucl.ac.uk

Why we have your data and what we use it for

We collect the information above in order to email you the latest news about the Institute and UCL, research updates and items promoting our degree programmes and CPD courses. Beyond your name and email address, the additional information you are asked to submit may be used to tailor specific emails which will be sent to you in addition to our regular newsletters.

Some examples:

If you indicate an interest in Periodontics then you may be sent an email when we introduce a new Periodontics CPD short course.

If you are a Dental Hygienist you may be sent extra emails about our Dental Hygiene MSc programme.

If you are an alumnus who studied Orthodontics in the 1980s you might receive an email from us about an upcoming alumni event run by the Orthodontics department.

Where we keep your data and how we keep it safe

Our mailing lists are kept in two places.

1. They are kept online by MailChimp. These copies are only accessible to those who have our MailChimp log-in details including password. These log-in details are kept in an encrypted file on the UCL server and are only accessible by three members of the Communication Team. When a Communication Team member leaves the password is changed.

MailChimp is based in the US which means your data is technically being transferred out of the EU. We believe that MailChimp provides a very high level of protection with regards to the security of your data ² and we have opted out of MailChimp being able to use our subscriber details in their data science projects. Please also see section 3 of MailChimp's own [Privacy Policy](#).

² MailChimp participates in and has certified its compliance to the EU-US Privacy Shield framework, and is committed to treating all personal data received from EU member countries in accordance with the Privacy Shield framework's applicable principles: "MailChimp has self-certified to both the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield regimes, and lawfully transfers EU/EEA personal data to the U.S. pursuant to our Privacy Shield Certification. We also complete a SOC II Type 2 examination on an annual basis for the Trust Principal Criteria of Security, Processing Integrity, Confidentiality, and Availability." Find out more, see Section 16 of MailChimp's Privacy Policy: https://mailchimp.com/legal/privacy/?_ga=2.261978701.1334882610.1525942824-1275923737.1510828079

2. One copy of each of our mailing lists is kept on a secure UCL server. The folder in which they are stored has restricted access – only members of the Communications Team and UCL IT personnel can access it. The files are also encrypted.

These copies are updated every six months. Individuals who unsubscribe or request to be removed between these updates are removed immediately.

We will never keep your data in other locations or send it via email. We will never give your data to a third party including other divisions or central administrators at UCL – unless compelled to do so by a legal body.

Your rights

The GDPR outlines your enhanced rights including:

- Your right to be forgotten: You may request that an organisation delete all data it holds on you without undue delay.
- Your right to object: You may prohibit certain data uses.
- Your right to rectification: You may request that incomplete data be completed or that incorrect data be corrected.
- Your right of access: You have the right to know what data about you is being processed and how.
- Your right of portability: You may request that personal data held by one organisation be transported to another

What should you do if you want to invoke your rights?

You may request to access, correct, amend or delete information we hold about you (described above) at any time. Please email communications-eastman@ucl.ac.uk or submit a request via our contact form on our website: <http://www.ucl.ac.uk/eastman/about/contact>

In addition, every newsletter and email sent via MailChimp has:

An unsubscribe link – Follow this to link if you do not want to receive any more newsletters. Please note that MailChimp will retain a record of you and your previous activity such as opening emails, clicking on links etc. You must contact us or MailChimp if you'd like all of your data to be permanently deleted.

A privacy settings link – Follow this link to update the details we hold about you.

You can also contact MailChimp directly to ask them to remove your data from our lists: <https://mailchimp.com/contact/?department=legal>