



UCL INDIA SUMMER SCHOOL **PRIVACY NOTICE**

1. Introduction

UCL (“we” “us”, or “our”) respects your privacy and is 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 [UCL privacy notice](#)(s):

- [General privacy notice](#) when you visit UCL’s website
- [Student privacy notice](#)
- [Staff privacy notice](#)

This Privacy Notice describes how we collect, use, store, retain, disclose or otherwise process your personal data during and after your relationship with us, in accordance with the applicable data protection laws such as the Information Technology (Reasonable security practices and procedures and sensitive personal data or information) Rules, 2011 (“SPDI Rules”) read with the Information Technology Act, 2000 (“IT Act”), the Digital Personal Data Protection Act, 2023 (“DPDPA”), the Data Protection Act 2018 and the UK General Data Protection Regulation (“UK GDPR”) (“Data Protection Laws”). Further, in the event of any discrepancy between the information in the links provided herein and this Privacy Notice, the terms of this Privacy Notice will prevail.

Your personal data may be processed in the UK and/or India, and in such an event the applicable Data Protection Laws may apply to such processing of your personal data.

We keep this Privacy Notice under regular review. It was last updated on 1st March 2024.

2. About us

The UCL India Summer School is part of the External Engagement 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/fiduciary’ of your personal data for the purposes of the applicable Data Protection Laws.

3. Consent

Please provide your personal data to us by clicking on the “Submit” button on the application form for the UCL India Summer School only if you agree to the terms of this Privacy Notice. If an offer to take part on the UCL India Summer School is made to you, then please only sign the acceptance form if you agree to the terms of this Privacy Notice. We will consider that your consent is free, specific, informed, unconditional and unambiguous. This Privacy Notice is in English language, if you require us to share it in any local language, you may write to us at data-protection@ucl.ac.uk.

Your clicking on the “Submit” button on the application form, and your signature of the acceptance form where an offer of a place on the UCL India Summer School is made, will also result in a confirmation to us that you have read this Privacy Notice, and agree with the same. It will also amount to a confirmation that you are the parent or lawful guardian of the child (who is aged below 18 years) on whose behalf you are enquiring or applying for admission, and that you are over 18 years of age and are able to form a lawful contract with us.

If you have any questions in relation to the processing of your personal data, you may write to us at data-protection@ucl.ac.uk.

If you do not consent to this Privacy Notice, we request you to not share your personal data with us. If you wish to withdraw your consent, you can refer to the steps mentioned in this Privacy Notice and write to us at data-protection@ucl.ac.uk.

4. Personal data that we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. The applicable Data Protection Laws do not include data:

- where the identity has been removed (anonymous data);
- that is freely available in the public domain if such data is being made available by the data principal to whom such data relates, or by any other person who is under an obligation under law to make such data publicly available; and
- that is processed by an individual for any personal or domestic purpose.

We may collect, use, store and transfer different kinds of personal data about you. This may include:

- Your name, date of birth and contact details (which shall include for example email, postal address).
- The names and other details about third parties who are involved in the issues we are helping you with (for example, the name of the school, the name of a principal school counsellor; parent / legal guardian details including phone and email address).
- In addition to the above, we will also require the following: a 200 -word letter of support from a teacher at your current school, which should include the name of your teacher, the teacher’s official designation at the school and the teacher’s email address. Please

ensure that the letter of support includes express consent from the teacher to share the letter with us. As part of your submission, you will be required to provide a transcript of your exam results from your Standard 10 (or equivalent) and a personal statement. The contents of that statement will also be stored with your application.

5. How we process your personal data

For the purpose of this Privacy Notice, “processing” of your personal data means a wholly or partly automated operation or set of operations performed on digital personal data, and includes operations such as collection, recording, organisation, structuring, storage, adaptation, retrieval, use, alignment or combination, indexing, sharing, disclosure by transmission, dissemination or otherwise making available, restriction, erasure or destruction.

We will only process your personal data when the Data Protection Laws allow us to, and under lawful consent. Most commonly, we will use your personal data in relation to your admission to our UCL India Summer School programme(s), and if you are made an offer to take part on the UCL India Summer School programme which you accept, delivery of the programme to you, which includes the following circumstances:

- **To assess and process your application for the UCL India Summer School and to manage our relationship with you and those supporting your application (which is likely to include your parent / legal guardian / school teacher).**
- **To help you with your enquiry.**
- **If you take part in the UCL India Summer School programme, delivering the programme in India.**
- **We may send marketing and other non-transactional information such as newsletters, SMS and notifications, relating to the UCL India Summer School or our other programmes which may be relevant for your academic journey (subject to compliance with applicable Data Protection Laws).**

We may, however, process your personal data without your consent for the limited purposes of complying with our obligations under law, or where the law permits processing of personal data without prior consents.

Where the processing is based on your consent, you have the right to withdraw your consent at any time by contacting us using the details set out below. Please note that this will not affect the lawfulness of processing based on consent before its withdrawal.

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

- Service evaluation;

- Education and research; or
- Fundraising and promotional purposes.

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

6. Who we share your personal data with

Your personal data will be collected and processed only by 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 or its partners in relation to your application.

We may have to share your personal data with the parties set out in the link below for the purposes outlined in section 5, or for legal or regulatory purposes:

<https://www.ucl.ac.uk/legal-services/privacy/general-privacy-notice>

We will also share your personal data in accordance with section 8 below.

We require all third parties to respect the security of your personal data and to treat it in accordance with the applicable Data Protection Laws.

7. Lawful basis for processing

The Data Protection Laws require that we meet certain conditions before we are allowed to use your personal data in the manner described in this notice, including having a "lawful basis" for the processing. As per the applicable Data Protection Laws, the basis for processing will be as follows:

- Consent. You have given us your free, specific, informed, unconditional and unambiguous consent for processing your/your child's personal data.
- Contract. The processing is necessary for the performance of a contract with you or a government authority or in order to take steps prior to entering into a contract with you.
- 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.
- Legitimate interests (applies under the UK GDPR only). The processing of your personal data may be necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or by fundamental rights and freedoms which require protection of personal data.
- Legitimate uses (applies under the DPDPA only). The processing of your personal data without consent is allowed under the applicable Data Protection Laws for the following legitimate use situations:
 - Enforcing any legal right or claim;

- Processing by any court or tribunal or any other body in India which is entrusted by law with the performance of any judicial or quasi-judicial or regulatory or supervisory function, where such processing is necessary for the performance of such function;
- Processing in the interest of prevention, detection, investigation or prosecution of any offence or contravention of any law for the time being in force in India;
- Fulfilling any obligation under any law for the time being in force in India to disclose any information to the state or any of its instrumentalities;
- Compliance with any judgment or decree or order issued under any law for the time being in force in India, or any judgment or order relating to claims of a contractual or civil nature under any law for the time being in force outside India;
- Responding to a medical emergency involving a threat to your life or immediate threat to your health or any other individual;
- Taking measures to provide medical treatment or health services to any individual during an epidemic, outbreak of disease, or any other threat to public health; or
- Taking measures to ensure safety of, or provide assistance or services to, any individual during any disaster, or any breakdown of public order.

8. International transfers

We will only transfer your personal data to The British School Society (operating as The British School New Delhi) in India on whose campus the UCL India Summer School will take place, in accordance with the applicable Data Protection Laws to verify your identity and offer of a place at the Indian Summer School. Any personal data collected directly by The British School Society will be processed for their own purposes and UCL will not be responsible for you sharing this personal data with them.

9. Information security

We have put in place appropriate security measures and safeguards to prevent your personal data from unauthorized access, use, modification, accidental acquisition, loss of access, sharing, destruction or disclosure. 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.

10. 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. Unless retention is necessary for compliance with the applicable Data Protection Laws, we shall: (i) erase the personal data upon the earlier of your withdrawal of consent or as soon as it is reasonable to assume that the specified purpose for which

personal data was collected is no longer being served; and (ii) cause the data processors to erase any personal data that was made available to them for processing.

We will keep your personal data according to the [Records Retention Schedule](#).

11. Your rights

Under certain circumstances, you may have the following rights under the Data Protection Laws in relation to your personal data:

- Right to request access to your personal data;
- Right to request correction, completion and updating 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 on the processing of your personal data;
- Right to request the transfer of your personal data;
- Right to withdraw consent;
- Right of grievance redressal;
- Right to nominate.

If you wish to exercise any of these rights, please contact the [Data Protection Officer](#).

12. 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

13. Complaints

If you wish to complain about our use of your personal data, please send an email with the details of your complaint to the [Data Protection Officer](#)/other applicable regulator.

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

14. **Grievance redressal**

In compliance with the applicable Data Protection Laws, we have designated UCL's Data Protection Officer (currently Alexandra Potts) as our grievance officer to address any discrepancies or grievances you may have in relation to processing of your personal data.

On receipt of any grievance, the grievance officer shall redress the grievances expeditiously, but within 1 (one) month, and shall ensure that proper steps, safeguards and suitable action, if warranted, is taken to redress the grievance.

You may reach the Grievance Officer by sending an email at data-protection@ucl.ac.uk

15. **Changes to the terms**

We may update the Privacy Notice from time to time. The updated Privacy Notice will always be available on our website. We will notify you of any updates to the Privacy Notice that might materially affect the processing of your personal data.