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# **General Privacy Notice for Third Parties, Information Rights Requesters, Contractors, Suppliers and Users of our Website**

## **Introduction**

This privacy notice is designed to help you understand how we use and protect the information obtained from any individual who:

- contacts UCL by any means
- provides services to UCL
- visits or and uses UCL's website, e.g. [www.ucl.ac.uk](http://www.ucl.ac.uk) and its subdomains (the "website")
- requests information under the information compliance legislation, e.g. data protection or freedom of information
- provides UCL with unsolicited personal information.

It applies to personal data provided to us, both by individuals themselves or by third parties and supplements any other UCL privacy notices which may apply, for example the student privacy notice if you apply for a programme of study here.

This is a General Privacy Notice, and may be superseded by a 'Local Privacy Notice' depending on what basis you are contacting UCL and whether you are completing additional web forms, payments or applications.

## **About us**

UCL (the "University", "us" or "we"), a company incorporated by Royal Charter (number RC 000631), is the entity that determines how and why your personal data is processed. In accordance with data protection legislation, we are a Controller and this means that we are legally responsible for the personal data we collect and hold about you.

One of our responsibilities is to tell you about the different ways in which we use your personal data – what information we collect (and our legal basis for doing so), why we collect it, where we collect it from and whether (and with whom) we will share it. We also need to tell you about your rights in relation to the information. This statement provides further details about all of these issues.

## **What information you provide to us**

Personal data, or personal information, means any information about an individual from which that person can be identified. In order to communicate with you, to provide you with services or information, we may collect, use, store and transfer different kinds of personal data about you. Depending on your relationship with us, this may include:

- Personal details (such as your name, contact details and email address) that you provide by contacting us, requesting information or submitting your information via the website.
- Personal details (such as names, titles and business contact information including addresses, telephone numbers and email addresses) for the employees and representatives of our suppliers and partners
- Your responses to surveys which we ask you to complete for research purposes.
- Any other information you post, email or otherwise send to us.
- How you use the website and where available, your IP address, operating system and browser type.

In some cases you may choose to provide unsolicited personal information (information we have not asked for) to us such as a CV, or medical records you wish to discuss with a member of staff. Where this is the case, this personal data will be handled with the same care as any other personal data we process and in accordance with data protection legislation as laid out in this notice.

We will also collect personal information about website usage through cookies in accordance with our Cookies Policy.

Where we need to collect personal data by law and you fail to provide that data when requested we may not be able to provide the services/support you require (for example, complying with a freedom of information request). In this case, we will notify you if this is the case at the time.

### **How we will use the information**

We will only use your personal data when the law allows us to do so.

Most commonly, we will use your personal data for the following purposes:

- to help you with your enquiry or request (performance of a contract, public task, lawful interest)
- to manage the relationship with our suppliers and partners (performance of a contract, legitimate interests (necessary to ensure our suppliers and partners carry out their tasks appropriately))
- to comply with a legal or regulatory obligation (lawful interest)
- to enable us to provide you with a product, facility or service we offer (performance of a contract)
- to process feedback and improve our services (legitimate interests (to develop and improve our services))
- to manage and improve the web system and troubleshoot problems (legitimate interests (to protect and improve the running of UCL, our IT services and network security))
- where personal information is collected on UCL's website, for instance through a web form or an online payment system, users will be informed as to what

information is being captured, why and who (if anyone) it will be shared with, via a Local Privacy Notice (performance of a contract).

The University also uses Google Analytics, a web analytics service provided by Google, Inc. ("Google") to understand how visitors engage with our website and so we can improve it. You can view [Google's Privacy Policy](#) and find out how you can opt out of [Google Analytics](#) via your browser.

### **Using your information in accordance with data protection laws**

Data protection legislation requires that we meet certain conditions before we are allowed to use your data in the manner described in this notice, including having a "legal basis" for the processing. These bases are explained below.

**Consent:** You have given us your consent for processing your personal data.

**Performance of contract:** The processing of your personal data may be necessary in relation to the contract we have entered into with you or an organisation you represent, to provide UCL's services to you, or because you have asked for something to be done so you can enter into such contract.

**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:** 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. It may be necessary for our legitimate interests to collect your personal data to enable us to manage certain operations of the University effectively.

**Lawful interests:** processing is necessary for compliance with a legal obligation to which the controller is subject.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### **Principles**

We will handle your personal data in accordance with the principles set out below:

<b>Principle</b>	<b>Personal Data shall be:</b>
Lawfulness, fairness and transparency	be processed lawfully, fairly and in a transparent manner in relation to the data subject.

<b>Principle</b>	<b>Personal Data shall be:</b>
Purpose limitation	collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
Data minimisation	adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
Accuracy	accurate and, where necessary, kept up to date.
Storage limitation	kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
Integrity and confidentiality	processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
Accountability	be able to demonstrate compliance with the above principles.

### **Change of purpose**

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Sharing your personal information**

We may have to share your personal data with the parties set out below for the purposes outlined above:

- If you decide to make on-line payments to UCL, some information will be disclosed to UCL's service provider for validation purposes
- External third party service providers: there may be times when external organisations use your personal information as part of providing a service to us or as part of checking the quality of our service, such as our auditors;
- Law enforcement or other government and regulatory agencies: we may be required by law to disclose certain information to the police or another relevant authority in circumstances e.g. where we think you or someone else is at serious risk of harm.

We may also receive requests from third parties with authority to obtain disclosure of personal data. We will only fulfil such requests where we are permitted to do so in accordance with applicable law or regulation.

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

## **International transfers**

We may use third party providers to deliver our services, such as externally hosted software or cloud providers, and those providers may involve transfers of personal data outside of the UK. Whenever we do this, to ensure that your personal data is treated by those third parties securely and in a way that is consistent with UK data protection law, we require such third parties to agree to put in place safeguards. This may include specific contracts approved for use in the UK which give personal data the same protection it has in the UK or other equivalent measures as required.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## **How we will protect information about you**

We do our utmost to protect your privacy. Data protection legislation obliges us to follow security procedures regarding the storage and disclosure of personal information in order to avoid unauthorised loss or access. As such we have implemented industry-standard security systems and procedures to protect information from unauthorised disclosure, misuse or destruction. 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.

## **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, and in accordance with [UCL Records Retention Schedule](#).

## **Your rights**

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

**Right 1:** A right to access personal data held by us about you (commonly known as a "data subject access request").

**Right 2:** A right to require us to rectify any inaccurate personal data held by us about you, though we may need to verify the accuracy of the new data you provide to us.

**Right 3:** A right to require us to erase personal data held by us about you where there is no good reason for us continuing to process it. This right will only apply where, for example, we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below). Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request

**Right 4:** A right to restrict our processing of personal data held by us about you. This right will only apply where, for example, you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but we require the data for the purposes of dealing with legal claims or due to having overriding legitimate grounds to use it.

**Right 5:** A right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format. You also have the right to require us to transfer this personal data to another organisation.

**Right 6:** A right to object to our processing of personal data held by us about you 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 as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Right 7:** A right to withdraw your consent, where we are relying on it to use your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

**Right 8:** A right to ask us not to use information about you in a way that allows computers to make decisions about you and ask us to stop.

If you wish to exercise any of these rights, please contact the Data Protection Officer using [data-protection@ucl.ac.uk](mailto:data-protection@ucl.ac.uk) or +44 (0)20 3108 8726.

You have the right to lodge a formal complaint with the UK Information Commissioner's Office. Full details may be accessed on the [complaints section](#) of the ICO's website. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Other websites and the scope of this privacy notice**

The UCL website contains links to and from the websites of third parties. This privacy notice applies to the UCL website only so if you follow a link to other websites please note that these websites will have their own privacy policies and that we do not accept responsibility or liability for these policies. Please check these policies before you submit any personal data to these third party websites.

Separate privacy notices are used whenever we collect personal information from you. The general privacy notices for staff, students and applicants can be found on the [UCL Legal Services website](#).

### **Changes to our privacy notice**

Our Privacy Notice may be updated from time to time. Any updates will appear on this webpage. This notice was last updated in November 2021.

### **How to contact us**

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

If you have any questions about our privacy notice please contact the Data Protection Officer on [data-protection@ucl.ac.uk](mailto:data-protection@ucl.ac.uk) University College London, Legal Services, 6th Floor, Bidborough House, London, WC1H 9BF.