

UCL GDPR ONLINE TRAINING v1.1

1. Introduction

University College London (“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 in respect of UCL’s GDPR online training 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\(s\)](#):

- [Student privacy notice](#)
- [Staff privacy notice](#)

We keep this Privacy Notice under regular review. It was last updated on 04th September 2018.

2. About us

The UCL GDPR Preparedness Programme is a programme which was established in January 2018 to meet the challenge of compliance posed by the new General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

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. Personal data that we collect about you

As part of the completion of the online training, we will gather the following data:

Your UCL UserID which will link to details held in your HR record including:

Name
Surname
Grade
Department/Faculty/School

Date of first login

Date of completion

Score of the assessment

We will not collect any Special Categories Data or Criminal records data.

4. Legal basis for processing

Our legal basis for processing your personal data in this context is:

Article 6(1)(c) - 'Legal Obligation' - i.e. compliance with a legal obligation, as UCL is obliged by data protection law to put in place appropriate technical and organisational measures - such as staff training - to ensure that processing is carried out in accordance with the legislation.

5. How we use your personal data

The completion results as well as the score of your assessment will form part of your HR/Student record at UCL.

6. Who we share your personal data with

Your personal data will be collected and processed primarily by UCL staff members and our consultants who work on the UCL GDPR Preparedness Programme. Access to your personal information is limited to individuals who have a legitimate need to see it for the purpose of carrying out their job at UCL. We may have to share your personal data with the parties set out below for the purposes outlined in section 4:

Marshalls ACM – The service provider of the training module – [Privacy Policy](#)

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.

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 [Records Retention Schedule](#).

10. Your rights

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. Complaints

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