

## Version control

Version number	Author	Purpose /change	Date
1.0	Thibault Williams – GDPR Programme Manager	First final approval by GDPR PM and DPO.	16 November 2019
1.1	Thibault Williams - GDPR Programme Manager	Second final approval by GDPR PM and DPO	19 November 2019
1.2	Alexandra Potts – DPO	Revision to take account of amendments to law	12 November 2021

## Table of contents

<b><u>Introduction</u></b> .....	1
<b><u>About us</u></b> .....	1
<b><u>What information you provide to us</u></b> .....	1
<b><u>How we will use the information</u></b> .....	1
<b><u>Using your information in accordance with data protection laws</u></b> .....	2
<b><u>Principles</u></b> .....	2
<b><u>Sharing your personal information</u></b> .....	3
<b><u>How we will protect information about you</u></b> .....	3
<b><u>Data retention</u></b> .....	4
<b><u>Your rights</u></b> .....	4
<b><u>Changes to our privacy notice</u></b> .....	5
<b><u>How to contact us</u></b> .....	5

# **General Privacy Notice for visitors to UCL**

## **Introduction**

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

- Registers with UCL to gain a visitor status and associated UCL credentials to access UCL systems and services.

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

This is a General Privacy Notice, and may be superseded by a 'Local Privacy Notice' depending on what basis you are contacting UCL and whether you are completing additional web forms, payments or applications.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

## **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;
- to manage the relationship with our suppliers and partners;
- to comply with a legal or regulatory obligation;

- to enable us to provide you with a product, facility or service we offer;
- monitor compliance by you with UCL's policies and legal obligations;
- monitor your use of our networks to protect the security and integrity of UCL's IT network and information and electronic communications systems. Please see [UCL's Policy on Monitoring Computer and Network Use](#) for further guidance on the monitoring that we may carry out.

Identification and security, including information security:

- Where applicable, we will use images of you in order to issue you with a UCL ID card;
- We will also process your personal data to manage our access control systems and for other security purposes, including in relation to information security and our IT systems and also via on-premises CCTV security cameras.

### **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.

**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.

### **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.
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 what 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:

- 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. 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 EU. 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, such as the EU model clauses or equivalent measures.

### **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”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**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. 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.

In certain circumstances, we may need to restrict your rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).

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.

### **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