

# Royal Holloway Applicant Privacy Notice

## Introduction

Royal Holloway and Bedford New College, also known as Royal Holloway, University of London, will act in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 when controlling and processing your personal data.

This notice explains how we collect, use and share your personal data and your rights in relation to the processing of your data.

In this notice:

- **'personal data'** means any data which can identify you directly or indirectly (whether by itself or when combined with other data), regardless of the format or media on which the data are stored. This includes data that can identify you when combined with other data that is held separately (pseudonymous data) but does not include data that has been manipulated so that you can no longer be identified from it (anonymous data).
- **'special category data'** is personal data that needs more protection because it is sensitive. The GDPR defines special category data as personal data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic, biometric, health, sex life and sexual orientation.
- **'processing'** means any activity relating to your personal data including collection, use, alteration, storage, disclosure and destruction.

We keep this notice under regular review. This notice was last updated on 17 Dec 2020.

## Purpose and legal basis for processing

Overall, we will use your personal data in connection with your application to the College as a prospective student. The main purposes for which we process your personal data as an applicant are set out in the table below.

Data protection laws require us to meet certain conditions before we are allowed to use your personal data in the manner described in this notice, including having a "legal basis" for the processing. Where we process special category personal data or criminal convictions data, we are required to establish an additional legal basis for processing that data.

We take our responsibilities under data protection laws extremely seriously, including meeting these conditions. The main legal bases on which your personal data are processed for a particular purpose are also explained in the table below.

Purpose	Legal Basis
<p><b>To process and manage your application</b></p> <p>We will use your personal information to:</p> <ul style="list-style-type: none"> <li>• Give you advice on how to apply to study at the College and communicate with you generally;</li> <li>• Tell you about the opportunities and support that are available to you, such as funding streams, induction and alternative programmes of study;</li> <li>• To provide feedback e.g. if you attend an open day;</li> <li>• Assess your application to study at the College, including your fees status;</li> <li>• Create a student application record;</li> <li>• Form a decision about your application with a view to accepting or rejecting your application;</li> <li>• Assess your eligibility to study on your chosen course;</li> <li>• Communicate with you about your application; and</li> <li>• Administer our appeals and complaints process.</li> <li>• To request optional participation in surveys for audience research purposes.</li> </ul> <p>This will include asking all offer holders to disclose relevant criminal convictions (further information on this topic will be provided at the point when this question is asked).</p> <p>In some cases, the information processed will include special category personal data. For example, we may use disability information to help us make reasonable adjustments to meet your health and welfare requirements during the application process.</p> <p>We will also process criminal convictions data where you will be working with children or vulnerable adults, and/or because of fitness to practise requirements in certain regulated professions. For example, certain courses such as Medicine will require a DBS check to be carried out as part of the assessment of eligibility. You will be notified prior to the processing if this is a requirement for enrolment on the course that you have applied for.</p>	<p><b>For all personal data</b></p> <p><b>Performance of a task in the public interest</b> The College will be processing personal data in its capacity as a public authority in connection with its core purposes of education, research and innovation.</p> <p><b>Performance of contract</b> The processing of your personal data may be necessary in relation to the contract we will enter into with you if you become a student at the College.</p> <p><b>Legitimate interest</b> We will use your personal data to send you information you may be interested on the basis of legitimate interest, including information about your chosen course, event invitations and details on accommodation and scholarships. You can opt out of these communications at any time using the links in our email communications.</p> <p><b>Equality of opportunity or treatment</b> We process special category personal data in order to monitor equality of opportunity/treatment.</p> <p><b>Explicit consent</b> Where we use disability information to help us make reasonable adjustments to meet your health and welfare requirements during the application process, we will rely on your explicit consent.</p> <p><b>For criminal convictions data</b></p> <p><b>Regulatory requirements relating to unlawful acts and dishonesty</b> We may process your criminal convictions data in order to assist a third party to comply with a regulatory requirement that requires the taking of steps to establish whether another person has: (i) committed an unlawful act, or (ii) been involved in dishonesty, malpractice or other seriously improper conduct do so.</p> <p><b>Safeguarding of children and of individuals at risk</b> We may process your criminal convictions data in order to safeguard children or individuals at risk.</p> <p><b>Protecting the public against dishonesty</b></p>

## Purpose

## Legal Basis

We may process your criminal convictions data in order to protect the public against dishonesty, malpractice or other seriously improper conduct; and unfitness or incompetence.

Where we are relying on a legal basis other than those set out above in processing your criminal convictions data, we will inform you of the legal basis before we start processing your criminal convictions data based on that legal ground.

### **Internal and statutory reporting and other legal obligations, including compliance with health and safety law and monitoring equality of opportunity or treatment**

We will use your personal information to:

- Comply with our legal obligations;
- Produce statistics and research for internal and statutory reporting purposes; and
- Monitor our compliance with our responsibilities under equalities legislation.

This may include the processing of special category personal data, e.g. information about disabilities or ethnicity.

### **For all personal data**

#### **Compliance with a legal obligation**

Much of our processing of your personal data in this context will be in order to comply with our legal obligations, e.g. health and safety legislation and UK equal opportunities monitoring.

#### **Performance of a task in the public interest**

The College will be processing personal data in its capacity as a public authority in connection with its core purposes of education, research and innovation.

### **For special category personal data**

#### **Equality of opportunity or treatment**

We process special category personal data in order to monitor equality of opportunity/treatment.

### **Fees and funding**

We will use your personal information to administer the financial aspects of your relationship with us and any funders/sponsors.

We will not generally process special category personal data or criminal convictions data in this context.

#### **Performance of a task in the public interest**

The College will be processing personal data in its capacity as a public authority in connection with its core purposes of education, research and innovation.

#### **Performance of contract**

The processing of your personal data may be necessary in relation to the contract we will enter into with you if you become a student at the College.

### **Marketing/publicity materials**

If you attend an open day or other event at the College, we may take photographs or videos at that event which may include images of you. These images will generally be used for the College's marketing/publicity materials.

#### **Legitimate interests**

When using your personal data for the purpose of marketing or publicity materials, we will generally rely on our legitimate interests in promoting the College,

## Purpose

## Legal Basis

including our courses, our activities and our overall aims and objectives.

### Research

As an established research institution, we may use your personal information for research purposes.

#### Performance of a task in the public interest

The College will be processing personal data in its capacity as a public authority in connection with its core purposes of education or research.

#### For special category personal data and criminal convictions data

##### Research purposes

We may process special category data and criminal convictions data for the purposes of research.

## What personal data will be collected

The data the College collects includes:

- personal contact details including your:
  - full name
  - date of birth
  - email address
  - home/postal address
  - mobile and/or landline phone number
- education and professional details:
  - institutions at which you have previously studied
  - qualifications and results
  - previous employment and reference details
- copies of documents you provide to prove your age and identity
- your nationality and residency status including copies of documents you provide in support of these criteria
- contextual information provided as part of your UCAS application:
  - parent HE attendance
- information to enable us to determine whether you meet our Widening Participation criteria
  - time spent in care
  - disability
  - POLAR scores – to identify residency in a low participation neighbourhood
  - information on your previous school(s) to identify low performing schools based on average performance in GCSE or GCE/equivalent qualifications
  - age to identify mature students

Special category data processed may include:

- age
- sex
- disability
- physical or mental health details
- spent and unspent criminal convictions

## Personal data provided by you about others

You may provide us with personal data about other individuals.

All applicants are required to include a reference to support their application, from which we will collect the name, job title and contact details of the referee.

If you apply via UCAS you will have the opportunity to supply a nominated person's details with whom we may discuss your application. These details will consist of their name and relationship to you.

You should notify the relevant person that you are providing their contact details to the College and in what capacity.

## How and when do we collect your personal data?

We receive your personal data when you submit an application to us via UCAS or directly to us via the Royal Holloway Direct Application system.

We may also receive your data via direct telephone, email or web-chat enquiry correspondence with you, or with a nominated contact or agent.

If you attend an online event, we may record sessions or keep a record of conversation for monitoring purposes.

## Personal data from third parties

If you apply via UCAS we will collect and process your data in line with the UCAS privacy policy: <https://www.ucas.com/about-us/policies/privacy-policies-and-declarations/ucas-privacy-policy>

If you apply via an agent associated with our Study Group partnership, we will collect and process your data in line with the Study Group privacy policy: <https://www.studygroup.com/privacy-policy>. If you are unsure whether this applies to you, please contact your agent.

## How long the College will retain your personal data

The College must only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Specified retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, the College has taken into account:

- the nature, sensitivity and volume of the personal data
- the potential risk of harm to you arising from the College's continued retention of the personal data
- the purposes for which the College may process your personal data
- whether the College is required to retain any personal data by law or in accordance with its legitimate interests

Your data will be kept in accordance with the College's Records Retention Policy and Schedule.

## CCTV and automatic number plate recognition (ANPR)

The College has a comprehensive, image-only CCTV surveillance system across its campus. Cameras located on and within buildings are monitored by Security. On occasions, Security staff will wear Body Worn Cameras in the course of their duties. These cameras record both images and sound, and data captured in this manner is processed in compliance with GDPR.

College uses ANPR (Automatic Number Plate Recognition) camera technology to manage, control and enforce parking on its sites. They are governed under guidelines from the Information Commissioner's Office on the use of CCTV and ANPR Cameras and are operated by College's Security team. In exceptional circumstances this information may be used as evidence in disciplinary cases.

## Sharing your personal data with third parties

Where the College uses third parties to process personal data on its behalf (acting as data processors), a written contract will be put in place to ensure that any personal data shared will be held in accordance with the requirements of data protection law and that such data processors have appropriate security measures in place in relation to your personal data.

This includes the following:

- Platforms used to deliver email and SMS messages
- Mailing houses in order to fulfil direct mail communications
- Agencies used to deliver marketing through social media platforms
- Companies specialising in supporting applications principally through one to one communication. Where necessary and appropriate and with our knowledge and consent, these companies may use an overseas subsidiary or associated company to carry out this processing. If that is the case, where the overseas transfer takes place outside the EEA or where there is no adequacy decision about the standards of data protection regulation in the country in question, we will ensure that appropriate approved standard contract wording is in place.

Parents, family members and guardians are considered to be third parties and your personal data will not be disclosed to such persons unless you have given your consent or the disclosure is otherwise made in accordance with data protection law.

Your personal data may be disclosed to other organisations as required by law, for crime prevention, investigation or detection purposes or in order to protect your vital interests. Disclosures may also be made to sponsors, government agencies and present or potential employers. One such body is the Higher Education Statistics Agency (HESA) and further information about the uses for which HESA processes personal data can be found on the HESA website.

Please note that in certain circumstances we may need to share your personal information with a regulator or to otherwise comply with the law.

## International Data Transfers

Most personal data about you, including your personnel file, will be stored on servers within the UK or elsewhere within the European Economic Area (EEA).

As well as within the UK, the College and its contracted third parties may transfer the personal information we collect about you to the following countries: USA, Singapore and India. This will only take place in circumstances where there are appropriate and adequate safeguards in place which incorporate appropriate assurances to ensure the security of the information and compliance with legislative and regulatory requirements. If you require further information about these protective measures, you can request it from [dataprotection@rhul.ac.uk](mailto:dataprotection@rhul.ac.uk).

## How the College keeps your personal data secure

The College has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way or altered or disclosed. In addition, the College limits access to your personal data to the persons and organisations including those describes above, who have a lawful and/or legitimate need to access it.

The College has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where legally required to do so.

## You and your data

You have a number of rights in relation to the processing of your personal data by the College:

- **Access:** You have the [right to request access](#) to and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data to check that the College is processing it lawfully and fairly.
- **Correction:** You have the [right to request correction](#) of any inaccurate or incomplete personal data held about you.
- **Deletion:** You have the [right to request erasure](#) of any personal data held about you where there is no good reason for the College to continue processing it or where you have exercised your right to object to the processing of your personal data.
- **Restriction:** You have the [right to request restriction](#) of how the College processes your personal data; for example, to confirm its accuracy or the College's reasons for holding it or as an alternative to its erasure.
- **Objection:** You have the [right to object](#) to the College's processing of any personal data which is based on the legitimate interests of the College or those of a third party based on your particular circumstances. You also have the right to object to the College processing your personal data for direct marketing purposes.
- **Portability:** You have the right to receive or [request that the College transfers](#) a copy of your personal data in an electronic format where the basis of the College processing such personal data is your consent or the performance of a contract, and the information is processed by automated means.
- **Complaints:** You have the right to complain to the [Information Commissioner's Office \(ICO\)](#) in relation to how the College processes your personal data. Our registration number with the Information Commissioner's Office is Z7056965.

The College may be entitled to refuse any request in certain circumstances and where this is the case, you will be notified accordingly.

Where the lawful ground relied upon by the College to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason.

However, if you do so, the College may not be able to provide some or all of its services to you or the provision of those services may be affected.

You will not have to pay any fee to exercise any of the above rights, though the College may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, you will be notified accordingly.

To protect the confidentiality of your personal data the College may ask you to verify your identity before fulfilling any request in relation to your personal data.

## Changes to this notice

The College may update this notice at any time and may provide you with further notices on specific occasions where we collect and process personal data about you. You should check this notice regularly to take notice of any changes. Where any change affects your rights and interests, we will make sure we bring this to your attention and clearly explain what this means for you.

## Questions or comments

If you have any questions or comments regarding this notice or you wish to exercise any of your rights you should contact our Data Protection Officer by email at [dataprotection@rhul.ac.uk](mailto:dataprotection@rhul.ac.uk).

You also have the right to complain to the Information Commissioner's Office and you can find more information on their website – [www.ico.org.uk](http://www.ico.org.uk)