

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 General Data Protection Regulation (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).
- **'processing'** means any activity relating to your personal data including collection, use, alteration, storage, disclosure and destruction.

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.

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>

Why do we collect this data, how do we use it and what is our legal basis for doing so?

We collect your data in order to:

- take steps before entering into a contract with you at your request such as:
 - responding to your enquiry regarding studying at Royal Holloway, including providing information about eligibility for programmes and available and content of programmes
 - communicating with you, once you have applied, in order to clarify elements of your application or to request further information from you

- processing your application once you have applied to study at Royal Holloway, to enable us to make a decision on your suitability for your programme(s) of choice and to communicate this to you
- sending you information via email, post and SMS about Applicant Visit Days, information from the department(s) to which you have applied and from non-academic departments including Accommodation and Support Services.
- communicate with you once you hold an offer to study with us to explain the next steps up to the enrolment process when you become a student
- comply with the College's legal obligations, such as
 - immigration legislation
 - to prevent or detect fraudulent applications
 - to provide statutory returns to HESA and to meet other legislative obligations to external bodies
- conduct equal opportunities monitoring including assessing your eligibility for a contextual offer in line with our Widening Participation criteria

In circumstances where you have a genuine choice as to whether we should process your personal data, we will ask you for your **consent**. The method used to obtain your consent will depend on the scope and context of the processing that we propose.

In relation to special categories of personal data and personal data relating to criminal convictions and offences, we may request your explicit consent unless a condition applies which allows us to process such personal data without doing so.

Criminal convictions data – in certain circumstances we will ask you to provide information about unspent criminal convictions. This will occur when you apply for a course offered by the College which leads to a regulated profession and when you apply for a place in College-owned accommodation. You will receive further information about this declaration when you are asked to make it.

We ask for this information in order to prevent or detect unlawful acts and to protect vulnerable staff and students.

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

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.

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).

On occasion it may be necessary for the College to transfer your personal data outside of the European Economic Area (EEA). 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.

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 described 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@royalholloway.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