

## Data Protection Act (DPA 2018)

### Privacy Notice

#### 1. What is this document and why should you read it?

- 1.1 This privacy notice explains how and why The Russell Group of Universities including each of its operating entities (also referred to as “**The Russell Group**”, “**we**”, “**our**” and “**us**”) uses personal data about “**you**”.
- 1.2 You should read this notice, so that you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.

#### 2. The Russell Group’s data protection responsibilities

- 2.1 “**Personal data**” is any information that relates to an identifiable natural person. Your name, address, contact details are all examples of your personal data, if they identify you.
- 2.2 The term “**process**” means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.
- 2.3 The Russell Group is a so-called “**controller**” of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.

#### 3. What types of personal data do we collect and where do we get it from?

- 3.1 We collect many different types of personal data for lots of reasons. We cannot administer our relationship with you without your personal data. Where we don’t need your personal data, we will make this clear.
- 3.2 Further details of the personal data we collect, where we get it from and what we do with it are set out in **Schedule 1**.
- 3.3 You provide us with personal data directly when you correspond with us. We also create some personal data ourselves and obtain some personal data from other sources. We obtain it from other people and organisations, including some public sources, such as publicly available directories and online resources. You can read more about the sources of personal data in the more detailed information set out in **Schedule 1**.
- 3.4 If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting Martin Furner, Person with Responsibility for Data Protection (PRDP), at [PRDP@russellgroup.ac.uk](mailto:PRDP@russellgroup.ac.uk).

#### **4. What do we do with your personal data, and why?**

- 4.1 We process your personal data for particular purposes in connection with your engagement with us, and the management and administration of our business.
- 4.2 We are required by law to always have a permitted reason or justification (called a “lawful basis”) for processing your personal data. There are **six** such permitted lawful basis for processing personal data. The table at **Schedule 2** sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.
- 4.3 Please note that where we have indicated in the table at **Schedule 2** that the lawful basis for processing of your personal data is either:
- (a) You have given your consent; or
  - (b) It is necessary for our legitimate interests.

and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our engagement with you.

#### **5. Special category personal data (including criminal data)**

- 5.1 We are required by law to treat certain categories of personal data with even more care than usual. These are called sensitive or special categories of personal data and different lawful bases apply to them. The table at **Schedule 3** sets out the different purposes for which we process your special category personal data and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.
- 5.2 Examples where we may collect special category data about you:
- (a) If you were a guest speaker at a Russell Group event, we may compile a background profile for the other attendees.
  - (b) If you were a guest at a Russell Group event where we were serving food, we would collect information from you about your dietary requirements/preferences and any food allergies you may have.

#### **6. Who do we share your personal data with, and why?**

- 6.1 Sometimes we need to disclose your personal data to other people such as inside the Russell Group (including the 24 member universities) or with other stakeholders for purposes connected with our general business aims.
- 6.2 We may share your dietary requirements/preferences and any food allergies with catering and venue providers
- 6.3 We would never share your private contact details (e.g. your personal mobile telephone number) with others without your consent.

#### **7. Where in the world is your personal data transferred to?**

- 7.1 If any of our processing activities require your personal data to be transferred outside the European Economic Area, we will only make that transfer if:
- (a) The country to which the personal data is to be transferred ensures an adequate level of protection for personal data;

- (b) We have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient (a copy of this could be requested as part of a data subject access request);
- (c) The transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; and
- (d) You explicitly consent to the transfer.

## 8. How do we keep your personal data secure?

We will take specific steps (as required by applicable data protection laws) to ensure we take appropriate security measures to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage. We will also ensure that third parties to whom we disclose your personal data will do so.

## 9. How long do we keep your personal data for?

9.1 We will only retain your personal data for a limited period of time. This will depend on a number of factors, including:

- (a) any laws or regulations that we are required to follow;
- (b) whether we are in a legal or other type of dispute with each other or any third party;
- (c) the type of information that we hold about you; and
- (d) whether we are asked by you to keep your personal data for a valid reason.

9.2 Our data retention policy includes the following table showing when data is scheduled to be deleted:

| Media                            | Retention Period                                      | Exceptions   |
|----------------------------------|---|--|
| <b>Emails and attachments</b>    | 2 years (plus 1 month to be permanently deleted)      | Emails or attachments required for more than 2 years can be saved and managed as 'Documents' (below)   |
| <b>Documents and other files</b> | 5 years (plus up to 1 year to be permanently deleted) | Board papers, briefings, staff data and Russell Group statutory documents and supporting documentation (including company management documents and financial accounts) |

## 10. What are your rights in relation to your personal data and how can you exercise them?

10.1 You have certain legal rights, which are briefly summarised at **Schedule 4**, in relation to any personal data about you which we hold.

10.2 Where our processing of your personal data is based on your **consent**, you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.

- 10.3 Where our processing of your personal data is necessary for our **legitimate interests**, you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.
- 10.4 If you wish to exercise any of your rights please contact our PRDP Martin Furner at [PRDP@russellgroup.ac.uk](mailto:PRDP@russellgroup.ac.uk) in the first instance.
- 10.5 You also have the right to lodge a complaint with the Information Commissioner's Office, which is the UK data protection regulator. More information can be found on the Information Commissioner's Office website at <https://ico.org.uk/>.

## 11. Updates to this notice

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We encourage you to check this notice on a regular basis.

## 12. Where can you find out more?

- 12.1 We have appointed a PRDP whose role is to inform and advise us about, and to ensure that we remain compliant with, data protection legislation. The PRDP should be your first point of contact if you have any queries or concerns about your personal data. Our PRDP is Martin Furner who can be contacted at [PRDP@russellgroup.ac.uk](mailto:PRDP@russellgroup.ac.uk).
- 12.2 If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us and the PRDP is unavailable, you can also contact us in any of the following ways:

By email at: [Enquiries@russellgroup.ac.uk](mailto:Enquiries@russellgroup.ac.uk)

By telephone at: 020 3816 1300

By post at: 5<sup>th</sup> Floor, 50/60 Station Road, Cambridge CB1 2JH

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**Categories of Personal Data**

|    | Type of Personal Data  | Collected From  |
|----|--|---|
| 1) | <b>Contact Information</b>   |   |
|    | <ul style="list-style-type: none"> <li>• Name(s)</li> <li>• Position or role with an organisation</li> <li>• Business address(es)</li> <li>• Business telephone number(s)</li> <li>• Business email address(es)</li> <li>• Private address(s)</li> <li>• Private telephone number(s)</li> <li>• Private email address(es)</li> </ul> | You   |
| 2) | <b>Background Information</b>  |   |
|    | <ul style="list-style-type: none"> <li>• Details of education, profiles to compile profiles to support our business activities (e.g. a meeting or event you are invited to attend)</li> <li>• Career history, experience and skills</li> </ul>   | <ul style="list-style-type: none"> <li>• You</li> <li>• Publicly available information</li> </ul> |

## Purposes of Processing Personal Data

For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

| Purposes of processing  | Categories of personal data | Lawful basis   |  |   |   |   |  |
|---|-----------------------------|--|--|---|---|---|--|
|   |                             | We are permitted to process your personal data because...  |  |   |   |   |  |
|   |                             | 1. You have given <b>your consent</b> to the processing (Please also see <b>paragraph 10.2</b> ) | 2. It is necessary to perform your employment contract | 3. It is necessary for us to comply with a legal obligation | 4. It is necessary for our legitimate interests or those of third parties | 5. It is necessary to protect your vital interests (or those of someone else) | 6. It is necessary to perform a task in the public interest or in our official authority |
| <b>Day-to-day business operations</b>   |                             |  |  |   |   |   |  |
| 1. Implementing, adapting and enhancing systems and processes to develop or improve our business relationship with you  |                             |  |  |   | ✓   |   |  |
| 2. Managing, planning and delivering our business   |                             |  |  |   | ✓   |   |  |
| 3. Publishing external facing materials for public relations purposes such as where we mention you in the context of Russell Group projects and initiatives in our materials, social media posts and press releases |                             | ✓  |  |   |   |   |  |

**Purposes of Processing Special Category Data**

| Purposes of processing   | Special category lawful basis                                    |  |  |
|--|--|--|--|
|  | We are permitted to process your personal data because...        |  |  |
|  | 1. You have given <b>your explicit consent</b> to the processing | 2. It is necessary for our <b>legitimate interests</b> or those of third parties | 3. It is necessary to protect the <b>vital interests</b> of the data subject |
| <b>Invitation to and attendance at Russell Group events</b>  |  |  |  |
| 1. Compilation of a background profile of individuals who are invited to attend Russell Group events as a guest speaker                        | ✓  | ✓  |  |
| 2. Details of special dietary requirements or food allergies because you have been invited to a Russell Group event where food is being served | ✓  |  | ✓  |

## Your rights in relation to personal data

| Your right  | What does it mean?   | Limitations and conditions of your right  |
|---|--|---|
| <b>Right of access</b>  | Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a “data subject access request”).  | If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations.<br>We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, eg privacy and confidentiality rights of other staff.  |
| <b>Right to data portability</b>                                    | Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.  | If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations.<br>This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (ie not for paper records). It covers only the personal data that has been provided to us by you. |
| <b>Rights in relation to inaccurate personal or incomplete data</b> | You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date.<br>We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status. | Please always check first whether there are any available self-help tools to correct the personal data we process about you.<br>This right only applies to your own personal data. When exercising this right, please be as specific as possible.   |
| <b>Right to object to or restrict our data processing</b>           | Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.   | As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.  |
| <b>Right to erasure</b>   | Subject to certain conditions, you are entitled to have your personal data erased (also known as the “ <i>right to be forgotten</i> ”), eg where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.   | We may not be in a position to erase your personal data if, for example, we need it to: (i) comply with a legal obligation, or (ii) exercise or defend legal claims.  |
| <b>Right to withdrawal of consent</b>                               | As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.  | If you withdraw your consent, this will only take effect for future processing.   |