

Birkbeck, University of London

Birkbeck exists to provide life changing educational opportunities for its students and undertake cutting-edge research for the public good. In order to carry out this mission, it is necessary to process personal data.

We take our responsibilities to process your data transparently, fairly, lawfully, safely and securely very seriously. This document is part of our efforts to keep you informed about how we treat your data.

PRIVACY NOTICE

For the purpose of providing IT User Accounts

About Birkbeck

Birkbeck College (also known as Birkbeck, University of London) is the data controller for all of the personal data that it holds and processes and is subject to the General Data Protection Regulations (GDPR). Birkbeck is registered with the Information Commissioners Office (ICO) registration number Z718111X

- Address: Birkbeck College, Malet St, Bloomsbury, London, WC1E 7HX
- Birkbeck's Data Protection Officer can be contacted by emailing dpo@bbk.ac.uk

If you have any queries about how we use your data, or wish to exercise your rights with regard to your data including, making a subject access request, please contact dpo@bbk.ac.uk

About Birkbeck's approach to personal data processing

In common with all universities, Birkbeck processes the personal data of many individuals in order to carry out its mission.

You will find a complete set of information describing our data processing activities, our data privacy policy, relevant privacy notices, information about the rights of individuals whose data we process and how to exercise these rights on our website at www.bbk.ac.uk/privacy.

Birkbeck has many different types of relationship with many different groups of people, and some people have more than one relationship with Birkbeck (for example one person may be both a student and member of staff). It is not possible to provide one single privacy notice that accurately describes all these processing activities. Therefore separate notices are provided that describe each processing activity. It should be noted that more than one privacy notice may apply to the processing of your personal data for different purposes. This should be made clear to you at the point where your personal data is collected. It should also be clearly described within the privacy notice itself. All our privacy notices are available at www.bbk.ac.uk/privacy and if you are in any doubt please contact dpo@bbk.ac.uk.

About our privacy notices

This privacy notice explains how Birkbeck collects, uses and shares personal data and your rights in relation to the that we hold about you. It includes information about how personal data is used, and the nature of any processing by other data processors or controllers.

The processing purpose covered by this notice

This privacy notice applies to Birkbeck's processing of personal data for the purpose of providing IT user accounts (Birkbeck Accounts).

Birkbeck Accounts are potentially used by anyone with a relationship with Birkbeck, including but not limited to; prospective student, applicant, student, former student, alumnus, donor, friend, visitor or prospective, current or former member of staff.

What data we collect

- Birkbeck may obtain, hold and process the following personal data:
 - **Personal details** - including; name, date of birth
 - **Contact details** - including; your personal email address, mobile telephone number
 - **References to other records** – including staff and student identifiers
 - **Birkbeck email addresses and email alias** (where issued)
 - **Security Questions & Answers**
 - **Passwords**
 - **User attributes** – including your roles; organisational location; rights to access services; reasons for service grants and denials
 - **User originated content** – including files and emails created, transmitted and stored in our systems
 - **Usage logs and backups** – including IP addresses, times, dates, locations, details of files, data and URLs accessed

Where we collect it from

- Many user accounts are created based on data originating from another system – e.g. from our Student or HR systems when you are offered a place on a course, or offered a job at Birkbeck.
- Many other user accounts are created at your request (e.g. in order to apply to study) and in these cases information is collected directly from you (online or face to face).
- In all cases data may be updated automatically from data we hold in other systems (e.g. in the event of a name change being recorded) or directly by you (e.g. you change your password online).
- User originated data is collected when you create or save or transmit it through our systems (e.g. you save a file in a file share, send or receive an email)
- Log data is collected automatically by system tools that monitor usage on our systems.
- Backup data (copies of the complete set of data we hold) are collected automatically by a range of methods (typically when data is changed, or on a scheduled basis).

How we use the data

Birkbeck Accounts are necessary to provide secure and appropriately personalised access to a wide range of services and systems, including (but not limited to) online self-service applications such as My Birkbeck, Moodle and other areas of the Birkbeck website; corporate information systems; file and email systems and physical devices.

We use user originated data to provide services to you (i.e. we hold your files and emails so you can access them at times, dates, locations and on devices of your choice).

Routinely communicating with you about the services we provide to you.

Log data is used to monitor system performance and capacity (to aid planning of maintenance and development work), to support investigation of issues and their resolution, and to understand patterns of demand.

We may occasionally need to use your user originated content to support investigation of issues (e.g. if you report a problem with accessing or editing a file held in our file systems, we will access that file to replicate the problem and test proposed solutions). We may also need to use your user originated content for planning and testing of system changes (e.g. we may need to use data on emails sent and received through our systems to test capacity of new systems). In all such cases your user originated content (files and emails) will remain confidentially held, and only accessible to a small number of necessary system engineering staff and strictly only for the purposes outlined above.

We reserve the right to use user account data, including your user originated content and log data for the purposes of disciplinary investigation, crime prevention and detection, and to protect the vital interests of you and others.

Finally we reserve the rights to provide access to your user account to suitably authorised senior staff where they present a clear case that access to data contained within (typically emails and files) is either necessary for the operation of College activities, or for investigatory purposes (e.g. disciplinary investigations).

Under what lawful basis we process your personal data

Birkbeck uses your personal data under different lawful bases depending on the process being performed. The following are the legal bases identified and examples of the data processing activity to which they apply:

- **Public Task** – Birkbeck is a designated public body/charity, processing of personal data is necessary for us to perform our tasks in the public interest and official function in delivering teaching and research. (Article 6 (1) (e)). In order to undertake our public task Birkbeck collects and processes your data to provide access to IT systems.

How long we keep your data for this processing purpose

Certain user facilities will only be accessible to you during a specific period (e.g. during your employment or enrolment). These facilities will cease to be accessible to you at the end of this time, but data may be retained in order to reinstate your account in the event of a resumption of your relationship with Birkbeck within 12 months.

User account data will be kept for 12 months after you cease to have an active relationship with Birkbeck (e.g. application, enrolment, period of employment).

Skeleton data, including usernames and email aliases issued by Birkbeck, and the name and reference identifier of the person to whom it was issued will be retained in perpetuity. This is to maintain the integrity of data held in our systems, and for example to prevent the re-issue of a user account to a different person. Finally this allows us to re-issue the same username and email alias to you should you return to Birkbeck in the future.

Sharing your data with other Data Controllers

In some circumstances we provide the facility for you to gain access to services provided by other (third party) Data Controllers by authenticating using your Birkbeck Account. In these cases your user credentials will be verified by Birkbeck, who will transmit either confirmation or denial to the third party. We may also provide some limited role information to the third party to indicate the type of relationship you have with Birkbeck (e.g. Staff, Student).

Third Party Service Providers (use of Data Processors)

Birkbeck uses a number of carefully selected third parties to provide services on its behalf. In some cases this requires some elements of the data we hold about you to be passed to them for the express purpose of providing a service to you on our behalf. In each case a data sharing agreement is in place that prevents the third party from making any use of the data provided for any purpose other than that expressly agreed, and requiring the provider to securely destroy the data once the service has been provided. Details of these service providers are available at www.bbk.ac.uk/privacy.

International

In some instances the College may transfer personal data to parties located in other countries, including some outside of the European Economic Area (EEA). This may be because either Birkbeck staff, a Data Processor (or Sub-Processor) contracted by Birkbeck, or another Data Controller who data is shared with are located outside the EEA.

All instances of overseas transfers of personal data are subject to appropriate technical safeguards and contractual provisions incorporating appropriate assurances to ensure the security of the data and full compliance with legislative and regulatory requirements.

Your personal data rights

You have the following rights with regard to your personal data held by the College:

- The right to request access to your personal data held by the College.
- The right to have inaccurate or incomplete personal data rectified.
- The right to restrict the processing of personal data – you have the right to block the processing of their personal data by the College in specific situations.
- The right to object – you can object to the processing of your personal data by the College in certain circumstances, including the sending and receipt of direct marketing material.
- The right to object to automated decision making and profiling – you have the right to object to decisions taken by automatic means without human intervention in some circumstances.
- All requests to exercise any of these rights should be made to the College's Data Protection Officer, by emailing: dpo@bbk.ac.uk.

Complaints - If you are unhappy with the College's handling of your personal data or believe that the requirements of GDPR may not be fully complied with, you should contact the College's Data Protection Officer in the first instance. You may also follow the College's

formal complaint procedure, and you also have the right to submit a complaint to the Information Commissioner's Office; further details can be found at www.ico.org.uk.

Version History & Review

This privacy notice will be subject to periodic review. Any material changes will be communicated to those affected in an appropriate manner as and when they are required.

Version	Effective Date	Reason for change
BBKPN006.0	25 May 2018	First version
BBKPN006.1	26 June 2018	Minor corrections