

## **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 promoting College activities and student life**

##### **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](mailto: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](mailto: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](http://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](http://www.bbk.ac.uk/privacy) and if you are in any doubt please contact [dpo@bbk.ac.uk](mailto: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 data 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 showcasing student life and describing our activities to the general public. To engage with the public and potential students meaningfully, Birkbeck uses a range of media and platforms to make it easy for people to understand what it's like to be a part of the Birkbeck community in a number of ways, including, but not limited to:

- attending events and open evenings
- studying
- participating in Birkbeck's alumni community.

The purposes of the processing are to:

- showcase Birkbeck's activities via photography and videography
- describe the student experience via student testimonials
- engage with the public via content generated by non-staff members, such as students and alumni, including, but not limited to: blogs, podcasts, social media activity on official College platforms.

## What data we collect

Birkbeck may obtain, hold and process the following personal data:

- **personal details** – name and age
- **education details** – course details, graduation information
- your **photographic image**
- your **videographic image**
- a **recording of your voice**
- your **testimonial** containing opinions on your experiences at Birkbeck, University of London
- **your opinions, descriptions and comments** in forms including, but not limited to, blog posts, podcasts, social media entries, articles and other public-facing media
- **references to other records** - including staff and student identifiers
- **special category data** – including information about your disabilities where this is made evident via the data captured above, for example, where a photographic image shows a student using a hearing aid, or where a blog post written by a student describes their experience of studying at Birkbeck as a wheelchair user.

For clarity, personal data only applies to photographic and videographic images in which you are the focus of the image or part of a small group in which you are identifiable. Images containing any incidental inclusion is unlikely to constitute as your personal data and therefore this privacy notice does not apply.

## Where we collect it from

- Information will be collected from you during a photo or filming session as part of Birkbeck's consent collection process.
- Information will be collected from you regarding your experiences as part of Birkbeck's consent collection process prior to the content appearing online.

- Information may be updated automatically from data we hold in other systems, for example, if you are a currently enrolled student and have already logged in to a system, some data will be populated based on information already held.
- Information will be entered directly into various systems by you, for example when you post using one of Birkbeck's social media accounts or when you describe your areas of research in My Birkbeck.

## How we use the data

### **Purpose 1: Showcasing Birkbeck's activities via photography, videography and voice recordings**

We will use photographic and videographic images in our online and print marketing materials, including our prospectuses, as well as on social media and other platforms. We will use voice recordings in appropriate media such as podcasts.

### **Purpose 2: Describing the student experience via student testimonials**

We will use student testimonials in our online and print marketing materials, including our prospectuses, as well as on social media and other platforms.

### **Purpose 3: Engaging with the public via content generated by non-staff members**

We will use content created or generated by non-staff members in the medium in which they were originally created (for example, a blog post on the blog for which it was composed) as well as in our online and print marketing materials, including our prospectuses, as well as on social media and other platforms.

## 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:

### **Purpose 1: Showcasing Birkbeck's activities via photography and videography**

### **Purpose 2: Describing the student experience via student testimonials**

### **Purpose 3: Engaging with the public via content generated by non-staff members**

**Consent:** In some circumstances, Birkbeck will only collect and process data on the lawful basis of consent. In these circumstances we will ask you to confirm your explicit consent to our processing the data at point of data collection. (Article 6 (1) (a)).

**Withdrawal of consent:** You have the right to withdraw consent at any time. You can opt out via [www.bbk.ac.uk/myprivacycontrol](http://www.bbk.ac.uk/myprivacycontrol) or by contacting [dpo@bbk.ac.uk](mailto:dpo@bbk.ac.uk).

Note that reasonable efforts will be made to remove personal data wherever it appears upon receipt of withdrawal of consent, but there are circumstances where this may not be possible. For example, where a data subject has consented to their photographic image being used, and it appears in thousands of printed prospectus documents, it is not reasonable for those prospectus documents to be destroyed due to the associated cost and logistical complexity.

Similarly, where an image is shared via social media, upon withdrawal of consent, the image can be removed from systems controlled by Birkbeck, but removing it from posts created by other users is not reasonably practicable.

**Special Category Data** – Birkbeck processes the special category data described in this privacy notice under condition Article 9 (2) (a), explicit consent.

### **How long we keep your data for this processing purpose**

Where consent is withdrawn, and assuming it is reasonably practicable, personal data will not be used again and will be removed from wherever it appears using reasonable endeavours.

In the event where consent is not withdrawn, the information containing the personal data will not be held longer than 10 years, as Birkbeck continues to keep the information on its public-facing presences fresh and relevant.

For Processing Purposes 1, 2, and 3 described in this Privacy Notice, Birkbeck may, technically, retain personal data indefinitely. For example, an image may appear on a printed prospectus document that is never destroyed, or a podcast may remain valid and pertinent for several years.

### **Sharing your data with other Data Controllers**

While the data collected for the processing processes described in this Privacy Notice will not be programmatically shared with other Data Controllers, the public-facing nature of this data and the uses to which it is being put means that some other Data Controllers may gain access to it. For example, when a 'tweet' is added to Twitter, this may be 're-tweeted' or linked through to other social media.

### **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](http://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 Birkbeck's 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 as it applies to Processing Purposes 1, 2, and 3 described in this Privacy Notice:

- 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 erasure of personal data – this will only apply where there is no legitimate reason for the College to continue to process the personal data
- the right to restrict the processing of personal data – you have the right to block the processing of your personal data by the College in specific situations
- the right to data portability – you have the right to request provision of some elements of your information in digital form in order to provide it to other organisations
- the right to withdraw consent – you can withdraw consent to the processing of your personal data by the College at a later date, and reasonable efforts will be made to reduce the personal data processed
- 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](mailto: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](http://www.ico.org.uk).

## Version history and 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
BBKPN014.0	20 June 2019	First draft
BBKPN013.1	28 June 2019	Second draft
BBKPN013.2	30 July 2019	Third draft

