

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 access to Studiosity (a 3rd party online study skills support service)

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

Our privacy notices explain 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 providing Birkbeck students with access to 'Studiosity'.

What data we collect

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

- **Personal details** - name, student ID, email address.
- **Limited enrolment details** – e.g. subject area, programme, level, year of study, department of enrolment.
- **Studiosity utilisation information** – details of times and dates of use and Studiosity service components access/used.
- **Referrals / cause for concern records** – records indicating areas of pastoral or academic concern, together with suggestions for additional services that may be considered beneficial to you.

Where we collect it from

- **Your personal details** will be collected from your student records on sign-up to this service.
- **Studiosity utilisation information, and referrals/causes of concern** will be passed from Studiosity to Birkbeck.

How we use the data

Birkbeck will process your personal data for this purpose in the following ways:

- Having sought and received your informed consent (see lawful bases below), Birkbeck will provide you with access to Studiosity, authenticated using your Birkbeck user account credentials, via single-sign-on from My Birkbeck.
- Each time you access the Studiosity service Birkbeck will pass a limited set of your personal details and enrolment details to Studiosity in order for Studiosity to create or update your account with them.
 - This will include (implicitly) confirmation that you are a Birkbeck student.
 - This will not include your Birkbeck account password.
- Birkbeck will fund your use of the Studiosity service, and provide access to it, only while you remain enrolled at Birkbeck.
- Studiosity is an independent *data controller* in their own right, based in Australia (see section on international data transfer). In opting to use the Studiosity service you are entering into an individual agreement with Studiosity, subject to their terms and conditions.

In addition Birkbeck will receive usage and concern/referral data (where appropriate) from Studiosity:

- To monitor and evaluate the use and effectiveness of our services, to aid capacity planning, and to trouble-shoot problems and issues.
- To monitor your engagement with your studies.
- To assist us in providing certain services and support to you should this be necessary.

Under what lawful basis we process your personal data

For this purpose, Birkbeck uses your personal data on the following lawful basis:

Consent - 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 agreement to the service. (Article 6 (1) (a))

Withdrawal of consent - you have the right to withdraw consent at any time. You can opt out by visiting *My Privacy Control* (directly at www.bbk.ac.uk/myprivacycontrol or via *My Birkbeck* www.bbk.ac.uk/mybirkbeck) at any time. Please note that once accessed, your data will have been shared with an autonomous data controller, who will process your data in accordance with their terms and conditions which you will have agreed with them. We will act on your withdrawal of consent by ceasing to pass your data to Studiosity, ceasing to maintain records of your use (if any of the service), and informing Studiosity of your withdrawal of consent.

How long we keep your data for this processing purpose

Birkbeck will retain your personal data for periods in line with legal and regulatory requirements or guidance. In most cases all data will be held for a period of 6 years after you have ceased your relationship with Birkbeck.

Sharing your data with other Data Controllers

Your personal data will be shared with Studiosity, who will act as the data controller for the purposes of providing their student support services. A data sharing agreement is in place between Birkbeck and Studiosity that ensures the data shared with Studiosity is only used to enable you to enter into an agreement to use the Studiosity service. Any future processing of your personal data by Studiosity is then governed by the agreement you personally enter into with them. Information on Studiosity's approach to privacy and security can be found here studiosity.com/connect/policy_agreements/5/privacy.

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

For this service, your personal data will be transferred to Studiosity who are based in Australia. Information on Studiosity's approach to privacy and security can be found here studiosity.com/connect/policy_agreements/5/privacy.

This transfer of data outside of the European Union is being carried out based on your specific consent.

All transfers of personal data are subject to appropriate technical safeguards (encryption). Birkbeck has a data sharing agreement in place with Studiosity incorporating appropriate assurances to ensure the security of the data and 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 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 their 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 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
BBKPN017.0	31 July 2018	First Version
BBKPN017.1	27 Sep 2018	Final changes required for initial publication
BBKPN017.2	29 Sep 2018	Corrections following DP Group review