

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 tracking usage of our websites and other online services

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 use of monitoring facilities to track your use of our:

- public websites (such as www.bbk.ac.uk)
- online services (such as My Birkbeck, Moodle, Panopto).

These monitoring facilities require the processing of personal data for multiple purposes with two different lawful bases for processing. These are outlined below:

Processing necessary to the function and management of public websites and online services

What data we collect

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

- **Site visits and activity** – including: time and date of use, pages and files accessed, device type (unique device identifiers), referral site, device screen size, browser information, preferred language and search terms used to look for information.
- **User data** – we may collect information about you. This includes the IP address of the computer or device you are using to access our services with (from which we can infer your location) and your username/account ID if you are accessing a service that requires you to log on.

Where we collect it from

- our websites and online services.
- other external websites and systems that we use to deliver key functions to our websites and online services

How we use the data

We use the data to provide a consistent, robust and meaningful online user experience. This may include monitoring the demand for services from different groups of users at different times in the academic year.

Without this data we would not be able to:

- identify and fix bugs in our websites and online services
- provide a user-friendly, accessible and highly available way for people to find and interact with information about Birkbeck, University of London and its teaching, research, public engagement and associated activities

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** – Article 6 (1) (e): For the purposes outlined in this section of this privacy notice, Birkbeck collects and processes your data on the lawful basis of fulfilling its public task as set out in its Charter: to provide education and means for research in academic disciplines.

How long we keep your data for this processing purpose

We may retain your personal data gathered in this way for a period of three years.

Sharing your data with other Data Controllers

In the course of this data processing, we do not share data with any external Data Controllers.

Processing to facilitate targeted advertising and digital marketing campaigns

What data we collect

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

- **Site visits and activity** – including: time, duration and date of use; pages and files accessed; referrer sites (e.g. how you found us - where you came from before you accessed the Birkbeck site) and referral sites (e.g. where you go to from our sites); device type (unique device identifiers); device screen size; browser information; preferred language; the name of the network from which you are visiting the site; visual representations of your interaction with the site
- **User data** – we may collect information about you. This includes the IP address of the computer or device you are using to access our services (from which we can infer your location), and your username/account ID if you are accessing a service that requires you to log on.

Where we collect it from

- This data is collected from:
 - our websites and online services.
 - external websites, including social media sites such as Facebook and Twitter.

How we use the data

We use this data to provide you with:

- an improved user experience when you interact with our systems, based on the greater detail of interaction provided via this means of tracking: for example, how much time you spend on which pages, which links you choose to click, what you do and don't like, etc, enabling us to build and maintain our service with user feedback
- personalised content that is targeted to what we believe will be most relevant to you
- targeted advertising of Birkbeck courses, including advertising on external websites

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 to which data processing activity they apply:

- **Consent** – Article 6 (1) (a): For the purposes outlined in this privacy notice, Birkbeck collects and processes your data on the lawful basis of your explicit consent.

Withdrawal of consent - you have the right to withdraw consent at any time. For more information see www.bbk.ac.uk/privacy or contact our Data Protection Officer dpo@bbk.ac.uk.

How long we keep your data for this processing purpose

We may retain your personal data for a period of three years after our last contact with you.

Sharing your data with other Data Controllers

In the course of this data processing, data is shared with a number of external parties by allowing them to place cookies into a browser session during a visit to one of our websites or online services, or by allowing them to apply other tracking technologies. For more information on the cookies, analytics and other tracking technologies we use, please see: <http://www.bbk.ac.uk/about-us/policies/cookies>

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 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 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 their 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 follow 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
BBKPN003.0	24 May 2018	GDPR additions