

# South-East Doctoral Training Arc (SEDarc)

## Privacy Notice

### Introduction

Royal Holloway and Bedford New College, also known as Royal Holloway, University of London, will act in accordance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA) when controlling and processing your personal data.

Royal Holloway is the managing institution for the South East Doctoral Training Arc which is a partnership of six institutions (Royal Holloway University of London, Kingston University, University of Sussex, University of Kent, University of Reading and the University of Surrey,

SEDarc is funded by the Economic, and Social Research Council (ESRC).

The parties named above are data controllers of your data in respect of the DTP, but Royal Holloway provides this information as the lead institution on behalf of all parties.

This notice explains how we collect, use and share your personal data and your rights in relation to the processing of your data.

In this notice:

- **'personal data'** means any data which can identify you directly or indirectly (whether by itself or when combined with other data), regardless of the format or media on which the data are stored. This includes data that can identify you when combined with other data that is held separately (pseudonymous data) but does not include data that has been manipulated so that you can no longer be identified from it (anonymous data).
- **'processing'** means any activity relating to your personal data including collection, use, alteration, storage, disclosure and destruction.

### What personal data will be collected

The data Royal Holloway collects includes:

- Personal contact details
- Copies of documentation that may be required to demonstrate your eligibility for funding by SEDarc including the residency requirement
- Education, professional qualifications details
- Pre-employment check information including right to work in the UK documentation
- Previous employment and reference details
- Absence records and medical details including sabbatical leave, maternity, paternity and shared parental leave
- Training and development records (including psychometric questionnaires, as required)
- Visual images
- Academic records relating to publications and research grant awards.

Special category data processed may include:

- Age
- Sex
- Sexual orientation
- Disability Pregnancy and maternity
- Ethnic origin
- Physical or mental health details
- Socio-economic data

## Personal data provided by you about others

You may provide us with personal data about other individuals, for example, next of kin/emergency contact details and information about your family circumstances and dependants. You should notify the relevant person that you are providing their contact details to Royal Holloway and in what capacity (i.e. as your listed next of kin/emergency contact).

## How and when do we collect your personal data?

We collect your data:

When we receive your enquiry through any of our online forms.

When you complete an attendance form.

When you contact us by any means with queries etc.

When you book to attend an event, training or apply for a placement.

## Personal data from third parties

We may on occasion receive information about you from third parties such as:

- Your home research institution;
- Other authorised third party organisations providing SEDarc training providers;
- SEDarc's non-HEI partners as they may form part of the application process. This includes general applications in addition to those applying for Supervisor-Led Awards or any other type of ESRC Fellowship.

## Why do we collect this data, how do we use it and what is our legal basis for doing so?

We collect your data in order to:

- Assess your application.
- To meet the evidence requirements of the ESRC and UKRI.
- Ensure equality of opportunity and treatment.
- Process your training booking.
- Process your application to attend SEDarc events.

When you apply to SEDarc for funding, an award, or to take part in any partnership training programmes, we will be required to collect, store, use and otherwise process information about you for any purposes connected with teaching, support, research, administration, your health and safety and for other reasons deemed necessary for the purpose of entering into or for the performance of your contractual agreement.

Processing of your personal data may also be necessary for the pursuit of our legitimate interests or by a third party's legitimate interests – but only where the processing does not fall within our core functions, is not unwarranted and will not cause a prejudicial effect on your rights and freedoms, or legitimate interests.

We may also process your data where it is necessary for compliance with a legal obligation to which Royal Holloway is subject.

In circumstances where you have a genuine choice as to whether we should process your personal data, we will ask you for your **consent**. The method used to obtain your consent will depend on the scope and context of the processing that we propose.

In relation to special categories of personal data and personal data relating to criminal convictions and offences, we may request your **explicit consent** unless a legal exemption applies which allows us to process such personal data without doing so.

## How long Royal Holloway will retain your personal data?

Royal Holloway must only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Specified retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, Royal Holloway has taken into account:

- the nature, sensitivity and volume of the personal data
- the potential risk of harm to you arising from Royal Holloway's continued retention of the personal data
- the purposes for which Royal Holloway may process your personal data
- whether Royal Holloway is required to retain any personal data by law or in accordance with its legitimate interests.

Your data will be kept in accordance with Royal Holloway's Records Retention Policy and Schedule which can be found at <https://www.royalholloway.ac.uk/about-us/more/governance-and-strategy/data-protection/>.

## Sharing your personal data with third parties

Where there is need to do so, we will share your details with relevant parties such as SEDarc partners, other educational bodies, sponsors and event organisers.

Where Royal Holloway uses third parties to process personal data on its behalf (acting as data processors), a written contract will be put in place to ensure that any personal data shared will be held in accordance with the requirements of data protection law and that such data processors have appropriate security measures in place in relation to your personal data.

Parents, family members and guardians are considered to be third parties and your personal data will not be disclosed to such persons unless you have given your consent, or the disclosure is otherwise made in accordance with data protection law.

Please note that in certain circumstances we may need to share your personal information with a regulator or to otherwise comply with the law.

## International Data Transfers

Your data is held in the European Economic Area. Where we need to transfer your data outside of the United Kingdom, those transfers are protected either by 'adequacy regulations' issued by the UK Government (declaring the recipient country as a 'safe' territory for personal data) or by standard contractual clauses issued by the UK Information Commissioner's Office (which give obligations for the recipient to safeguard the data)

## How Royal Holloway keeps your personal data secure

Royal Holloway has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way or altered or disclosed. In addition, Royal Holloway limits access to your personal data to the persons and organisations, including those described above, who have a lawful and/or legitimate need to access it.

Royal Holloway has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where legally required to do so.

## You and your data

You have a number of rights in relation to the processing of your personal data by Royal Holloway:

- **Access:** You have the [right to request access](#) to and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data to check that Royal Holloway is processing it lawfully and fairly.
- **Correction:** You have the [right to request correction](#) of any inaccurate or incomplete personal data held about you.

- **Deletion:** You have the [right to request erasure](#) of any personal data held about you where there is no good reason for Royal Holloway to continue processing it or where you have exercised your right to object to the processing of your personal data.
- **Restriction:** You have the [right to request restriction](#) of how Royal Holloway processes your personal data; for example, to confirm its accuracy or Royal Holloway's reasons for holding it or as an alternative to its erasure.
- **Objection:** You have the [right to object](#) to Royal Holloway's processing of any personal data which is based on the legitimate interests of Royal Holloway or those of a third party based on your particular circumstances. You also have the right to object to Royal Holloway processing your personal data for direct marketing purposes.
- **Portability:** You have the right to receive or [request that Royal Holloway transfers](#) a copy of your personal data in an electronic format where the basis of Royal Holloway processing such personal data is your consent or the performance of a contract, and the information is processed by automated means.
- **Complaints:** You have the right to complain to the [Information Commissioner's Office \(ICO\)](#) in relation to how Royal Holloway processes your personal data. Our registration number with the Information Commissioner's Office is Z7056965.

Royal Holloway may be entitled to refuse any request in certain circumstances and where this is the case, you will be notified accordingly.

Where the lawful ground relied upon by Royal Holloway to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason. However, if you do so, Royal Holloway may not be able to provide some or all of its services to you or the provision of those services may be affected.

You will not have to pay any fee to exercise any of the above rights, though Royal Holloway may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, you will be notified accordingly.

To protect the confidentiality of your personal data Royal Holloway may ask you to verify your identity before fulfilling any request in relation to your personal data.

## Changes to this notice

Royal Holloway may update this notice at any time and may provide you with further notices on specific occasions where we collect and process personal data about you. You should check this notice regularly to take notice of any changes. Where any change affects your rights and interests, we will make sure we bring this to your attention and clearly explain what this means for you.

## Questions or comments

If you have any questions or comments regarding this notice or you wish to exercise any of your rights you should contact our Data Protection Officer by email at [dataprotection@royalholloway.ac.uk](mailto:dataprotection@royalholloway.ac.uk).

You also have the right to complain to the Information Commissioner's Office and you can find more information on their website – [www.ico.org.uk](http://www.ico.org.uk)