**Privacy Notices**

***Page 1 is Information and Checklist***

***Page 2 is the Privacy Notice template ready for you to edit***

**What is a Privacy Notice?**
A Privacy Notice describes to individuals (Data Subjects) when, why and where their information (personal data and sensitive personal data/special categories data) is being used by the University. In order for processing of personal information to be demonstrably fair and transparent, individuals must be provided with a Privacy Notice. Further guidance on [Privacy Notices](https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notices-transparency-and-control/privacy-notices-under-the-eu-general-data-protection-regulation/) is available from the Information Commissioner’s Office (ICO).

**When do I need one?**
The University will produce separate Privacy Notices to Students and Staff which will set out in detail the uses made of their personal data. You should first check whether the use of the information within your project/initiative is already included in these Privacy Notices.

If not, then you will need to provide a specific Privacy Notice to data subjects whose personal information you are processing. It is also important that consideration is given to the legal basis for processing personal information. For further information, please refer to [ICO guidance on lawful basis for processing](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/) and the [interactive tool](https://ico.org.uk/for-organisations/resources-and-support/getting-ready-for-the-gdpr-resources/lawful-basis-interactive-guidance-tool/).

**What should I include?**

There are defined criteria for what must be inclusion in Privacy Notices:

* Identity and contact details of the Data Controller (which will be the University of Glasgow) and the Data Protection Officer.
* Details of the information being processed, the purpose and the legal basis for processing.
* Details of any other organisation or person who may access the data.
* Details of transfers to countries outside the European Economic Area (EEA) and the safeguards in place (e.g. whether a data sharing agreement is in place).
* Information on the retention period or criteria used to determine how long the information will be held.
* Details of applicable data subject rights.
* Where relevant, the existence of automated decision making, including profiling and guidance on how decisions are made, the significance and resultant consequences.
* Where consent is being relied upon as the legal basis for processing, the right to withdraw this consent any time.
* Right to complain to the Information Commissioner’s Office.

**Further information**

<https://www.gla.ac.uk/myglasgow/dpfoioffice/gdpr/>

**Please note all text highlighted in yellow and square brackets should be amended or removed before Privacy Notice is finalised.**

**Privacy Notice for [Insert name of project/processing activity.]**

**Your Personal Data**

***The University of Glasgow*** *will be what’s known as the ‘Data Controller’ of your personal data processed in relation to* [insert details of the processing purpose]. *This privacy notice will explain how The University of Glasgow will process your personal data.*

**Why we need it**

*We are collecting your basic personal data such as [*name, email address/contact details - amend or expand as necessary] and, where relevant, limited special categories data (such as disability, ethnicity, other health data)] *in order to [*insert purpose for processing the data. If information will be used for marketing purposes, this must be explicitly referenced. If data will be used for direct marketing purposes, this must be specified and explicit consent sought]. *We will only collect data that we need in order to provide and oversee this service to you.*

***Legal basis for processing your data***

*We must have a legal basis for processing all personal data. In this instance, the legal basis is [s*elect one from the list below

* Consent – a consent clause needs to be included at the end of the privacy notice
* Contract – details should be provided of the consequences of not providing any information
* Legal obligation – details of the legal requirement should be provided
* Public task/Official authority – this covers activities undertaken as part of the core functions of the University
* Legitimate interests – this should only be used for activities which are not part of the University’s core functions and in this case details should be provided of what interests the University or relevant third party has in the data.

In addition, if special categories/sensitive personal information are being processed, an additional basis needs to be specified – please contact the DP&FOI Office to discuss.]

**What we do with it and who we share it with**

* *All the personal data you submit is processed by staff at the University of Glasgow in the United Kingdom.* [This wording should only be used if the processing will undertaken by UoG in the UK. If data is shared with any third parties, then please amend this sentence and detail who the third parties are here.

In addition,

* If data is transferred outwith the European Economic Area (EEA), detail here. Personal data shared on an open website should be regarded as being shared worldwide and should also be stated. Please also note, many online services have servers that are located outwith the EEA. Clarification should be sought from the service provider on whether or not this is the case and if so details should be included here in the Privacy Notice.
* Also provide details of any relevant security measures that are in place e.g. encryption, pseudonymisation etc.
* Where relevant, information relating to the use of the personal data for decisions based solely on automated decision making, e.g. profiling should also be detailed here]

**How long do we keep it for**

*Your data will be retained by the University for* [insert planned retention period or retention criteria e.g. xx months after the conference has ended or the survey has concluded]. *After this time, data will be securely deleted.*

**What are your** [**rights**](https://www.gla.ac.uk/myglasgow/dpfoioffice/gdpr/datasubjectrights/)**?\***

[Explain that individuals have certain rights: to request access to, copies of and rectification or erasure of personal data and to object to processing. In addition, to restrict the processing of the personal data and to data portability.

If relying on consent to use personal information, this should be made clear to the Data Subject along with their right to withdraw consent at any time].

*You can request access to the information we process about you at any time. If at any point you believe that the information we process relating to you is incorrect, you can request to see this information and may in some instances request to have it restricted, corrected or, erased. You may also have the right to object to the processing of data and the right to data portability.*

[If consent has been selected as the legal basis, include the following statement - Where we have relied upon your consent to process your data, you also have the right to withdraw your consent at any time.]

If you wish to exercise any of these rights, please submit your request via the [webform](https://www.gla.ac.uk/myglasgow/dpfoioffice/gdpr/gdprrequests/) or contact dp@gla.ac.uk.

\*Please note that the ability to exercise these rights will vary and depend on the legal basis on which the processing is being carried out.

**Complaints**

If you wish to raise a complaint on how we have handled your personal data, you can contact the University Data Protection Officer who will investigate the matter.

Our Data Protection Officer can be contacted at dataprotectionofficer@glasgow.ac.uk

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner’s Office (ICO) <https://ico.org.uk/>

[Where the legal basis for processing is consent, a consent clause will need to be included with the Privacy Notice which separately asks for specific consent for all the different aspects to the processing e.g.

􀕿 I consent to the University processing my personal data for the purposes detailed above.

[Or for example]

I agree to my personal information being used for direct marketing purposes and wish to be contacted by the following methods (tick as appropriate):

􀕿 Email 􀕿 Post 􀕿 Text message

I have read and understand how my personal data will be used.

Signed: …………………………………………………………………………………………………………………

Date: ……………………………………………………………………………………………………………………]