

# HEAT Privacy Notice

## Introduction

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

If you have supplied personal information for the purpose of an outreach activity organised by the University, some of that information is added to the University’s [Higher Education Access Tracker \(HEAT\) database](#), which is used to record information about outreach activities and those who take part in them.

This document describes how the information added to HEAT is used by the University (“we” or “us”) as the “data controllers” for that information. This means that we decide how to use your information and are responsible for looking after it in accordance with data protection legislation.

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.
- **‘special category data’** is personal data that needs more protection because it is sensitive. The GDPR defines special category data as personal data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic, biometric, health, sex life and sexual orientation.

We keep this notice under regular review. This notice was last updated on 9<sup>th</sup> November 2023

## What personal data will be collected

The information we hold about you on HEAT comprises the following:

### Personal data

- name;
- gender;
- date of birth;
- post code;
- photographic image

### Special category data

- religion
- ethnicity.
- health data (SEN and disability)

We obtained this data when you took part in outreach events/activities organised by the University. Information about your religion, health and ethnicity is a special category of more sensitive personal data and will only be held if you volunteered it when you took part in an event/activity.

## Personal data from third parties

We may also add to HEAT information about you that we collect from third parties, including the Office for Students (OfS), the Higher Education Statistics Agency (HESA), the University and Colleges Admissions Service (UCAS), the Department for Education (DfE), Education and Skills Funding Agency - GOV.UK(ESFA). This information may contain statistics about the area in which you live, for example, how many people from your area go on to higher education. Data from these sources will also allow us to track your own educational journey from school to higher education, for example, which university you end up at and what type of degree you obtain.

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

We use the data defined above for the following purposes:

- monitoring and evaluating the effectiveness of our outreach programmes;
- producing statistics, including event application and participation numbers, and participant outcomes; and
- tracking future outcomes of event participants, including applications to the University and other Higher Education Institutions.

Using your data for these purposes is necessary for tasks that we carry out in the **public interest** (promoting and widening access to Higher Education) and to meet our **legitimate interests** in promoting applications to the University from under-represented groups.

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, we may request your **explicit consent** unless a condition applies which allows us to process such personal data without doing so.

## How long the University will retain your personal data

The University 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.

Providing high quality outreach activities means being able to compare our activities and to determine which ones best help students to move on to Higher Education and employment. How long this takes will vary depending on your age at the time of participation in an outreach activity.

In order to conduct long-term evaluation, tracking and research about access to Higher Education, we will retain your data for as long as we need it to meet the purposes set out above.

## Sharing your personal data with third parties

HEAT is a shared database used by a variety of organisations to identify which activities are most helpful in preparing students for higher education and progressing to employment. Users of HEAT include:

- Schools and departments of the University that organise outreach activities. They will have access to your personal data contained in HEAT for the purposes set out above.
- Entities associated with the University, including student led organisations such as OUSU and educational charities, and your school, college and/or training organisation. These organisations will only have access to your personal data contained in HEAT if they were involved in organising an outreach event which you attended.

We may also share your data with HESA, UCAS, DfE and SFA to help determine whether our activities are helping participants move on from school into Higher Education and employment.

Where the University 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.

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

There may be occasions when the sharing explained above involves the transfer of your data outside the UK and EEA, for example, to a service provider based overseas. Such transfers will only take place if one of the following applies:

- the country receiving the data is considered by the UK and EU to provide an adequate level of data protection;
- the transfer has your consent;
- the transfer is necessary for the performance of a contract with you or to take steps requested by you prior to entering into that contract; or
- the transfer is governed by approved contractual clauses.

## How the University keeps your personal data secure

The University 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, the University 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.

The University 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 the University:

- **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 the University 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 the University 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 the University processes your personal data; for example, to confirm its accuracy or the University's reasons for holding it or as an alternative to its erasure.
- **Objection:** You have the [right to object](#) to the University's processing of any personal data which is based on the legitimate interests of the University or those of a third party based on your particular circumstances. You also have the right to object to the University processing your personal data for direct marketing purposes.
- **Portability:** You have the right to receive or [request that the University transfers](#) a copy of your personal data in an electronic format where the basis of the University 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 the University processes your personal data. Our registration number with the Information Commissioner's Office is Z7056965.

The University 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 the University 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, the University 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 the University 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 the University may ask you to verify your identity before fulfilling any request in relation to your personal data.

## Changes to this notice

The University may update this notice at any time. 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)