

# **Privacy Notice: Board of Trustees**

### 1. Introduction

This Privacy Notice explains for Trustees the personal data the University of London will collect in relation to their role and what we will do with it.

The University of London is the data controller for the personal data we process. When necessary for the business of the University, we sometimes share the personal data of Trustees with third parties who act as separate data controllers. We do this in accordance with the requirements of UK Data Protection Law. The University is registered with the Information Commissioner's Office [notification number is <u>Z5419651</u>] and has a Data Protection Officer, who is the University's Head of Data Protection and Information Compliance.

If you have any queries regarding the use of your personal data you can contact our Data Protection Office at <u>data.protection@London.ac.uk</u>. You can find out more on our data protection webpage at <u>Data Protection</u> | <u>University of London</u> or you can contact the Central Secretariat, which provides support for the Board of Trustees and the governance of the University, at <u>Secretariat@london.ac.uk</u>

One of our responsibilities as the controller for your personal data is to tell you about the different ways we collect and use your personal data, including the legal bases for which we process your data as defined in UK data protection law.

This privacy notice provides details about the ways we collect and use your personal data. In addition to this statement, you may be given further information about the uses of your personal data at the point that we collect it from you.

## 2. What information do we collect from you?

We hold and process personal data about current and former Trustees of the University. This could include special category data of a more sensitive nature (for example, relating to disclosed disabilities).

The personal data we hold about you consists of:

- Salutation
- Legal first names
- Preferred first name
- Surname or family name
- Date of birth
- Home address
- Address for correspondence
- Nationality
- Country of residence
- National Insurance number
- Telephone number
- Email address
- Details of directorships or Trusteeships held at other organisations (with company/charity number) and data relating to Trustees interests required for the University's Register of Interest
- Biographical details

- Photo images
- Attendance at Board and committee meetings
- Health and disability information
- Data required for Equality, Diversity and Inclusion monitoring
- Passport or other identity document

## 3. Why do we collect this information?

The University collects and processes personal data for the reasons given below and in accordance with these legal bases. You can find out more information about the legal bases for processing personal data <u>on the ICO</u> <u>website</u>.

### Data collected and processed for the performance of tasks in the public interest.

The University uses data to perform tasks in the public interest when it ensures the effective governance of the University. We process personal data to perform a task in the public interest when we carry out these activities:

- **Nominating Trustees:** The University's Nominations Committee will make recommendations for appointment and reappointments of independent members of the Board of Trustees
- **Searching for potential Trustees:** The University may use a third-party recruiting company to locate and suggest potential candidates for Trustees.
- **Register of Interests:** The University maintains a Register of Interests in line with the University's Conflicts of Interest Policy and Disclosure Procedure and will collect and store personal data of Trustees as necessary within it.
- **Trustee attendance at Board and committee meetings:** The University records minutes of meetings which are regularly published on the website. This includes the names of attendees.

#### Data collected and processed to support the University's legitimate interests.

The University collects and processes data about Trustees in support of our legitimate interests, as well as in your own These purposes will never override your personal interests, nor your fundamental rights and freedoms in relation to your personal data. We process on a legitimate interest basis when we carry out these activities:

- We collect data about you when you visit the University of London's premises in order to give you access to the building with a visitor's pass.
- You may also be recorded on our CCTV system which operates in and outside the building, and in accordance with the University's CCTV policy for the purposes of health and safety, and the prevention and detection of crime.
- If you access our Wi-Fi networks we will monitor your usage in accordance with our <u>Acceptable Use</u> <u>Policy</u>.
- The Central Secretariat maintains relevant personal data for each Trustee to help manage your relationship with us as a Trustee.
- The University provides a photo and short biography for each of its Trustees on the University website (see <u>Board of Trustees | University of London</u>).
- The University collects and analyses statistical information on staff, students and Trustees in order to

analyse and improve its services.

### Data collected and processed with your consent.

We collect data about you when you access our website. You will be shown the <u>privacy notice</u> the first time you access the site and will be given the opportunity to consent to the use of cookies and set your preferences.

### Data collected and processed to comply with a legal, statutory and regulatory obligation.

We collect data relating to disabilities to meet our obligations under the Equality Act (2010), other social protection (including health and safety) law, and our own <u>Equality and Inclusion Strategy</u>. If you claim expenses we will process those claims in accordance with the University's Financial Regulations and associated legal requirements. We are also required to collect and monitor information on actual or potential conflicts of interest including related party transactions.

### Special Category data collected and processed for reasons of substantial public interest

We may collect special category data as part of the process of nominating suitable Trustees for the University. This data is used as part of our equality, diversity and inclusion monitoring activities in support of our public sector equality duties.

### Processing necessary for statistical purposes

The University makes statutory annual statistical returns to the Higher Education Statistics Agency (HESA), who collect and publish data about Higher Education in the UK, and the Office for Students (OfS) who is the independent regulator of Higher Education in England. You can find more detail about this at Section 6 of this Privacy Notice.

## 4. What do we do with this information?

We collect your data directly from you when you apply to be a Trustee. We also collect and generate data at various times during your time with the University. We may collect data from third parties as part of the nominations process.

Data is stored in the University's cloud hosted Microsoft environment and in cloud hosted systems used to support the work of the Central Secretariat team, such as Decision Time. The University has carried out due diligence to make sure this third party stores data in line with data protection expectations.

The University processes personal data in accordance with data protection legislation and our own <u>Data</u> <u>Protection Policy</u>

## 5. How long do we keep your information?

We keep your personal data in accordance with the University's retention schedules. This means that:

- Personal data relating to nominations of unsuccessful candidates is kept for 1 year
- Personal data relating to nomination of Trustees, Trustee personal files, and personal data recorded within records of committees to which Trustees are members are kept permanently for historical interest
- We keep data relating to expense claims for 6 years plus the current year
- Special category data relating to disabilities is kept for six years from the conclusion of your time as a Trustee before being destroyed

• Images are retained on our CCTV system for 30 days before being destroyed.

# 6. Who do we share your information with?

### Third parties who provide software and host data on behalf of the University:

As mentioned above, the University uses third parties to provide externally hosted software. The University has carried out due diligence to make sure third parties store data in line with data protection expectations and that there is are appropriate data processor agreements in place as part of our contractual controls..

### Carrying out due diligence:

The University is required to collect, process, and sometimes share personal data of Trustees for due diligence processes. This can be in relation to donations, trusts and other charitable income, as well as for the purpose of compliance and *"know your customer"* checks which banks and other financial institutions carry out. This is because Trustees are deemed to be controllers and beneficial owners of the University.

In some cases, we might need to collect additional information directly from you as we have not stored the requested information on your personal file. The University will liaise with you directly in these cases.

Once data is provided to these bodies it is processed according to their respective privacy notices. These bodies will use the data to carry out checks with external organisations, which can include credit reference agencies, electoral rolls, and fraud prevention databases. They may provide data to HMRC and law enforcement agencies as explained in their privacy notices.

The University assesses each request for data from bodies for this purpose to ensure that disclosure doesn't breach data protection principles. Where data is passed outside the UK, the University will take the relevant steps to ensure there is an appropriate legal basis and adequate protection in place.

#### **Freedom of Information:**

The University is subject to the Freedom of Information Act 2000 and information about Trustees is sometimes be requested and maybe provided to comply with this legal obligation if there is sufficient public interest and no applicable exemption. In most cases the disclosure of personal information is exempt from Freedom of Information requests because its release would breach the data protection principles.

#### Making statistical returns:

The University is required to make statutory annual statistical returns to the Higher Education Statistics Agency (HESA) who collect and publish data about Higher Education in the UK, and the Office for Students (OfS) who is the independent regulator of Higher Education in England. HESA collects the returns on behalf of OfS. Data is shared with HESA via a secure upload to HESA servers. Disclosure is voluntary. The personal data required for this return cover the areas listed below.

- Salutation
- Legal first names
- Preferred first name
- Surname or family name
- Date of birth
- Telephone number
- Email address
- Details of directorships or Trusteeships held at other organisations (with company/charity number)
- Sexual identification
- Disability

- Ethnicity
- Gender reassignment
- Religion/belief
- Sexual orientation
- Nationality
- Highest qualification held

Once data is provided to HESA and OfS it is processing according to their respective privacy notices: <u>Privacy</u> <u>information | HESA</u> and <u>OfS privacy</u>.

## 7. What rights do you have in relation to the way we process your data?

As an individual whose data we process (a data subject), you have certain rights in relation to the processing. You can find detailed information about <u>your rights as a data subject.</u>

You have the right to:

- Withdraw your consent for us to process your personal data where we have relied on that consent as our basis for processing your data.
- Ask us to confirm that your personal data is being processed and to gain access (i.e. have a copy) of that data as well as to be provided with supplemental information about the processing.
- Request that we rectify any inaccuracies where the data we hold on you is inaccurate or incomplete.
- Have your data erased by us, although in certain circumstances we may not be able to do this. The circumstances where this applies can be found in the <u>guide to data subject rights information</u>.
- Restrict the processing of your personal data in certain ways.
- Obtain your personal data for reuse.
- Object to certain processing of your personal data.

If you would like to exercise any of your rights, you can do so by contacting us at <u>data.protection@London.ac.uk</u>

#### Make a complaint

If you have any concerns about the way that we have handled your personal data please <u>email the Data</u> <u>Protection team</u> or the <u>Central Secretariat</u> so that we can endeavour to resolve any issues that you have. resolve your concerns.

If you're still unhappy, you have the right to <u>complain to the Information Commissioner's Office</u> (an independent body set up to uphold information rights for the UK) about the way in which we process your personal data.