



Privacy Notice for individuals whose personal data is collected as part of a research study undertaken by St Antony's College's research centres

A summary of what this notice explains

St Antony's College is committed to protecting the privacy and security of personal data.

This privacy notice applies to anyone whose personal data is collected by St Antony's College as part of a research project. This group will include:

- 1. Individuals who have participated in a research project conducted by a research centre in St Antony's College.**

This notice explains what personal data St Antony's College holds about you, how we use it internally, how we share it, how long we keep it and what your legal rights are in relation to it.

This notice also explains the lawful basis on which we process your data.

For the parts of your personal data that we generate about you, or that we receive from others, this notice also explains the sources of the data.

What is your personal data and how does the law regulate our use of it?

"Personal data" is information relating to you as a living, identifiable individual. We refer to this as "your data".

"Processing" your data includes various operations that may be carried out on your data, including collecting, recording, organising, using, disclosing, storing and deleting it.

Data protection law requires us:

- To process your data in a lawful, fair and transparent way;
- To only collect your data for explicit and legitimate purposes;
- To only collect data that is relevant, and limited to the purpose(s) we have told you about;
- To ensure that your data is accurate and up to date;
- To ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- To ensure that appropriate security measures are used to protect your data.

St Antony's College's Contact Details

If you need to contact us about your data, please contact:

The Data Protection Officer
St Antony's College
62 Woodstock Road
Oxford
OX2 6JF

dpo@sant.ox.ac.uk

The lawful basis on which we process your data

The law requires that we provide you with information about the lawful basis on which we process your personal data, and for what purposes. In the context of research, the lawful basis upon which we will process your personal information is usually where "Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller".

We may collect the following type of personal data about you:

1. Information that helps identify you:
 - Your name & date of birth,
 - Contact information (address, email, phone number),
 - National Insurance Number (or other Tax Identification number),
 - Passport Number (or National Identity Card details),
 - Country of domicile & nationality.
2. Information relating to your education & employment history:
 - The school(s), sixth form(s)/college(s) & other Universities you've attended,
 - Dates of Study & examination results,
 - Places of work & vocational qualifications achieved.
3. Information about your family or personal circumstances, where this is relevant to the research study you are taking part in.
4. Sensitive personal data, including:
 - Information concerning your health & medical conditions,
 - Information about your racial or ethnic origin, religion or political beliefs & sexual orientation,
 - Certain criminal convictions,

- Other information relevant to the research study you are taking part in.

How we apply further protection in the case of “Special Categories” of personal data

"Special categories" of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. Where we also collect and use Special Category data we only do so where “the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes... which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject”.

The Special Categories of personal data consist of data revealing:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership.

They also consist of the processing of:

- genetic data;
- biometric data for the purpose of uniquely identifying someone;
- data concerning health;
- data concerning someone's sex life or sexual orientation.

The safeguards are that the processing must (a) not be likely to cause substantial damage or substantial distress to you or another individual; and/or (b) must not be carried out for the purposes of measures or decisions with respect to you or another individual, unless the purposes for which the processing is necessary include the purposes of approved medical research. In addition, the processing must also be in the public interest.

We have in place an appropriate policy document and/or other safeguards which we are required by law to maintain when processing such data.

Criminal convictions and allegations of criminal activity

Similar legal controls apply to data relating to criminal convictions and allegations of criminal activity. We may process such data on the same grounds as those identified for “special categories” referred to above.

Details of our processing activities, including our lawful basis for processing

We have prepared a detailed table setting out the processing activities that we undertake, the source of the data, the reasons why we process it, how long we keep it and the lawful basis we rely on (in addition to the lawful basis on which we originally collected the data). The table can be found at <https://www.sant.ox.ac.uk/about-st-antonys/how-we-use-your-data>.

We will process your personal information for a range of purposes associated with the research study you are taking part in. The primary purposes are:

- To use your information along with information gathered from other participants in the research study to seek new knowledge and understanding that can be derived from the information we have gathered
- To summarise this information into written form for the purposes of publication. Any information published will be at a summary level and will be fully anonymised and there will be no way of identifying your individual personal information within the published results,
- To use the summary and conclusions arising from the research study for teaching and further research purposes. Any information used in this way will be at a summary level and will be fully anonymised. There will be no way of identifying your individual personal information from the summary information used in this way.

The type of personal information collected and used will depend on the particular research objectives of the project you are taking part in. However what we collect will always be proportionate to achieving those objectives. Details that are not necessary will not be asked for or collected. The Participant Information Sheet will inform you of what information will be collected about you.

We have to ensure that it is in the public interest when we use personally-identifiable information from people who have agreed to take part in research. This means that when you agree to take part in a research study, we will use your data in the ways needed to conduct and analyse the research study. Thus, in general terms, we use your personal information (including, where appropriate, sensitive personal information) to carry out academic and/or translational research in the public interest.

How we share your data and the safeguards we apply to such sharing

We will not sell your data to third parties. We will only share it with third parties if we are allowed or required to do so by law.

Your information will usually be shared within the research team conducting the project you are participating in. You will be made aware in the Participant Information Sheet if there are collaborators or third parties that are not employed by the College who will also access your information.

The policy we apply to those organisations to keep your data safe and protect your privacy is:

- We provide only the information they need to perform their specific services,
- They may only use your data for the exact purposes we specify in our contract with them,
- We work closely with them to ensure that your privacy is respected & protected at all times,
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are our employees, agents, contractors where there is a legitimate reason for their receiving the information, including:

- Third parties who are working with the University as part of the research study you are taking part in as contributors to the research study,
- Third parties who provide IT support for the research study,
- Internal & external auditors.

Sharing your data outside the European Union

The law provides various further safeguards where data is transferred outside of the EU.

We may transfer your data outside the European Union, but only for the purposes of research and provided:

- There is a decision of the European Commission that the level of protection of personal data in the recipient country is adequate; or
- Appropriate safeguards are in place to ensure that your data is treated in accordance with UK data protection law, for example through the use of standard contractual clauses; or

- There is an applicable derogation in law which permits the transfer in the absence of an adequacy decision or an appropriate safeguard.

Automated decision-making

We do not envisage that any decisions will be taken about you based solely on automated means, however you will be informed through the Participant Information Sheet if the specific research study or project you are participating in involves any automated decision-making that affects you.

How long we keep your data

You have already been told through the Participant Information Sheet about the long-term use (and, where applicable, re-use) and retention of your personal information in connection with the specific research study or project you are participating in. General information about how long different types of information are retained by the College is set out in our Record of Processing Activity, which can be found at <https://www.sant.ox.ac.uk/about-st-antonys/how-we-use-your-data>.

Your legal rights over your data

Subject to certain conditions set out in UK data protection law, you have:

- The **right to request access** to a copy of your data, as well as to be informed of various information about how your data is being used;
- The **right to have any inaccuracies in your data corrected**, which may include the right to have any incomplete data completed;
- The **right to have your personal data erased** in certain circumstances;
- The **right to have the processing of your data suspended**, for example if you want us to establish the accuracy of the data we are processing.
- The right to receive a **copy of data you have provided to us**, and have that transmitted to another data controller (for example, another University or College).
- The **right to object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- The **right to object to the processing of your information** if we are relying on a “legitimate interest” for the processing or where the processing is necessary for the performance of a task carried out in the public interest. The lawful basis for any particular processing activity we carry out is set out in our detailed table of processing activities at <https://www.sant.ox.ac.uk/about-st-antonys/how-we-use-your-data>.

- The **right to object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.
- Where the lawful basis for processing your data is **consent**, you have the **right to withdraw your consent at any time**. When you tell us you wish to exercise your right, we will stop further processing of such data. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent. You may withdraw your consent by contacting the College Data Protection Officer:

The Data Protection Officer
St Antony's College
62 Woodstock Road
Oxford
OX2 6JF
dpo@sant.ox.ac.uk

Further guidance on your rights is available from the Information Commissioner's Office (<https://.ico.org.uk/>). You may also wish to contact the St Antony's College's Data Protection Officer at the address above if you are considering how or whether to exercise your rights.

It is important to understand that the extent to which these rights apply to research will vary and that in some circumstances a right may be limited if implementing it would prevent or seriously impair the research outcomes. If it is considered necessary to refuse to comply with any of your data protection rights you will be informed of the decision within one month

You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office if you believe that your data has been processed unlawfully.

Future changes to this privacy notice, and previous versions

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes, if the University makes changes to its procedures, or to make St Antony's College's operations and procedures more efficient. If the change is material, we will give you not less than two months' notice of the change so that you can decide whether to exercise your rights, if appropriate, before the change comes into effect. We will notify you of the change by contacting you by e-mail or post.

You can access past versions of our privacy notices at

<https://www.sant.ox.ac.uk/about-st-antonys/how-we-use-your-data>.

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Next review date: May 2019