

Research Participant Privacy Notice

Introduction

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

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

Specific information about the personal data which will be collected from you will be provided by the researcher via the Participant Information Sheet or similar. The researcher will only collect the minimal amount of data necessary for their project.

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 dependents. You should notify the relevant person that you are providing their contact details to the College and in what capacity (i.e. as your listed next of kin/emergency contact).

How and when do we collect your personal data?

We will collect your personal data when you provide it to us during the course of the research project you have agreed to participate in. This includes data which you directly provide to the researcher and information which is generated as a result of your participation in the project.

Personal data from third parties

If you have given your permission, we may on occasion receive information about you from third parties. This will depend on the individual piece of research and the researcher will provide you with more information about this.

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

We collect your personal data in order to conduct research and our primary legal basis for doing so is that it is part of our task as a university to conduct research in the public interest. Where this research relies upon special category data, the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

There may be occasions when we process personal data for research purposes on grounds other than a task in the public interest. Where this is the case, the researcher will inform you of this on the Participant Information Sheet.

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.

You are not obliged in any way to provide us with your personal data for the purposes of research but you may not be able to participate in a study if you do not.

How long the College will retain your personal data

The College 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, the College has taken into account:

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

Your data will be kept in accordance with the College's Records Retention Policy and Schedule.

Where your data has been anonymised and is therefore no longer attributable to you as an individual, it may be kept indefinitely.

CCTV and automatic number plate recognition (ANPR)

The following information only applies if you are required to visit our campus in order to participate in a research study.

The College has a comprehensive, image-only CCTV surveillance system across its campus. Cameras located on and within buildings are monitored by Security. On occasions, Security staff will wear Body

Worn Cameras in the course of their duties. These cameras record both images and sound, and data captured in this manner is processed in compliance with GDPR.

College uses ANPR (Automatic Number Plate Recognition) camera technology to manage, control and enforce parking on its sites. They are governed under guidelines from the Information Commissioner's Office on the use of CCTV and ANPR Cameras and are operated by College's Security team. In exceptional circumstances this information may be used as evidence in disciplinary cases.

Sharing your personal data with third parties

Where the College 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.

Specific details about data sharing with third parties will be provided on your Participant Information Sheet.

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

Most personal data about you, including your personnel file, will be stored on servers within the UK or elsewhere within the European Economic Area (EEA).

On occasion it may be necessary for the College to transfer your personal data outside of the European Economic Area (EEA). This will only take place in circumstances where there are appropriate and adequate safeguards in place which incorporate appropriate assurances to ensure the security of the information and compliance with legislative and regulatory requirements.

How the College keeps your personal data secure

The College 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 College 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 College 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 College:

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

However when you provide your personal data for the purposes of research, these rights may be limited in order to protect the integrity and accuracy of the research. We may not be able to remove your personal data from the study and, where it has already been anonymised, it will be impossible for us to do so.

This does not affect your right to cease participating in a research project at any time.

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

Changes to this notice

The College 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.

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