

## PRIVACY NOTICE FOR STUDENTS AND PROSPECTIVE STUDENTS

### About this document

This Privacy Notice (**Notice**) explains how Imperial College London (the **College, we, our, us**) processes the personal data of our students and prospective students (which includes students of our evening and lunchtime programmes and our Executive Education Programmes) (**you, your**) and your rights in relation to the personal data we hold.

We also hope and expect that our relationship with students will continue once they leave the College. Our privacy notice aimed at alumni can be found via the following - [Alumni Privacy Notice](#).

For the purposes of any applicable data protection laws in England and Wales, including the Data Protection Act 2018 (DPA) the UK General Data Protection Regulation (UK GDPR) and General Data Protection Regulation EU 2016/679 (EU GDPR), the College is the data controller of your personal data. The College has appointed a Data Protection Officer, who can be contacted via email at [dpo@imperial.ac.uk](mailto:dpo@imperial.ac.uk), via telephone on 20 7594 3502 and via post at Imperial College London, Data Protection Officer, Faculty Building Level 4, London SW7 2AZ. For more information about the College's data protection policies and practices please refer to our Data Protection webpage <https://www.imperial.ac.uk/data-protection/>

### How your personal data is collected

The College collects your personal data from the following sources:

- from you, typically when you:
  - interact with us before joining as a student, for example when you provide your contact details for open day events or when you apply to study at the College;
  - enrol as a student with us, as part of the student registration process;
  - complete our surveys and feedback forms;
  - interact with us during your time as a student of the College, including in communications you have with the College; or
  - visit the College's website, including when you register or use our online payment portals or store;
  - when you request information / assistance via an online form.
- from third parties such as:
  - institutions such as your school or employer when they provide a reference for you;
  - the Universities and College Admissions Service (UCAS), from whom we may receive your application to study at the College where you are applying to study on an undergraduate course (UCAS's privacy policy can be accessed via its website [here](#));
  - other institutions involved in joint and exchange programmes you are undertaking or applying to undertake (including institutions providing clinical training components in medical education);
  - our contractors and service providers who perform services on our behalf, many of which are outlined in this Notice;
  - other relevant third parties such as the Student Loans Company.

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- Affiliate partners that you have consented / requested to provide Imperial with your data. This could include recruitment fair providers, partnership websites and student mailing lists.

## **What categories of personal data are collected?**

We collect the following categories of personal data:

### Identification and contact details

- biographical information such as your name, salutation, title, date of birth, age and gender;
- your image and likeness (as captured in a photograph or on CCTV);
- your contact details including address, email address and phone number;
- information that evidences periods of residency (such as utility bills, proof of mortgage and travel) or financial circumstances (such as bank statements and proof of income);
- information that evidences your family relationships (such as a birth, adoption, marriage or civil partnership certificate);
- national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality. We will also allocate you a unique student number and username;
- where appropriate, diversity and background information that you provide to us.

### Student life and academic

- the courses you have completed, dates of study, examination results and attendance record. We will also keep records relating to assessments of your work, details of examinations taken, your predicted and actual examination grades, disciplinary and other information in your student record;
- information relating to your education and employment history, the school(s), colleges or universities you have attended and places where you have worked;
- information about your family or personal circumstances (including welfare information), and both academic and extracurricular interests, for example where this is relevant to the assessment of your suitability to receive a place on a course, a bursary or scholarship, or in order to provide you with appropriate pastoral care and welfare support;
- records of communications sent to you by the College or received from you;
- records of your attendance at College events (including participation in online events), for example the College's open days or student events and lectures.

### Online and transactional

- details of your IP address, browser type and operating system when you visit our website. See the College [Use of cookies notice](#) for more information.;
- Details of your interactions with digital advertising.
- details of financial transactions e.g. for courses, products and services we have provided. We may also collect the following special categories of personal data where it is necessary for

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the purposes set out in this Notice (please also see the section on Special categories of personal data for details about how we process this data):

- information concerning your health and medical conditions (e.g. disability and dietary needs);
- certain criminal convictions (please see the section on Criminal Convictions under the Special categories of personal data) or criminal acts caught on our CCTV cameras; and
- information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation.

## **The basis for processing your data, how we use that data and with whom we share it**

We will process your personal data either in ways you have consented to, or because it is otherwise necessary for a lawful purpose. We set these out as follows:

### As part of the contractual relationship between you and the College

In this respect we use your personal data for the following purposes:

- administration of your application to the College including to evaluate your suitability for admission and to determine any support requirements/arrangements to enable you to study at the College (please also see the section on processing Special categories of data);
- The recording of interview videos, to be conducted by Imperial staff during the recruitment/application process (see [here](#) for more information);
- admission, registration and administration of your studies including the requirements of the Student Online Evaluation Survey (SOLE);
- production of student photo ID cards and administration of College security;
- academic assessment;
- administration of complaints and appeals, disciplinary hearings, and fitness to practice hearings;
- administration of your social and sporting activities (e.g. relating to your use of the College's sports facilities);
- provision of College accommodation (including catering services) and other support services such as those of the Library and the Careers Service;
- consideration and granting of awards, scholarships, prizes and bursaries (including the publication of awards and marks and inclusion in pass lists made available via the College's website);
- processing and recovery of accounts and fees, including your tuition fee liability;
- administration of employment contracts where you are employed by the College. If you are employed by the College we will provide you with a separate privacy notice explaining how we use your personal data as an employer;
- administration of placements with partner institutions or organisations;
- administration of the College's regulations, codes of practice and policies;
- organisation of events and services (including where applicable after you leave the College), and the provision of products that you have requested or ordered from us.

As part of this process, we will expect to share your personal data with:

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- our agents and contractors (including providers of our student accommodation, catering, IT, and other support services) where they need to receive the information in order to perform the services or provide the products we have agreed to provide to you; 4
- providers which the College may engage for the provision of payments to/from the College, or for the provision of portals to view documents related to student fees;
- third party contractors who assist us in our recruitment process, for example:
  - Kira Talent (<https://www.kiratalent.com/>), who will provide you with an online account if we need to conduct a video interview with you; and
  - external interviewers and reviewers with whom we share application forms and video interviews;
  - AIP Media, who we work with to deliver our aid media advertising.
- partner institutions and other bodies involved in the delivery of a course or programme e.g. affiliated colleges, NHS partners or industry partners;
- UCAS;
- sponsors, including the UK research councils, the Student Loans Company and external bodies and individuals who have funded student prizes, financial loans and awards;
- external examiners and providers of anti-plagiarism software / services;
- debt collection agencies where necessary; and
- relevant professional bodies where a programme of study leads to a qualification recognised by that body (e.g. the General Medical Council).

## Other legitimate interests

Your personal data will also be processed because it is necessary for the College's legitimate interests or the legitimate interests of a third party. This will always be weighed against your rights, interests and expectations.

Examples of where we process data for purposes that fall under legitimate interests include:

- administration of the College's ongoing relationship with you in ways which are necessary to provide your chosen course and welfare;
- publishing your name in the graduation programme and on graduation merchandise (if you do not want your name to appear in the graduation programme or on graduation merchandise please contact the Graduation Team ([graduation@imperial.ac.uk](mailto:graduation@imperial.ac.uk));
- sharing your information with:
  - the Imperial College Students' Union for the administration of Union membership and membership rights while you are at the College (such as for the purpose of giving you access to Union services and facilities, creating electoral rolls and managing Union elections, sending you updates and information about Union services and activities via email, creating reports and producing statistics to help improve the provision of services) and after you finish your studies with the College (such as for the purpose of giving you access to alumni services). In addition, your information may be shared with the Imperial College Students' Union for use on graduation merchandise (as explained above, please contact the Graduation Team if you do not want your name to appear on graduation merchandise);

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- Higher Education Degree Datacheck (HEDD), a shared service which allows employers or statutory bodies and their agents to verify basic degree and enrolment information about you. Information about the use of HEDD can be found via its website. An employer or agent who makes an enquiry about you is required to gain your consent before using HEDD to check your details. You are able to exclude your information from HEDD by emailing [student.records@imperial.ac.uk](mailto:student.records@imperial.ac.uk);
- Graduate Management Admission Council (GMAC) (<https://www.gmac.com/>) who receive application-related data from the Imperial College Business School which contains no directly identifiable information;
- Qualtrics (<https://www.qualtrics.com/uk/>) who issue surveys on our behalf to the College's students and applicants to the College so that we can evaluate our performance and obtain feedback;
- CRM Platforms (Hubspot & Salesforce) to manage data reporting within our marketing and recruitment activities.
- organisations who conduct independent surveys in relation to our courses for their rankings or guides (e.g. the Financial Times (FT) Masters in Finance Ranking). We will share your name, email address and course details so that the organisation can send you the survey to complete. The College's legitimate interests for sharing this data is to promote the reputation of the College's courses. Where practicable, we will email you before we share your details with the organisation to provide you with an opportunity to opt out of participating in the survey;
- professional and industrial bodies wishing to communicate with students about career opportunities and membership of their body. Normally the College will forward you information on behalf of the relevant organisation;
- prospective employers or other organisations who request a reference for you;
- third parties wishing to access a catalogue within the College's Library containing reference to your work;
- research partners, where appropriate / necessary; and
- where you are a student (other than an undergraduate student), with third parties accessing the College's external directory of student e-mail addresses. Once you have a College user ID, you may choose not to show your information in the external directory via this webpage:  
<https://www.imperial.ac.uk/collegedirectory/internal/update/>
- archiving and statistical analysis or research, which may include understanding more about our community to improve engagement, access and diversity (but we will not use your name except to the extent relevant and necessary for the purpose);
- the production and facilitation of surveys relating to College activities or products.
- administration of the College's alumni relations, events and fundraising (see the section below on How is your personal information used after you graduate?);
- analysing and improving the use of our website and any online services we provide;
- the recording of audio/images during lectures as part of the College's teaching provisions and for subsequent use in teaching materials (for more details about how this personal data may be used, see [here](#));
- the recording of audio/images on College grounds for use in our official materials to promote the College and its work, thereby furthering its mission and strategic goals. These materials may include the website, social media channels, the College intranet, in press

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releases and mailings, on event posters, on TV screens on campus or in magazines or prospectuses. We rely on our legitimate interests to do this where it would not be necessary, appropriate or practicable to obtain your specific consent. We will seek specific consent for prominent or impactful uses however;

- analysing our recruitment and marketing activities in order to determine their effectiveness and our future strategies;
- for targeted marketing / advertising of the College and its goods, services, events and resources by post, telephone and electronic means (but without prejudice to your rights under the legislation that regulates the sending of marketing communications by electronic means); and
- organising events (for example events for incoming international students).
- For the purposes of learning analytics we will analyse student personal data in order to improve the student experience for current and future cohorts, enhance the effectiveness of the College's learning, teaching and assessment activities, support the design and delivery of programmes and modules, and to further understand our community in order to improve engagement, access, and diversity and support students better. Where we use personal data for these purposes, we will ensure that any published information is anonymised. Results will be presented as aggregate data, even if the underlying calculations depend upon matching data at individual level.

In addition to those organisations named above, we will also share your personal data with:

- former schools/colleges who will use your results for their statistics or research purposes. The College complies with these requests in order to assist your former school/college in understanding how their students perform at higher education so they can use this knowledge to improve their support to current students;
- our agents and contractors where they require your personal data to perform the services outlined above; and
- direct mail agencies who assist the College in the administration of mailing to students (where student data will only be used for mailings from the College).

It may be the case that some of the uses listed above as falling under a legitimate interest will in fact be necessary for the performance of a public interest task required of the College, although these are more fully covered in the next section.

## Legal obligations and the College's public task

As a provider of higher education, the College is in certain respects a public authority. Your personal data will also be processed by the College for compliance with the College's legal obligations or as part of its public interest task. For example:

- subject to legal and ethical safeguards, for public interest archiving, scientific and historical research or statistical analysis (but we will not use your name or other identifying details except to the extent relevant and necessary);
- when we need to share information with the Higher Education Statistics Agency (HESA) and the Office for Students (OfS). We will also pass on your information to Ipsos Mori who

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undertake the National Student Survey (NSS) on behalf of the OfS. The NSS is aimed at students in their final year of study and participation is voluntary; it is possible to opt out as per the details below.

- For more information on the NSS, including details of how you can opt out, please see <http://www.thestudentsurvey.com/students.php> and <http://www.thestudentsurvey.com/privacy-statement.php>
- For more information about HESA please see: <http://www.imperial.ac.uk/adminservices/legal-services-office/data-protection/hesa/> and <https://www.hesa.ac.uk/about/regulation/data-protection/notices>.
- for the detection and prevention of crime and in order to assist the police and other competent authorities with investigations;
- to comply with tax legislation, immigration and visa requirements, safeguarding duties and subject access requests of others;
- for purposes connected to local authority matters such as electoral registration, council tax or the investigation of benefit fraud; and
- for the purpose of providing census or other information including the assessment of fees to governmental and regulatory authorities.

In this respect, as well as the organisations mentioned above, we may in specific circumstances need to share your personal data with third parties who have made legitimate requests under data protection or freedom of information law or where required as part of a legislative response; the police and other law enforcement agencies; local authorities; the Home Office, British overseas consulates; other international and national governmental and regulatory bodies; HMRC and the College's external auditors; the Office for Students; and the Office of the Independent Adjudicator.

## Where you have consented

Your personal data will also be processed by the College where we have your consent.

Examples where consent would be sought or given may include where specific services have been requested or applied for from the College (for example, where an applicant or student has requested help from the College regarding their visa status) or where the law or some other protocol requires that the College obtains your consent (for certain marketing or fundraising communications, or participation in certain types of research projects). We will also ask for your consent before we submit your details to the Disclosure and Barring Service if we require evidence of whether you have any criminal convictions (see the section on Criminal Convictions below).

Where applicable, consent will always be specific and informed on your part, and the consequences of consenting or not, or of withdrawing consent, will be made clear.

## **Special category and Conviction data**

In addition to the above, College may process types of personal data that the law considers to fall into a special category (such as race, religion, health, sexual life) or criminal records information. As part of the College's statutory and corporate functions, we will process special category data and



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conviction data. This will be in accordance with the College's [Special Category and Criminal Offence Data Policy](#);

- Where you have provided your explicit consent. Examples might include to register you with a professional body where it is a requirement of your studies (e.g. the General Medical Council for medical students) or where it is required in connection with particular programmes of study or prior to certain placements, or with welfare or special needs; or for the assessment and provision of services to disabled students.
- Where such processing is necessary for the establishment, exercise or defence of legal claims (including sharing with the College's insurers and legal advisers) or the prevention or detection of crime (for example, detecting criminal actions through the use of CCTV or reporting allegations to the police);
- Where it is necessary for statistical or research purposes; for example, for researching the diversity of our students and to help widen participation. Please note that use of your personal information in this way will be subject to appropriate safeguards including the pseudonymisation of personal information where this is possible. In all cases we will evaluate the benefits of our use of your personal information in this way against the possible impact on your rights and freedoms and any damage or distress you are likely to be caused as a result of such processing, and will not use this research or analysis in any way that will result in a direct decision or measure affecting you personally. If it is lawfully and ethically appropriate to do so, we may also seek your explicit consent to use your data in this way.
- To comply with the College's legal obligations such as:
  - for research and statistical analysis, for example, sharing personal data with HESA and HEFCE / OfS as set out above; and
  - to assist the police or other law enforcement agencies or local or government authorities where required under national law.
- Where it is in your vital interests to do so and you are incapable of giving consent, for example to inform your specified emergency contact, the NHS or emergency services in the event of your illness or other emergency.
- For the purposes of learning analytics we may analyse special categories data under the legal basis of research, statistics or as is necessary for reasons of substantial public interest such as equality of opportunity.

Where these legal bases do not apply we will always seek your explicit consent in order to process your data.

## Criminal convictions

You will be asked to provide the College with details of criminal convictions (spent or otherwise) where your course, or a project you volunteer for or where you are employed (for example, within the Student Recruitment and Outreach programme) requires a DBS check. This will be necessary because you will be working with children or vulnerable adults, and/or because of fitness to practise or fitness to train requirements in certain regulated professions. We will only use the result of such checks and / or the criminal convictions data provided for the purpose it was collected and it will only be retained for a limited period (see the section on How long is my personal information retained for?).



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## International transfers of data

The College will in limited circumstances disclose personal data to third parties, or allow personal data to be stored or handled, in countries outside the UK.

For example, we will transfer data to:

- partner institutions or organisations where you undertake, or plan to undertake, a placement or exchange programme as part of your studies; and
- IT providers based overseas, including our providers of anti-plagiarism software and external agencies who assist in detecting plagiarism;
- Service providers acting as a data processor for the College.

In these circumstances, your personal data will only be transferred on one of the following bases:

- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. data transfer assessments and standard data protection contract clauses adopted by the European Commission and UK Government respectively);
- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- there exists another situation where the transfer is permitted under applicable law (for example, where we have your explicit consent).

## How is your personal information used after you graduate?

Your personal data will be used by the College's Advancement Division in its work to build an engaged global alumni community. Further details about how the College's Advancement Division may use your information can be viewed on this webpage:

<http://www.imperial.ac.uk/advancement/aboutus/advancement-policies/privacy-policy/>

## Profiling and automated decision making

We use some personal characteristics for profiling purposes to indicate where an applicant fulfils particular contextual admission criteria as defined by the College (from time to time) to help widen participation. However, all decisions about admission will ultimately be made by a dedicated Admissions Tutor.

We may use machine learning algorithms to analyse records of your submitted work. This is to investigate trends in student work, to evaluate a course and to inform future decisions on how to run a course. It will also be used to understand the utility of machine learning as a tool in this context. We will only carry out analysis on pseudonymised data and will not use the data to make any automated decisions about you.

Whilst a student we may also undertake profiling to provide proactive welfare support. To clarify, where events, actions, a change in the relationship between the College and student occur, the

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College will look to offer guidance and support to assist you. To find out more about the support offered, please see [Student Support Zone](#).

You have the right to object to the data processing activity at any time. You can do so by contacting the DPO with the contact details below, your request must provide specific reasons why you are objecting to the processing of your data and this should be based on your particular situation.

## Your rights under the Data Protection Legislation

Under data protection legislation you have the following rights:

- To obtain access to, and copies of, the personal data we hold about you. Further information of how to make such an application can be found at [Imperial College London - Subject Access](#).
- To require that we cease processing your personal data if the processing is causing you damage or distress;
- To require us not to send you marketing communications.
- To request that we erase your personal data;
- To request that we restrict our data processing activities in relation to your personal data;
- To receive from us the personal data we hold about you, which you have provided to us, in a reasonable format specified by you, including for the purpose of transmitting that personal data to another data controller; and
- To require us to correct the personal data we hold about you if it is incorrect.

**Please note** that the above rights are not absolute, and requests may be refused where exceptions apply.

If you have any questions about these rights or how your personal data is used by us, you can contact the Data Protection Officer using the following details:

- Post – Data Protection Officer Address - Level 4 Faculty Building, Imperial College London, South Kensington, London, SW7 2AZ
- Email – [dpo@imperial.ac.uk](mailto:dpo@imperial.ac.uk)
- Telephone – 020 7594 3502

If you are not satisfied with how your personal data is used by the College you can make a complaint to the Information Commissioner ([www.ico.org.uk](http://www.ico.org.uk)).

## How long is my personal information retained for?

After you leave the College, some student data (including some personal data) will be retained as a permanent archival record for research and legal purposes. Your data is otherwise retained in accordance with the College's Retention Schedule available at:

[Retention Schedule - Imperial College London](#)

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We will only retain your personal data for as long as necessary to fulfil the purposes we collect it for. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data (such as operational, contractual, legal, accounting or reporting requirements) and whether we can achieve those purposes through other means, and the applicable legal requirements.

**Please note:** if you submit an application for admission to the College, successfully or otherwise, as a matter of course we will permanently retain a copy of your application. This is in order to research and analyse trends and identify possible improvements in the College's admissions process and diversity, as well as its outputs including student results and careers. This is necessary to ensure appropriate monitoring of the effectiveness of our admissions services, and core educational functions, as a UK Higher Education provider.

Any resulting outcomes or findings that we publish will be statistical and anonymised and will not identify individuals. If you do object to our retaining your admissions information for these purposes, we will consider such objections alongside available ways to safeguard and minimise personal data that will not prejudice the College's core research functions. We will also retain applications to assist our ability to detect fraud.

If you have any further questions please contact [dpo@imperial.ac.uk](mailto:dpo@imperial.ac.uk).

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