

# Creating Privacy Notices

## Guidance for staff

### What is a Privacy Notice?

A privacy notice is a legal notice providing information to customers, regulators and other stakeholders about what the organization does with personal information. We are required to provide one when collecting personal data<sup>1</sup> and when we have obtained personal data from a third party, unless it would be disproportionate to let people know<sup>2</sup>.

The Information Commissioner's Office provides [privacy notice guidance](#).

If you are collecting research data, you should follow the [informed consent](#) guidance template as this is tailored for research.

### Why should we provide a Privacy Notice?

1. It is the law;
  - a. Individuals need to be informed about data privacy, at the point of data collection or when requested based on Articles 13 and 14 of the General Data Protection Regulation (GDPR).
  - b. It can be used to fulfil one of the key requirements under the GDPR regulation; Article 5(1a) personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.
2. It is organisational best practice.
3. It builds trust as students, staff and other individuals will know what we are doing with their information.
4. It informs people from the onset how the organisation will use and share their personal data.
5. It allows individuals to know their rights and any exceptions to their rights in certain circumstances.

### The basic template for Privacy Notices

<sup>1</sup> Article 13 of the General Data Protection Regulation

<sup>2</sup> Article 14 of the General Data Protection Regulation

It is suggested you use the following template as the basis for a privacy notice. There are exceptions to this. The [Informed Consent guidance](#) should be used for collection of research data. There is also a separate guidance on privacy notices for marketing purposes.

However the basic template that should be used is:

[The School/department/centre/institute/division] will use [the data being collected e.g. name and email address] to [purpose for collection].

[If covered by contract/legal/vital interests/public task] We require this data for [contractual/legal/to cover your interests/because it is in the public interest for us to process it].

[If you need consent, include] Please tick to show you consent for the School to send you this information.

[If you are using legitimate interests] We need this data in order to [let you know about our services/keep you up to date with what we are doing/etc] and will only ever process it in line with your rights.

You can ask the School to stop sending you this information by contacting [relevant email address].

The data does not leave the UK/EU/is stored in a country with an adequacy decision/a US company covered by the EU-US Privacy Shield [delete as appropriate].

Further information on how the School manages personal data can be found on the School's website.

## Further information on the School's website

Privacy notices are meant to be concise. However, they also need to include (potentially) 12 pieces of information, some of which will be the same on each privacy notice. As such, we have identified the following as information that would need to be included each time. You can link to this guidance note for this information.

2AE. 'London School of Economics and Political Sciences is based in Houghton Street, London WC2A

The Data Protection Officer is **Rachael Maguire**, who can be contacted via [gldp.info.rights@lse.ac.uk](mailto:gldp.info.rights@lse.ac.uk)

The legal basis for processing is recorded in the School's Information Asset Register, which can be obtained from the Data Protection Officer. In general however, most student and staff data will be processed under contract, most alumni data under legitimate interests and most marketing data under consent.

The retention of personal data is governed by the [School's retention schedule](#) and [academic department retention schedule](#). Please contact the Data Protection Officer for details of retention of particular personal data.

You have the right to request that data held about you is corrected, deleted where obtained by consent and to have it provided in machine readable format for data portability purposes where obtained via consent or contract. You can object to processing and marketing by following unsubscribe notices or by contacting the Data Protection Officer.

If you are ever unhappy with the way the School has processed your personal data, you can contact the [Information Commissioner's Office](#).

## Appendix 1: Article 13 and 14 requirements

The areas coloured blue are in the web text and should be linked to by every privacy notice. The text that remains in black should be included in the privacy notice where applicable.

1. the identity and the contact details of the controller and, where applicable, of the controller's representative;
2. the contact details of the data protection officer, where applicable;
3. the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
4. where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller or by a third party;
5. the recipients or categories of recipients of the personal data, if any;
6. where applicable, the fact that the controller intends to transfer personal data to a third country or international organisation and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.
7. the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
8. the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
9. where the processing is based on point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
10. the right to lodge a complaint with a supervisory authority;
11. whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;
12. the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Article 14 also requires that data subjects are told the source of the data where this has been received from a third party.

## Review schedule

Review interval	Next review due by	Next review start
3 years	31/07/2027	1/07/2027

## Version history

Version	Date	Approved by	Notes
1.0	08/07/2018	GDPRWG	
1.1	01/07/2024	IGMB	Minor updates

## Links

Reference	Link

## Contacts

Position	Name	Email	Notes
Data Protection Officer	Rachael Maguire	<a href="mailto:r.e.maguire@lse.ac.uk">r.e.maguire@lse.ac.uk</a>	

## Communications and Training

Will this document be publicised through Internal Communications?	<b>Yes</b>
Will training needs arise from this policy	<b>No</b>
If Yes, please give details	