



# Operational Creating Privacy Notices for Marketing Guidance for staff

When collecting data from people, we need to tell them what it will be used for and who it will be shared with. This is called a privacy notice. This guidance provides examples you can use depending on the data you are collecting and for what purpose when marketing to people.

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

## What are marketing emails/forms?

Marketing emails are emails that tell people both within or outside the School about:

- A new course that the School is offering
- What the School, or a particular part of it is researching – usually these will be newsletters of some type
- Events, including lectures, seminars, talks etc. hosted by the School or with connected third parties
- Requests for funding, usually to those who already have a connection to the School e.g. alumni
- Etc.

In other words, marketing emails cover what we offer to potential students, news about what we are doing and requests for support. You may also request information for marketing via web forms, which will also require a privacy notice.

## What do we need to include in a privacy notice for marketing emails/forms

You need to be clear about what you are collecting and why. This will be fairly obvious with a simple invitation e.g. 'we need your email address in order to send you the invitation' but if you intend to use the information for another purpose, you need to make that clear e.g. 'having signed up to our newsletter, we would also like to contact you about events we are running, tick here if you agree'.

There is also a certain amount of text the General Data Protection Regulation requires us to provide for each privacy notice. We are also required to keep them concise. The requirements are listed in Appendix 1, Article 13 and 14 requirements. Some of the requirements are the same for every privacy notice. Appendix 2 has the text which you can copy and paste. While specific templates are offered below for course, newsletters etc., you may have a more general need for a privacy notice so a basic template is

in Appendix 3.

## Choose your privacy notice

Based on what you are doing, choose one of the samples below and fill it out based on your particular data collection. The areas in square brackets should be edited for your particular data collection.

**a) For courses offered only by the School:**

London School of Economics and Political Science (the School) will use [the data being collected e.g. name and email address] to send you information about the course(s) you have indicated you are interested in. Please tick:

To show you consent for the School to send you this information:

If you would like information on other courses the School thinks you might be interested in

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

This information is not shared with anyone outside the School and does not leave the UK/EU [delete as appropriate].

Further information on how the School manages personal data can be found here:

<https://info.lse.ac.uk/staff/divisions/Secretarys-Division/Assets/Documents/Information-Records-Management/Privacy-Notices/Student-Privacy-Notice-v1.7.pdf>

**b) For joint courses where the School collects the data**

London School of Economics and Political Science (the School) will use [the data being collected e.g. name and email address] to send you information about the course(s) you have indicated you are interested in. Please tick:

To show you consent for the School to send you this information:

If you would like information on other courses the School thinks you might be interested in:

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

This information is shared with the School's partner(s) offering this course, [name of organisations].

[For partners within the EU] The data does not leave the UK/EU [delete as appropriate]. [For partners outside the EU] [Describe which data exactly] will be transferred to our partner in order for them to provide information to you. Please tick here to show you consent to this transfer. If you do not tick, you will only be contacted by the School.

Further information on how the School manages personal data can be found here:

<https://info.lse.ac.uk/staff/divisions/Secretarys-Division/Assets/Documents/Information-Records-Management/Privacy-Notices/Student-Privacy-Notice-v1.7.pdf>

**c) For events**

London School of Economics and Political Science (the School) will use [the data being collected e.g. name and email address] to send you information about this event. Please tick to show you consent for the School to send you this information:

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

This information is shared with the School's partner(s) involved in this event, which are [name of organisations].

[For partners within the EU] The data does not leave the UK/EU [delete as appropriate]. [For partners outside the EU] [Describe which data exactly] will be transferred to our partner in order for them to provide information to you. Please tick here to show you consent to this transfer. If you do not tick, you will only be contacted by the School.

Further information on how the School manages personal data can be found here:

<https://info.lse.ac.uk/staff/divisions/Secretarys-Division/Assets/Documents/Information-Records-Management/Privacy-Notice-for-Visitors.pdf>

**d) For newsletters**

[Your department/centre/institute/division] will use [the data being collected e.g. name and email address] to send you our newsletter. Please tick to show you consent for the School to send you this information:

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 here:

<http://www.lse.ac.uk/lse-information/privacy-policy>

**e) For fundraising**

As it is possible you will be using this alongside some of the above, you could add a sentence such as:

'The School would also like to contact you for fundraising activities. Please tick if you are happy to be contacted for this purpose by:

email

telephone

text messaging

post

For any other purpose, a basic template is available in Appendix 3.

## Appendix 1: Article 13 and 14 requirements

The list of information we are required to provide is below.

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.

## Appendix 2 Website text for all privacy notices to copy

London School of Economics and Political Sciences is based in Houghton Street, London WC2A 2AE. 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 3 Basic privacy notice template

This is a generic template that contains all the requirements of Article 13.

[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 here:

<http://www.lse.ac.uk/lse-information/privacy-policy>

## Review schedule

Review interval	Next review due by	Next review start
3 years	31/07/2021	1/07/2024

## Version history

Version	Date	Approved by	Notes
1.0	15/06/2018	GDPRWG	
1.1	12/7/2021	IGMB	Updated areas on text to copy and added privacy notice links

## 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	