

## HDR UK and the Alan Turing Institute PhD Applicant Privacy Notice

**Last updated:** 23 September 2020

### Controllers and purpose of this privacy notice

Health Data Research UK ("**HDR UK**") (a private limited company registered in the UK, company registration no: 10887014) and The Alan Turing Institute (registered charity (registered charity no: 1162533) and company limited by guarantee with registration number 09512457, based at the British Library, 96 Euston Road, London NW1 2DB) are both strongly committed to protecting the privacy of applicants applying for our programmes.

This transparency notice applies to:

- applicants for a studentship on the HDR UK Wellcome Turing PhD Programme in Health Data Science (the "**PhD Programme**"); and
- referees providing references for such applicants.

HDR UK and The Alan Turing Institute work in partnership in the way that we handle your personal information as part of the application process for a studentship on the PhD Programme. For the purposes of recruitment for such studentships, HDR UK and The Alan Turing Institute are considered "joint controllers". This means that we may jointly determine the purposes and means of processing your personal data. If you would like further details of this joint controller arrangement, please contact us as set out in the 'Contact us' section below.

In this notice, a reference to "**we**", "**our**" or "**us**" is a reference to HDR UK and The Alan Turing Institute.

### How and why we use your personal information

If you apply for the PhD Programme, we collect the following information from you via Flexigrant and from your referees (as applicable):

- **personal identification and communication information:** including your name, email address, phone number, current home address and immigration status;
- **application-related information;** including responses to application questions, fee status, studentship preferences and reference contact information and references; and
- **academic and employment experience:** including previous qualifications and skills, curriculum vitae and employment history.

We use this personal information to review your application and interview you.

We also will request the following optional personal information which you have the choice to share:

- monitoring information (including in relation to age, gender, gender identity, ethnicity, disability, sexual orientation, caring responsibilities, religion or belief, socio-economic background); and
- information regarding reasonable adjustments relating to health and disabilities.

We will not use this information to review your application but will contact you to discuss reasonable adjustments should you disclose a disability. We will anonymise your monitoring information and use this information to monitor our applications against our equality, diversity and inclusion aims.

If you provide a reference for an applicant, we will collect the following information from you via Flexigrant:

- Name;
- Contact information (email address, phone number, current address);
- Current position/occupation; and
- Reference details.

This information will all be collected via Flexigrant and will be securely stored in The Alan Turing Institute's Sharepoint and/or Flexigrant Application Systems and HDR UK's Box system. The servers for Sharepoint, Box and Flexigrant are all based in the UK.

### **Lawful basis for using your personal information**

We collect, use and store your personal data for the reasons set out below:

- **As required to take steps which are necessary for us to enter into a contract with you for a studentship on the PhD Programme:**
  - to make informed decisions on recruitment and assess your suitability for a studentship on the PhD Programme; and
  - to reimburse you for any agreed expenses incurred in the application process.
- **Where necessary to comply with a legal obligation:**
  - as required to comply with applicable laws and protect our legal rights including, but not limited to, in connection with legal claims, (including disclosure of information in connection with legal process or litigation). If you are successful, this will include verifying whether you have the right to accept a place on the PhD Programme and checking whether the information you have provided in the application is correct.
- **Where necessary for our legitimate interests, as listed below, and where our interests are not overridden by your data protection rights:**
  - to make informed decisions on recruitment, assess your suitability for a place on the PhD Programme and verify the details you have supplied;
  - to communicate with you about the application process and answer your queries;
  - to improve our recruitment processes and activities; and
  - to protect our legitimate business interests and legal rights, including, use in connection with legal claims, compliance, regulatory, auditing, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting requirements.
- **Where you have given consent.** For example, we ask for your permission to conduct equal opportunities monitoring. Where we ask for consent, you are free to withhold or revoke it.

We have carried out a balancing test in order to determine what is in our legitimate interests and you can request information about this balancing test by contacting us using the details set out in the 'Contact us' section below.

Where we require you to provide personal data to comply with legal or contractual obligations, then provision of such data is mandatory: if such data is not provided, then we will not be able to complete your application process, or to meet obligations placed on us. In all other cases, provision of requested personal data is optional. Where you do not provide the relevant data for in these circumstances, the consequences will be explained to you at the time.

## **Information sharing – how we share your personal data**

We will not sell or rent your information or share it with other companies for marketing purposes.

In the course of the application process, your personal information may be shared with the following organisations:

- Wellcome Trust and other relevant funders of studentships on the PhD Programme;
- our PhD Programme partner universities (University of Birmingham, University of Cambridge, University of Edinburgh, University of Manchester, University of Oxford, Queen's University Belfast, University College London) for the purposes of assessing applications for the studentship; and
- other partner organisations of the PhD Programme providing contributions to the PhD Programme.

We also share your personal information with third-party service providers who provide services to us. The following activities are carried out by third-party service providers on our behalf: archiving and records management; IT support and maintenance. Your personal data may also be shared with professional advisors like lawyers and accountants.

Personal data will be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.

In the event HDR UK or The Alan Turing Institute is sold or integrated with another business, your details may be disclosed to relevant advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

## **How long will we keep your personal information?**

If you are unsuccessful: We will keep your personal information in our Sharepoint or Flexigrant application system for up to 6 months to review our recruitment decision after your application or interview if you are unsuccessful. After this period, we will take steps to delete your personal data or hold it in a form that no longer identifies you.

If you are successful: For successful candidates, we will retain your personal data for the purposes of the recruitment process and, once this process is finished, for an appropriate period so as to be able to deal with any legal claims linked to the application process and for any periods we are required to keep your personal data under applicable law. After this period, we will take steps to delete your personal data or hold it in a form that no longer identifies you. If you are enrolled as a student on the PhD Programme, your personal data will become a part of your student file and will be used later for the management of your studentship and participation in the PhD Programme.

## **Your choices and rights**

You have the right to be **informed** of how we collect and use your information, the right to access a **copy** of your personal data, to **correct**, **delete** or **restrict** processing of your personal data, **and to obtain the personal data you provide in a structured, machine readable format**. In addition, you can **object** to the processing of your personal data in some circumstances. Where we have asked for your consent, you may **withdraw consent** at any time. If you ask to withdraw your consent to the processing of your personal data, this will not affect any processing which has already taken place at that time.

These **rights may be limited**, for example if fulfilling your request would unfairly reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep. We will inform you of relevant exemptions we rely upon when responding to any request you make.

If you would like to exercise any of your rights in relation to your personal information, or to get a copy of our legitimate interest balancing test for any processing activity, please contact [phd@hdruk.ac.uk](mailto:phd@hdruk.ac.uk)

If you have any unresolved concerns, you also have the right to lodge a **complaint** with data protection authorities in the country where you live or work, or where you consider a breach of data protection law has occurred (in most cases this will be the Information Commissioner's Office (ICO)).

Read more about your rights [here](#).

### **Updates to this privacy notice**

This privacy notice may be updated periodically. We will update the date at the top of this privacy notice accordingly and encourage you to check for changes to this privacy notice, which will be available on this [website](#). On some occasions, we may also actively advise you of specific data handling activities or significant changes to this privacy notice, as required by applicable law.

### **Contact us**

For further information or to provide feedback on our transparency notice or to exercise any of your rights with respect to your personal data, please contact us at [phd@hdruk.ac.uk](mailto:phd@hdruk.ac.uk)