

## PRIVACY NOTICE for HUMAN RESOURCES

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## PRIVACY NOTICE FOR HUMAN RESOURCES General Data Protection Regulation (GDPR) 2016

### Purpose

This Privacy Notice outlines what personal data Human Resources hold about you, how it is collected, processed and who it is shared with. It also explains your rights as a data subject. It applies to all potential employees, existing employees and former employees of Glasgow School of Art (GSA).

### Preliminary Information

If you have any questions relating to our use of your personal data, these should be referred in the first instance to our HR Office by emailing [hr@gsa.ac.uk](mailto:hr@gsa.ac.uk).

Tom McDonnell is GSA's Data Protection Officer – [dataprotection@gsa.ac.uk](mailto:dataprotection@gsa.ac.uk)

You have the right to lodge a formal complaint against GSA regarding data protection issues with the Information Commissioner's Office (<https://ico.org.uk/concerns/>).

### The Data Protection Principles

GSA will comply with data protection law. This says that the personal information GSA holds about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that GSA has clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes GSA has told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes GSA has told you about.
6. Kept securely.

### What is Personal Data?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

## 1. JOB APPLICANTS

This section is applicable to all potential employees of GSA. It does not form part of any contract of employment or other contract to provide services. GSA may update this notice at any time.

### **What personal data does GSA hold about you?**

In order for Human Resources to respond to your enquiries and to process your application to work with us, GSA needs to collect, hold and use your personal data in which you wish to share with us in connection with your job application.

If you make an enquiry about working at GSA, the personal data collected will be used to respond to your query.

In connection with your application for work, GSA will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your CV and covering letter
- The information you have provided on GSA's application form, including name, title, address, telephone number, personal email address, date of birth, gender, nationality, employment history (including salary details), qualifications and memberships of professional bodies, employment references, portfolio images,
- Any information you provide to GSA during an interview
- Any information provided as part of psychometric testing, group or individual presentations.

GSA may also collect, store and use the following Special Categories of more sensitive data:

- Information about your race or ethnic origin, religious or philosophical beliefs, gender identity, sexual orientation
- Information about your health, including any medical condition, health and sickness records (including information on any disabilities)
- Information about criminal convictions and offences

## **Legal Basis for holding your personal data**

For the personal data GSA hold and process about you, GSA by law, has to provide you with the legal basis under which GSA are processing it. Most commonly, GSA will use your personal information in the following circumstances:

### **1. Legitimate Interest**

It is in GSA's legitimate interests to decide whether to appoint you to the role, since it would be beneficial to GSA to appoint someone to that role.

### **2. Performance of Contract**

If you submit an application to work at GSA, your personal data is being processed in order to assess whether you meet the role criteria and whether an offer of employment should be made, where you would enter into a contract with GSA.

### **3. Legal Obligation**

GSA will process your personal data where it needs to do so to comply with a legal obligation (e.g. reporting to HMRC).

### **4. Consent**

There may be cases where GSA requires your consent to process your personal data if it cannot be processed under any other legal basis.

Where GSA requires your consent to process your personal data, you will be asked to complete and return a Data Subject Consent form.

If you give your consent for GSA to process your personal data, you can withdraw this consent in whole or part at any time. If you wish to withdraw your consent you will be asked to complete and return a Data Subject Consent Withdrawal form. Human Resources will also explain the consequences of withdrawing your consent in any particular case.

## **Primary purposes of processing personal data**

GSA will use the personal information it collects about you to:

- Assess your skills, qualifications and suitability for the work or role;
- Carry out background and reference checks, where applicable;
- Communicate with you about the recruitment process;
- Keep records relating to the hiring processes;
- Comply with legal or regulatory requirements;
- Complete application statistics for internal use and reporting to statutory and regulatory bodies or sector bodies e.g. HESA;
- Any other legitimate uses which are consistent with your application.

Having received your application form, GSA will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, GSA will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to

decide whether to offer you the role. If we decide to offer you the role, we will then [take up references **AND/OR** carry out a criminal record check before confirming your appointment].

If you fail to provide information when requested, which is necessary for GSA to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for the role in question and you fail to provide us with relevant details, we will not be able to take your application further.

### **How we use sensitive personal information**

GSA will use your particularly sensitive personal information in the following ways:

- GSA will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made [during a test or interview OR [OTHER]].
- GSA will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

### **Information about Criminal Convictions**

GSA envisages that it will process information about criminal convictions.

GSA will collect information about your criminal convictions history if it would like to offer you a role (conditional on checks and any other conditions, such as references, being satisfactory). GSA is required to carry out a criminal records check in order to satisfy itself that there is nothing in your criminal convictions history which makes you unsuitable for the role.

### **PVG Scheme membership**

There are roles at GSA that are currently considered to be regulated work. A list of roles that are eligible for PVG Scheme membership, are detailed in the PVG Scheme Policy.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

### **Data Sharing**

Relevant personal data will be shared internally with:

- The recruiting manager in the department to which you have applied to work, in order for them to assess your application and invite you to interview, if applicable.
- Other senior members of GSA staff who form the recruitment panel, in order for them to assess your application and make recommendations to the recruiting manager about inviting you to interview, if applicable.
- The Finance Office to allow for payment of any expenses incurred by you during the recruitment process.

GSA will only share your personal information with third parties for the purposes of processing your application. Relevant personal data will be shared externally with:

- Subject specialists invited by GSA to participate in the recruitment panel, in order for them to assess your application and make recommendations to the recruiting manager about inviting you to interview, if applicable.

GSA strives to ensure that all personal data remains current and accurate. If you become aware of any incorrect information held by GSA, you should request that this is rectified by contacting Human Resources.

### **Sharing of personal data with other organisations**

In order to fulfil our statutory or regulatory obligations, any personal data GSA holds about you may be provided, without explicit consent, to organisations including but not limited to the Health and Safety Executive (HSE), the Higher Education Statistics Agency (HESA) and the United Kingdom Visa and Immigration authority (UKVI).

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Sources of data**

GSA receives personal information in several ways but primarily obtained direct from you, the data subject, information you have given to other members of GSA staff or from employment agencies. For information on how employment agencies hold and use your personal information, please refer to their own privacy notice.

GSA also collects personal information from your named referees, from whom it receives the following categories of data:

- Full name; title
- Job title
- Salary
- Dates of employment
- Location of employment or workplace
- HESA number

### **Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based on automated decision-making.

### **Data retention**

GSA will retain your personal information for a period of 12 months after it has communicated to you its decision about whether to appoint you to role. GSA retains your personal information for that period so that it can show, in the event of a legal claim, that it has not discriminated against candidates on prohibited grounds and that it has conducted the recruitment exercise in a fair and transparent way. After this period, your personal information will be securely destroyed in accordance with applicable laws and regulations.

If GSA wishes to retain your personal information on file, on the basis that a further opportunity may arise in future and it may wish to consider you for that, GSA will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## **2. EXISTING AND FORMER EMPLOYEES**

This section is applicable to all existing employees, workers, contractors and former employees of Glasgow School of Art (GSA). It does not form part of any contract of employment or other contract to provide services. GSA may update this notice at any time.

### **What personal data does GSA hold about you?**

All staff confirm their personal data when commencing employment with GSA. This may include what is known as Special Category data, otherwise referred to as sensitive personal information.

In addition, during the course of your employment, your staff record will be updated to include information relevant to your employment at GSA.

Personal data we will collect, store and use will include the following:

- Full Name; title; date of birth; postal and email addresses; phone numbers
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start date
- Location of employment or workplace
- National Insurance number
- Nationality
- Country of Birth
- Qualifications and professional memberships
- Staff ID photograph
- driving licence and insurance
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Employment references
- Compensation history
- Performance, disciplinary and grievance information
- Emergency contacts/next of kin details
- Photographs
- CCTV footage and other information obtained through electronic means such as swipe card records
- Information about your use of GSA's information and communications systems
- Passport and visa information
- Job evaluation applications

Special Category data which we may collect, store and use include the following:

- Information about your race or ethnic origin
- Information about your health, including any medical condition, health and sickness records (including any disabilities)
- Equality information such as religious or philosophical beliefs, gender identity, sexual orientation.
- Information about criminal convictions and offences

### **Legal Basis for holding your personal data**

For the personal data Human Resources hold and process about you GSA, by law, has to provide you with the legal basis under which it is being processed. Most commonly, GSA will use your personal information in the following circumstances:

#### **1. Performance of Contract**

Where GSA needs to perform the contract it has entered into with you.

When you are employed, or when you change roles, GSA will ask you to accept Terms and Conditions of Employment, at which point you will be entering into, or renewing your contract with GSA.

#### **2. Legal Obligation**

GSA will process your personal data where it needs to do so to comply with a legal obligation (e.g. reporting to HMRC).

#### **3. Consent**

There may be cases where GSA requires your consent to process your personal data if it cannot be processed under any other legal basis.

If Human Resources need your consent for a specific purpose, such as a potential reference request, you will be asked to complete and return Data Subject Consent form before your data will be shared with a third party.

If you give your consent for Human Resources to process your personal data, you can withdraw this consent in whole or part at any time. If you wish to withdraw your consent you will be asked to complete and return a Data Subject Consent Withdrawal form. Human Resources will also explain the consequences of withdrawing your consent in any particular case.

#### **4. Legitimate Interest**

Where it is necessary for GSA's legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

GSA may also use your personal information in the following situations, which are likely to be rare:

- I. Where GSA needs to protect your interests (or someone else's interests).

II. Where it is needed in the public interest or for official purposes.

### **Primary purposes of processing personal data**

GSA needs all the categories of information in the list above (see paragraph 2) primarily to allow it to perform its contract with you [\*] and to enable it to comply with legal obligations [\*\*]. In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties [\*\*\*], provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below. We have indicated by asterisks the purpose or purposes for which we are processing or will process your personal information.

- Making a decision about your recruitment or appointment.\*\*\*
- Determining the terms on which you work for us.\*
- Checking you are legally entitled to work in the UK.\*\*
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.\*\*
- Providing the following benefits to you: [LIST].\*
- Liaising with your pension provider.\*
- Administering the contract we have entered into with you.\*
- Business management and planning, including accounting and auditing.\*\*\*
- Conducting performance reviews, managing performance and determining performance requirements.\*
- Making decisions about salary reviews and compensation.\*
- Assessing qualifications for a particular job or task, including making decisions about promotions.\*
- Making decisions about job evaluation\*
- Gathering evidence for possible grievance or disciplinary hearings.\*
- Making decisions about your continued employment or engagement.\*
- Making arrangements for the termination of our working relationship.\*\*\*
- Education, training and development requirements.\*

- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.\*\*\*
- Ascertaining your fitness to work.\*
- Managing sickness absence.\*
- Complying with health and safety obligations.\*\*
- To prevent fraud.\*\*\*
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.\*
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.\*\*\*
- To conduct data analytics studies to review and better understand employee retention and attrition rates.\*\*\*
- Equal opportunities monitoring.\*\*\*

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Your personal data will be used by Human Resources to keep your staff record accurate. Human Resources will regularly update personal data; update information related to your employment, including absence, hours of work, salary, role; record information related to grievances or disciplinary matters; record information related to health and wellbeing; compile staff statistics for both internal use and reporting to statutory and regulatory bodies.

If you fail to provide certain information when requested, GSA may not be able to perform the contract it has entered into with you (such as paying you or providing a benefit), or it may be prevented from complying with its legal obligations (such as ensuring the health and safety of its workers).

### **Change of Purpose**

GSA will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Sensitive Personal Information**

"Special categories" of particularly sensitive personal information require higher levels of protection. GSA needs to have further justification for collecting, storing and using this type of personal information. GSA has in place an appropriate policy document and safeguards which it is required by law to maintain when processing such data.

GSA may process special categories of personal information in the following circumstances:

- a) In limited circumstances, with your explicit written consent.
- b) Where it needs to carry out its legal obligations or exercise rights in connection with employment.
- c) Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme.

Less commonly, GSA may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. GSA may also process such information about current or former employees, contractors or workers in the course of legitimate business activities with the appropriate safeguards.

GSA will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

GSA does not need your consent if it uses special categories of your personal information in accordance with its written policy to carry out its legal obligations or exercise specific rights in the field of employment law. In limited circumstances, GSA may approach you for your written consent to allow it to process certain particularly sensitive data. If it does so, you will be provided with full details of the information that GSA would like and the reason it is required, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with GSA that you agree to any request for consent from GSA.

### **Information about Criminal Convictions**

GSA may only use information relating to criminal convictions where the law allows it to do so. This will usually be where such processing is necessary to carry out its obligations and provided it is carried out in line with GSA's data protection policy.

Less commonly, GSA may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

GSA may also process such information about current or former employees, contractors or workers in the course of legitimate business activities with the appropriate safeguards. GSA envisages that it will hold information about criminal convictions.

GSA will only collect information about criminal convictions if it is appropriate given the nature of the role and where it is legally able to do so. Where appropriate, GSA will collect information about criminal convictions as part of the recruitment process or it may be notified of such information directly by you in the course of your employment. GSA will use information about criminal convictions and offences in the following ways:

- to decide if it can offer you employment or engagement; or
- to decide if you can remain in employment or engagement.

### **Internal Data Sharing**

Your personal data will be shared internally with:

- Your line manager, in relation to routine aspects of your employment. Human Resources will not share sensitive information with your line manager without your consent.
- IT department, in order to give you access to the GSA network and your staff email account.
- Learning Resources so you can access the library facilities and in order to give you relevant access to Canvas (if applicable).
- Finance department, in relation to payment of expenses.
- The Estates department in order to activate your staff ID card and allow you access to campus buildings.
- The Research department, so that they can provide you with relevant access to RADAR (if applicable).
- The Marketing department to enable them to send you newsletters and information on events etc.

### **Sharing of personal data with other organisations**

In order to fulfil our statutory or regulatory obligations, or where it is necessary to administer the working relationship with you, or where GSA has another legitimate interest in doing so, any personal data Human Resources hold about you may be provided, without explicit consent, to third party organisations and service providers including but not limited to:

- Her Majesty's Revenue and Customs (HMRC)
  - GSA is obliged to provide personal data to HMRC for the purposes of registering and calculating tax and National Insurance payments (employer and employee contributions), as well as any statutory payments applicable.
- Pensions Agencies
  - GSA has an obligation to ensure that you have access to a pension scheme through the course of your employment, and must provide personal data to the relevant pensions agency for the purposes of processing your pension provision.
  - Depending on which pensions agency you are enrolled with, your data will either be shared with Strathclyde Pension Fund (SPF), Scottish Public Pensions Agency (SPPA) or NEST.
- Health and Safety Executive (HSE)
- UK Visas and Immigration (UKVI)
  - GSA is obliged to use personal data to demonstrate to UKVI an employee's right to work in the UK, if and when required
  - In cases where an employee requires a visa to work in the UK, GSA is required to provide personal data to allow assessment of the visa application by the Home Office.
- Higher Education Statistics Agency (HESA)
  - GSA is obliged to provide data, including special category data, to HESA. The data is provided on the understanding that any subsequent publication of data leaves the data subjects totally anonymous. Full details on how HESA use staff data can be found on their website at <https://www.hesa.ac.uk/about/regulation/data-protection/notices>
- UK agencies with duties relating to the prevention and detection of crime, collection of a tax or paying of benefits, or duty or safeguarding national security
  - For example, Job Centre Plus, Office for National Statistics, the Police, Social Services or the Foreign and Commonwealth Office.

In order to fulfil its contractual obligations, GSA may share your personal data with other organisations, including but not limited to:

- Occupational Health
  - If you are attending Occupational Health, GSA will share personal data relevant to the advice sought. This data will include, but is not limited to, absence details, work pattern, job details and any disclosed health issues.
- Counselling services
  - If you are referred to one of GSA's counselling providers it may be necessary to provide your name and contact telephone number to the service provider to allow contact to be made.
- External consultants such as mediators, or other parties engaged to carry out investigations.

All GSA's third-party service providers are required to take appropriate security measures to protect your personal information in line with GSA's own policies. GSA does not allow third-party service providers to use your personal data for their own purposes. They are only permitted to process your personal data for specified purposes and in accordance with GSA's instructions.

### **Sources of data**

Human Resources receive personal data in several ways but it is primarily obtained through the application and recruitment process, either directly from you or from an employment agency or background check provider. It can also be provided by other members of GSA staff; or external partners where GSA have relevant agreements in place.

GSA may also receive data from other organisations who have obtained your consent to share such data. This will include, but is not limited to:

- Cycle to Work
  - If you have opted to take part in the Cycle to Work scheme via salary sacrifice, your personal data may be sent to GSA to ensure processing of payment for your bicycle voucher.
- Co-operative Childcare Vouchers
  - If you have opted to take part in the Childcare Voucher scheme via salary sacrifice, your personal data may be sent to GSA to ensure processing of payment for your childcare vouchers.
- Trade Union Organisations
  - If you have opted to pay Trade Union membership contributions through DOCAS (Deduction of Contributions at Source), your personal data may be sent to GSA to ensure processing of payment to the relevant Trade Union.
- Occupational Health
  - If you have attended occupational health GSA will receive a report containing job-specific recommendations related to your health condition.
- Former Employers
- Credit Reference Agencies or other background check agencies
- Disclosure Scotland or the Disclosure and Barring Service

GSA will collect additional personal information in the course of job-related activities throughout the period of your employment.

### **Automated Decision Making**

GSA does not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

### **Data Retention**

GSA will only retain your personal information for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in GSA's Staff Records Retention Schedule. To determine the appropriate retention period for personal data, GSA considers 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 it processes your personal data and whether GSA can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances GSA may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

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### **3. GENERAL**

#### **What you are responsible for?**

When you are employed you are asked to check that the data Human Resources holds about you is current and accurate. It is your responsibility to ensure you inform us of subsequent changes, such as a change of name or address. Some of your personal data can be updated via Employee Self-Service. Otherwise, you can do this by contacting Human Resources either by phone, email or in person.

When you are employed, you are asked to provide details of emergency contacts that can be contacted if an emergency situation arose. If it is necessary to speak with your emergency contact(s), the only details disclosed will relate to immediate health or safety concerns. When you provide emergency contact details, it is your responsibility to inform them that they are your nominated contact for this purpose and you must inform Human Resources of any change to this contact. You can change your emergency contact details via Employee Self-Service.

### **Transfers outside the EEA**

In some instances, Human Resources may transfer your personal data to third parties located in other countries, including some outside of the European Economic Area. All instances of overseas transfers of personal data are subject to appropriate technical safeguards and contractual provisions incorporating appropriate assurances to ensure the security of the data and full compliance with legislative and regulatory requirements.

### **Data Security**

GSA has put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, GSA limits access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

GSA has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information GSA holds about you and to check that it is being processed lawfully.
- **Request correction** of the personal information that GSA holds about you. This enables you to have any incomplete or inaccurate information GSA holds about you corrected.
- **Request erasure** of your personal information. This enables you to ask GSA to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask GSA to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where GSA is relying on a legitimate interest (or those of a third party) and there is something about your

particular situation which makes you want to object to processing on this ground. You also have the right to object where GSA is processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask GSA to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that GSA transfers a copy of your personal information to another party, please contact Data Protection Officer in writing to [dataprotection@gsa.ac.uk](mailto:dataprotection@gsa.ac.uk)

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, GSA may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, GSA may refuse to comply with the request in such circumstances.

GSA may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

#### **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [POSITION]. Once GSA has received notification that you have withdrawn your consent, it will no longer process your information for the purpose or purposes you originally agreed to, unless it has another legitimate basis for doing so in law.

To exercise these rights please contact [dataprotection@gsa.ac.uk](mailto:dataprotection@gsa.ac.uk) in the first instance.

#### **Contact details**

GSA has appointed a data protection officer (DPO), Tom McDonnell, to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how GSA handles your personal information, please contact the DPO at [dataprotection@gas.ac.uk](mailto:dataprotection@gas.ac.uk).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues - <https://ico.org.uk/concerns>.

#### **Changes to this Privacy Notice**

If Human Resources make any changes to this Privacy Notice you will be informed either by an alert on the homepage of the website or corresponding with you directly.