

University of Cambridge

Registry's Office

Guidance on updating website privacy notices ('privacy policies') for the General Data Protection Regulation

This document is designed to help Institutions to update their website privacy policies in order to comply with the General Data Protection Regulation (GDPR), which will apply from 25 May 2018. See section 7.2 of the GDPR Toolkit at https://www.information-compliance.admin.cam.ac.uk/files/gdpr_toolkit_for_university_institutions_final.pdf.

1. A key aspect of data protection law is the requirement to inform individuals how their personal data is used by the University. These statements are usually known as 'privacy notices' (though in a website context they are almost always referred to as 'privacy policies').
2. Privacy notices exist in numerous contexts. The University has various 'core' privacy notices aimed at specific types of individual, such as applicants, students, alumni, staff, and so on (see section 1.1 of the GDPR Toolkit).
3. We also need to provide notices to visitors to our websites (see section 7.2 of the GDPR Toolkit).
4. We have published a new main website privacy policy at <http://www.cam.ac.uk/about-this-site/privacy-policy>.
5. Institutions should take the following steps:

If your website is 'read-only'

You should simply replace whatever privacy policy you currently have with a link to <http://www.cam.ac.uk/about-this-site/privacy-policy>.

The main website privacy policy explains that it covers www.cam.ac.uk and 'any website within the University of Cambridge domain which has pointed you to this page'. It covers the basic uses of personal data arising from website management, such as keeping logs and using cookies for site improvement, user analysis and security.

If your website asks website visitors to enter their personal data in any way(s)

You should review whatever privacy policy you currently have to ensure that it informs website visitors of the following:

Always:

- i) The purpose of the personal data use.
- ii) The legal basis for using it (e.g. to operate a contract with the individual or with their consent).
- iii) The retention period of the personal data.
- iv) Links to <http://www.cam.ac.uk/about-this-site/privacy-policy> and <https://www.information-compliance.admin.cam.ac.uk/data-protection/general-data>.

If applicable:

- v) Information about data sharing.
- vi) If you are also collecting information about these people from other sources, the categories and sources of those personal data. It is anticipated that this will be applicable only rarely.
- vii) Whether there is any statutory or contractual need to supply any personal data. It is anticipated that this will never be applicable.
- viii) Whether any automated decisions are taken based on the personal data that might affect the individual. It is anticipated that this will never be applicable.

As the above will be different depending upon what personal data is being collected through the website, these privacy policies need to be written locally. The text should be short; the language should be user-friendly and avoid technical jargon.

A template is attached.

You should make sure that you include a prominent link to your privacy policy at the start or end of the specific portal(s)/form(s)/webpage(s) where you ask website visitors to enter their personal data.

6. Questions may be addressed to James Knaption using the below details.

Dr James Knaption
Information Compliance Officer
Registrary's Office
9 March 2018

James.Knaption@admin.cam.ac.uk
(01223 3)32331

TEMPLATE

Introduction

This page explains what personal information we gather when you visit the specific website within the University of Cambridge domain called [insert website name].

Who will process my personal information?

The information published here applies to the use of your personal information (also known as 'personal data') by the University of Cambridge through the viewing or use of this site.

General personal information collected on our websites

When you visit any of the websites within the University of Cambridge domain we hold certain information about you for service and security reasons. For more information on this, please see <http://www.cam.ac.uk/about-this-site/privacy-policy>.

Specific personal information collected on this website

This site asks you to provide information about yourself [explain how e.g. in a form].

We gather this information so that we can [explain why it's collected e.g. process applications, send newsletters, manage bookings].

[Explain the legal basis i.e. EITHER 'We use this personal data to fulfil our "contractual" relationship with you' OR 'We use this personal information with your consent which you can withdraw at any time']

We share your data with [list external parties e.g. a funder, a collaborator] for them to [explain why you are sharing the data with them].

We will collect data about you from [explain any other sources of personal data e.g. referees, public sources].

We will hold your data for [give an indicative retention period].

Further information

For more information about how we handle your personal information, and your rights under data protection legislation, please see <https://www.information-compliance.admin.cam.ac.uk/data-protection/general-data>.

This page was last updated in [month and year].