

St Georges, University of London.

Reviewing and updating a Privacy Notice

Providing information about how you use personal data is a requirement under the Data Protection Act 2018 and relates to the individual's right to be informed.

Once in place, it is strongly recommended that you review your privacy notice on a regular basis, preferably at least yearly.

Your privacy notice should always be updated as soon as any changes are made to the way in which the personal data is being processed.

Further information about privacy notices can be found on the Information Commissioner's Office (ICO) website:

<https://ico.org.uk/for-organisations/guide-to-data-protection/privacy-notices-transparency-and-control/>

Reviewing your Privacy Notice

When carrying out your review you should:

1. Check that your notice meets all the relevant requirements under UK data protection legislation – please refer to the information on the ICO's website (see above).
2. Check that your privacy notice still accurately reflects how you are using personal data in relation to the processing covered by the notice.
3. Make sure that all relevant stakeholders are included when reviewing your notice.
4. Check that any internal contact details referenced on the notice are still valid, i.e. names, telephone numbers and email addresses.
5. Check that any URLs included on your notice are still correct.
6. Check that there is a date somewhere on your privacy notice to indicate when it was published, and therefore when it was valid from.
7. Keep a record of the dates when you have reviewed your notice(s).

If you do not need to make any changes to your notice then no further action is required.

Updating your Privacy Notice

When must you update

If you intend to use personal data for a completely new purpose then you must update your privacy notice, and you must do so *before* you actually start the new processing. NB new processing may require that a Data Protection Impact Assessment (DPIA) be completed.

You should also update your notice to reflect any change in terms of when, where or how personal data will be processed, e.g. if you are switching to a new service provider and the data centre where the personal data will be stored is based in a completely different country to the previous one.

You must also remember to amend the date on your privacy notice to confirm when the updated notice took effect.

If you are not sure whether you need to update your privacy notice to reflect a certain change, please contact the Data Protection Officer for advice.

Notifying individuals of updates to your privacy notice

If you make significant changes to your notice, such as for a new use of personal data, you must then look at how best to notify the relevant data subjects of these changes. Individuals should have the opportunity to opt-out or object to this new processing (unless a lawful basis exists that would preclude them from being able to opt-out, e.g. a legal obligation placed on the University to carry out the new processing).

It will not always be possible to actively inform data subjects, for example where you may not know who your data subjects are, such as visitors to your website, or where it would involve disproportionate effort to do so, as with large numbers of individuals for whom you only have limited contact details.

In the case of the University's own staff or students you could post the information to the relevant internal newsletter, something along the lines of "We have updated the Staff / Student privacy notice to reflect (whatever change has been made). You can find the updated privacy notice on the University website here".

Archiving old privacy notices

You should keep an archive of the old versions of your notices, including confirmation of the dates when they were in place. That way if there are any complaints, e.g. if someone claims they were not informed of something you are doing with their personal data when they first shared it with you, you can easily refer back to the version of the notice in place at that time.

Uploading your updated privacy notice

To update the copy of your privacy notice that appears on the University website, please send the updated version to webdevelopment@sgul.ac.uk and ask them to replace it for you.

Please note that simply correcting minor typos in a notice (where this does not change the actual meaning or sense of the relevant statement) does not constitute an 'update', so you would not need to change the date on the notice or archive it as an 'old' version.

Getting Help

If you have any other queries about how or when your privacy notice needs to be reviewed and updated, please contact the Data Protection Officer at dataprotection@sgul.ac.uk