

St George's Library Privacy Policy Notice

This notice sets out the basis on which Library Services at St George's University of London collects and uses the personal data of our users.

Our users include:

- St George's University of London students (including students of our Joint Faculty of Health and Social Care, University of Nicosia, elective and placement students)
- St George's University of London staff (including those with honorary contracts, staff from the Faculty of Health and Social Care and contractors)
- SGUL Alumni
- NHS Trust staff
- Staff and students of higher education institutions eligible through the SCONUL Access Scheme and through the University of London Libraries Access Agreement
- External visitors

Personal information we hold about you

We may collect and process the following data about you:

- name
- home address
- email address
- SGUL username
- library number
- SGUL department / department affiliation
- course completion date
- accessibility information
- job title (NHS staff)
- home institution (visitors)
- history of library usage e.g. items borrowed and requested, room and workshop bookings
- feedback responses e.g. from surveys and user studies

How we collect personal information about you

We collect most of the personal information we hold about you:

- through automatic data feeds from University systems
- directly from you via our online and paper forms

- in person at the Library Helpdesk
- in the course of providing our services to you (e.g. history of library usage) or after we have provided services to you (e.g. feedback responses).

How we use the information we hold about you and the legal basis for processing your data

We need the information listed above (see *Information we hold about you*) primarily to allow us to perform our contract with you. On many occasions we will process your data to enable SGUL to meet its commitments to you. We also use your data on the basis of consent in some circumstances (such as for promoting resources to NHS staff or sharing our current awareness bulletin). In some cases we may use your personal information to pursue a legitimate interest of our own or of a third party, provided your interests and fundamental rights do not override that interest. The "legitimate interest" is generally the interest of SGUL (or a third party) in providing or supporting the provision of higher education. The situations in which we will process your personal information are listed below.

We use the information we hold about you:

- to give you access to the library and computer rooms
- to provide and administer library services e.g. borrowing and requesting items, booking rooms and training
- to provide you with access to e-books, e-journals and databases.
- to respond to enquiries
- to facilitate the deposit of publication details in preparation for the Research Excellence Framework (REF)
- to facilitate the deposit of publications as required by the open access policies of St George's University of London and research funders
- to gather usage statistics
- for the continuous improvement of library services
- to improve accessibility to our services and resources
- to let you know about the services and resources that Library Services provide to NHS users (NHS user only)
- to administer Learning Technology systems

Change of purpose:

We will only use your personal information for the purposes for which we originally 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.

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.

Who we share your information with

Our systems rely on the sharing of data to manage services and supply information to you. Those systems are:

- Alma (Ex Libris) for circulation information
- Primo (Ex Libris) to manage your access to resources
- CRIS (Symplectic) for automatic harvesting of publication data
- Mailchimp for our NHS current awareness bulletin

All library users must comply with the Library rules and regulations. If you do not abide by our regulations we may share your personal data with your SGUL department the Alumni Office, or your home institution in order to ensure that our services are not compromised.

We do not pass your data to third party e-book, e-journal, database, reference management software or booking service providers. Where a third party service provider requires you to create an account, your contract is with that provider and your data is stored by them, not by St George's University of London.

Where access to e-books, e-journals and databases is via UK Federation, OpenAthens or University username and password your data will be anonymous at the point of use of the third party service.

Your feedback may be used anonymously for marketing purposes.

Information security

We have 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, we limit 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.

We have 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 as a data subject

You have the right to:

- withdraw consent where that is the legal basis of our processing
- access your personal data that we process
- rectify inaccuracies in personal data that we hold about you
- be forgotten i.e. for your details to be removed from systems that we use to process your personal data
- restrict the processing of your data in certain ways
- obtain a copy of your data in a commonly used electronic form
- object to certain processing of your personal data by us

For further information see the <u>Information Commissioner's Office</u> or contact SGUL's Data Protection Officer.

You have a right to complain to the <u>Information Commissioner's Office</u> about the way in which we process your personal data.

How long we keep your information for

Your information is stored in line with the University's retention schedule.

Anonymous data from surveys and feedback exercises is retained for a longer period to aid year on year comparisons.

Access to the information we hold about you

For access to your library account, sign in to Hunter (http://www.huntersearch.sgul.ac.uk). You will be able to see the contact information we hold about you and your borrowing history via the 'My Account' option.

If you wish to request copies of the data we hold about you please contact us via library@sgul.ac.uk

The University has a Data Protection Officer who can be contacted at:

Email: <u>dataprotection@sgul.ac.uk</u>

Tel: 020 8725 0668

Address: Data Protection Officer, Information Services, St George's University of London,

Cranmer Terrace, LONDON SW17 0RE

If you are unhappy with the way in which your personal data is being processed you may, in the first instance, lodge a complaint with the University Data Protection Officer using the contact details above.

If you continue to have concerns thereafter you have the right to contact the Information Commissioner for a decision. The Information Commissioner can be contacted as below

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Library & Learning Resources Notice valid from February 2021