

A Privacy policy - Wellcome Trust Centre for Human Genetics

The Wellcome Centre for Human Genetics (WHG) is a research institute of the University of Oxford. We are committed to protecting the privacy and security of your personal information ('personal data').

This policy describes how we collect and use your personal data during your use of our website (www.well.ox.ac.uk), in accordance with the General Data Protection Regulation (GDPR) and related UK data protection legislation.

If you have asked us to provide you with specific services the data protection provisions set out in our terms and conditions will apply to how we use personal data in the provision of those services.

B Who is using your personal data?

The University of Oxford¹ is the "data controller" for the information that you provide to us when visiting this website. This means that we decide how to use it and are responsible for looking after it in accordance with the GDPR.

Access to your personal data within the University will be provided to those staff who need to view it as part of their work in connection with the operation of this website and the work of the WHG. It will also be shared with the third parties described in Section H.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We may update this policy at any time.

By visiting our site you are accepting and consenting to the practices described in this policy

C Glossary

Where we refer in this policy to your 'personal data', we mean any recorded information that is about you and from which you can be identified. It does not include data where your identity has been removed (anonymous data).

Where we refer to the 'processing' of your personal data, we mean anything that we do with that information, including collection, use, storage, disclosure or retention.

D Types of data we collect about you

We will collect, store, and use the following categories of data when you use our site:

¹ The University's legal title is the Chancellor, Masters and Scholars of the University of Oxford

Data you give us. You may give us data about yourself including your name, email address, work address, phone number and communication content when you communicate with us, by email or otherwise, and when you submit an enquiry to us indicating your interest in our services or business.

Data we collect about you. If you consent to our use of cookies we will automatically collect:

- certain technical information, for example, the type of device (and its unique device identifier) you use to access our site, the Internet protocol (IP) address used to connect your device to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, mobile network information and platform; and
- information about your visit to our site including the full Uniform Resource Locators (URL), clickstream to, through and from the Website (including date and time), pages you viewed, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

E When we collect your data

We will collect the vast majority of data about you when you correspond with us by phone, e-mail or otherwise.

When you visit our site we may also automatically collect technical information about your visit from your computer.

F How we use your data

We process your data for one or more of the following reasons:

To provide you with the services, products and/or information you have requested. This processing is necessary to meet our contractual obligations to you or to take steps requested by you prior to entering into a contract.

Information processed for this purpose includes, but is not limited to your name, email address, work address and phone number.

For purposes arising from your use of this website, for example, to ensure that we understand who uses our site and how our site is used and to improve our site and ensure it is secure. This processing occurs because it is necessary to meet our legitimate interests, namely the proper administration of the website and our communications.

We will only use your data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

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

H Sharing your data with third parties

We may share your data with our suppliers or subcontractors, such as:

- organisations which host the servers on which our data is stored. Currently our servers, including those on which the website is hosted, are located at the University of Oxford. However, we may use external hosts in the future; and
- our email service providers, on whose servers our correspondence may be stored temporarily or backed up longer-term, and to mail service providers.

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

We may also share your personal data with third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our site terms of use or to protect the rights, property or safety of our site, our users, and others.

Where your data is shared with third parties, we will seek to share the minimum amount necessary.

I Where we store or use your data

We may store data collected by the website manually or electronically. There may be occasions when we transfer your data outside the European Economic Area (EEA), for example, when we store your data on a database using a service provider that operates outside the EEA such as Salesforce, Clarity, Evernote and Labarchive. Such transfers will only take place if one of the following applies:

- the country receiving the data is considered by the EU to provide an adequate level of data protection;
- the organisation receiving the data is covered by an arrangement recognised by the EU as providing an adequate standard of data protection e.g. transfers to companies that are certified under the EU US Privacy Shield;
- the transfer is governed by approved contractual clauses;
- the transfer has your consent;

- the transfer is necessary for the performance of a contract with you or to take steps requested by you prior to entering into that contract; or
- the transfer is necessary for the performance of a contract with another person, which is in your interests.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data transmitted to the website and any transmission is at your own risk.

K Retaining your data

We will only retain your data for as long as we need it to fulfil our purposes, including any relating to legal, accounting, or reporting requirements.

Your correspondence with us, which may contain your personal data, will be retained for up to 25 years to enable us to refer to your previous correspondence if you contact us again.

L Your rights

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

- **Request access to your data** (commonly known as a "subject access request"). This enables you to receive a copy of your data and to check that we are lawfully processing it.
- **Request correction of your data.** This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- **Request erasure of your data.** This enables you to ask us to delete or remove your data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).
- **Object to processing of your data where we are relying on our legitimate interests** (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.
- **Request the restriction of processing of your data.** This enables you to ask us to suspend the processing of your data, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your data to another party.**

Depending on the circumstances and the nature of your request it may not be possible for us to do what you have asked, for example, where there is a statutory or contractual requirement for us to process your data and it would not be possible to fulfil our legal obligations if we were to stop. However, where you have consented to the processing (for example, where you have asked us to contact you for marketing purposes) you can withdraw your consent at any time by emailing us at genomicsinfo@well.ox.ac.uk. In this event, we will stop the processing as soon as we can. However, this will not affect the lawfulness of any processing carried out before your withdrawal of consent and you may no longer be able to use the site in the same way as you did before.

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, you should contact the University's [Information Compliance Team](#) at data.protection@admin.ox.ac.uk. The same email address may be used to contact the University's Data Protection Officer. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

If you remain dissatisfied, you have the right to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

M Cookies

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie policy [<http://www.well.ox.ac.uk/ogc/cookie-policy/>].

N Changes to this policy

Any changes we may make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

O Contact

If you wish to raise any queries or concerns about this privacy policy please contact us at genomicsinfo@well.ox.ac.uk or Dr David Buck, Wellcome Centre for Human Genetics, Headington, Oxford. OX3 7BN.