



# GDPR: AFTER THE DUST HAS SETTLED

**LONDON'S EVENING UNIVERSITY**

# INTRODUCTIONS

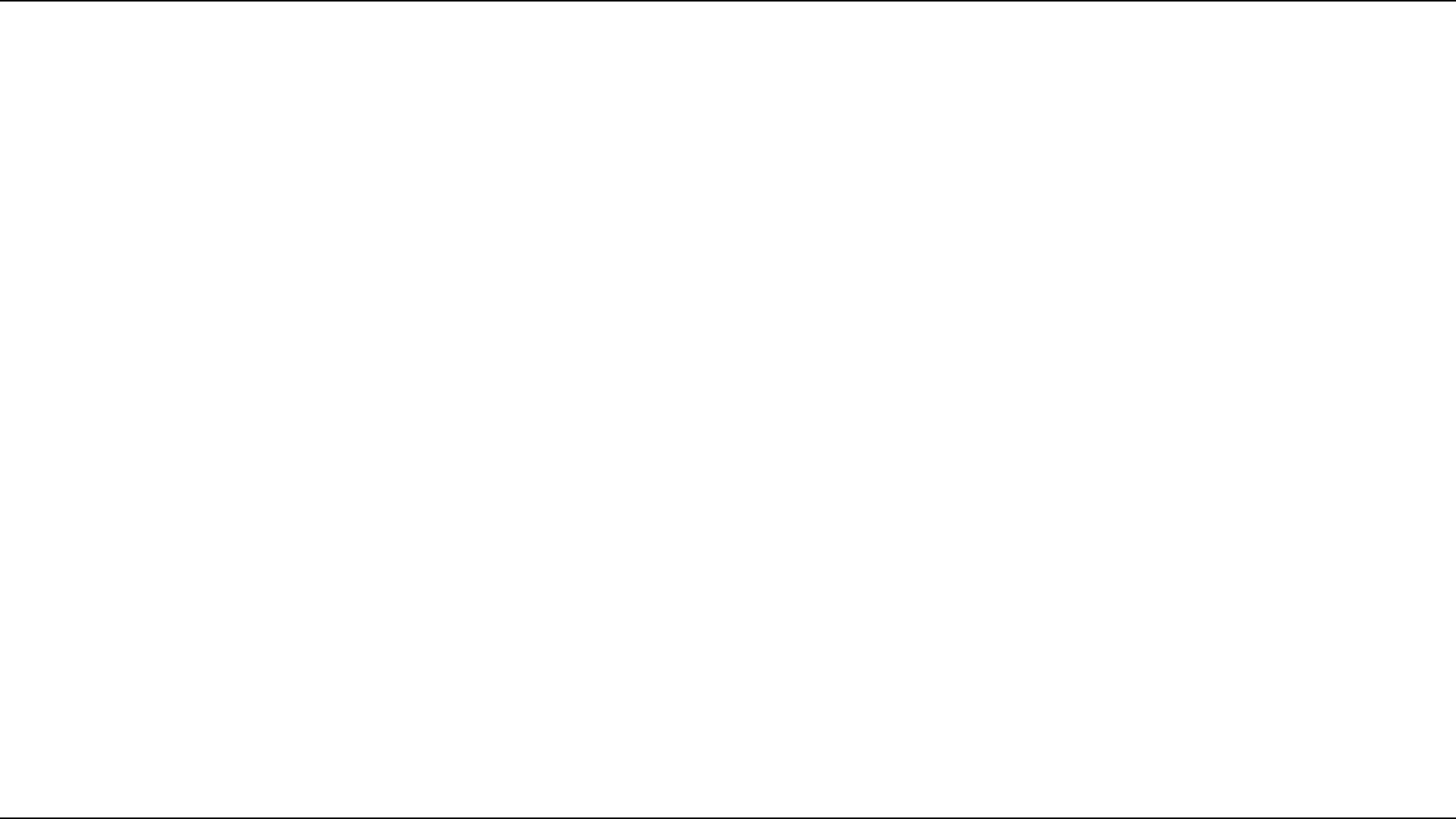
## James Smith

- Director of IT, Birkbeck

## Birkbeck, University of London

- Established by George Birkbeck in 1823 as London Mechanic's Institute
- Celebrating 100 years in University of London in 2020
- Original and ongoing mission is the provision of Higher Education, face-to-face, to working Londoners
- 50% of all classes start at 6:00PM on a weekday evening

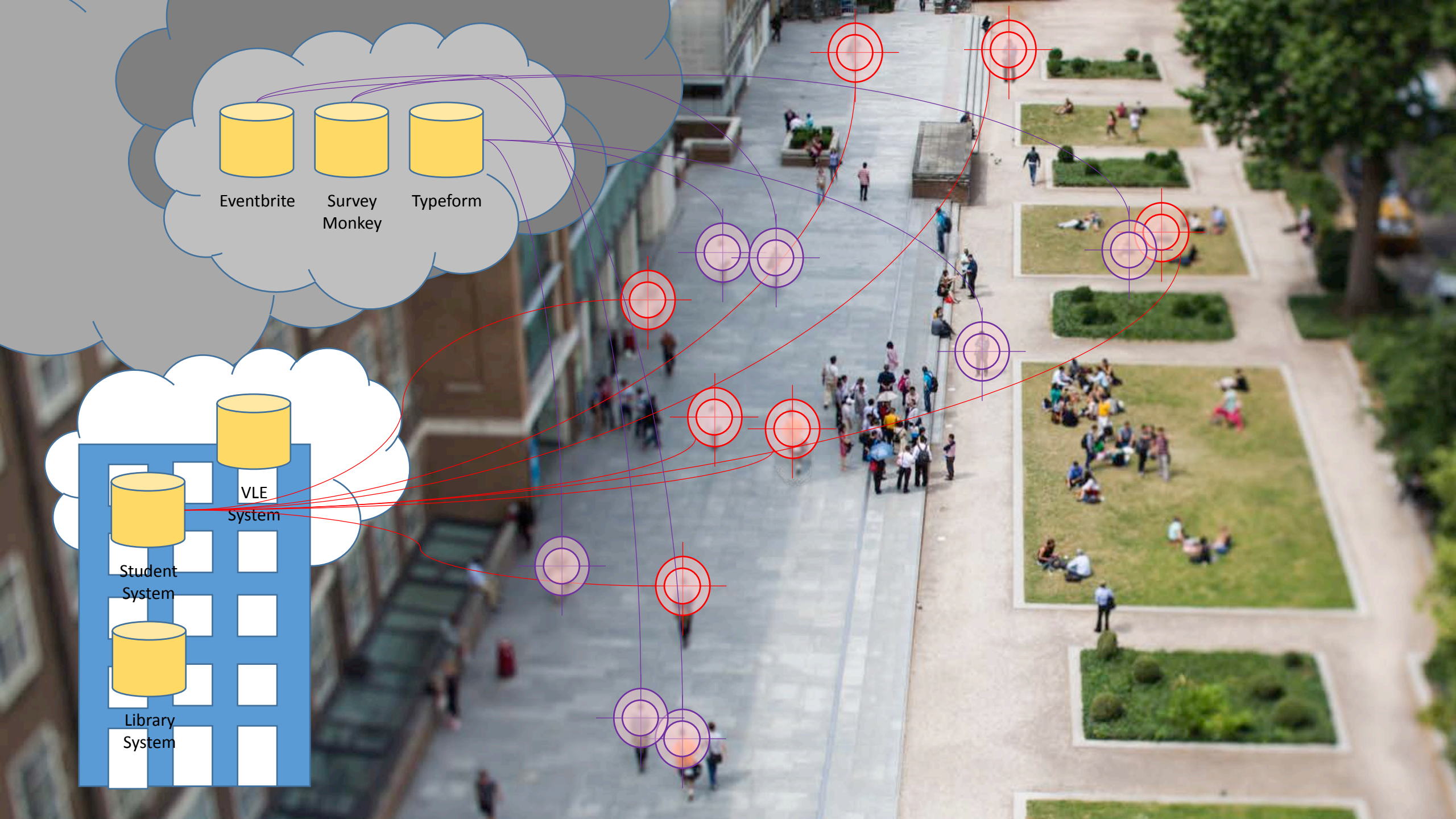




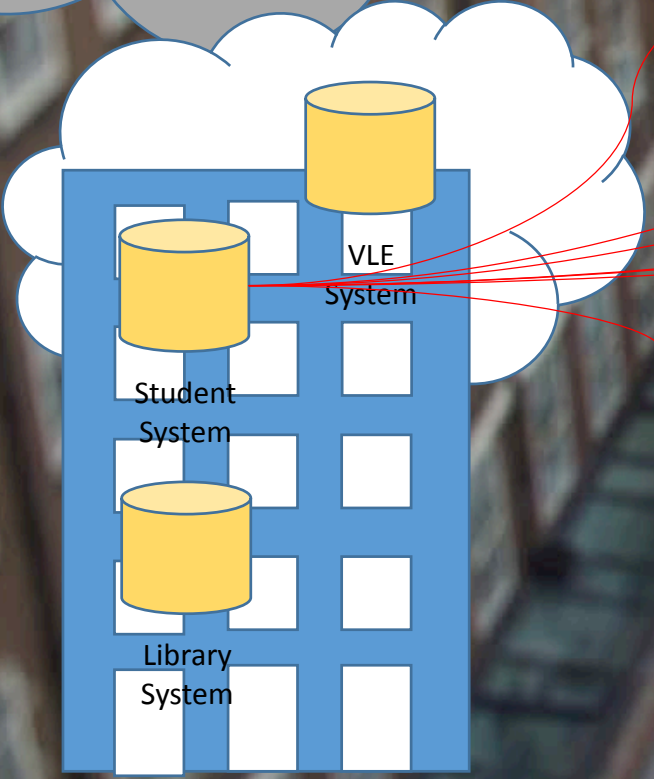
**GDPR**

**Really? ...**

**FINISHED!**



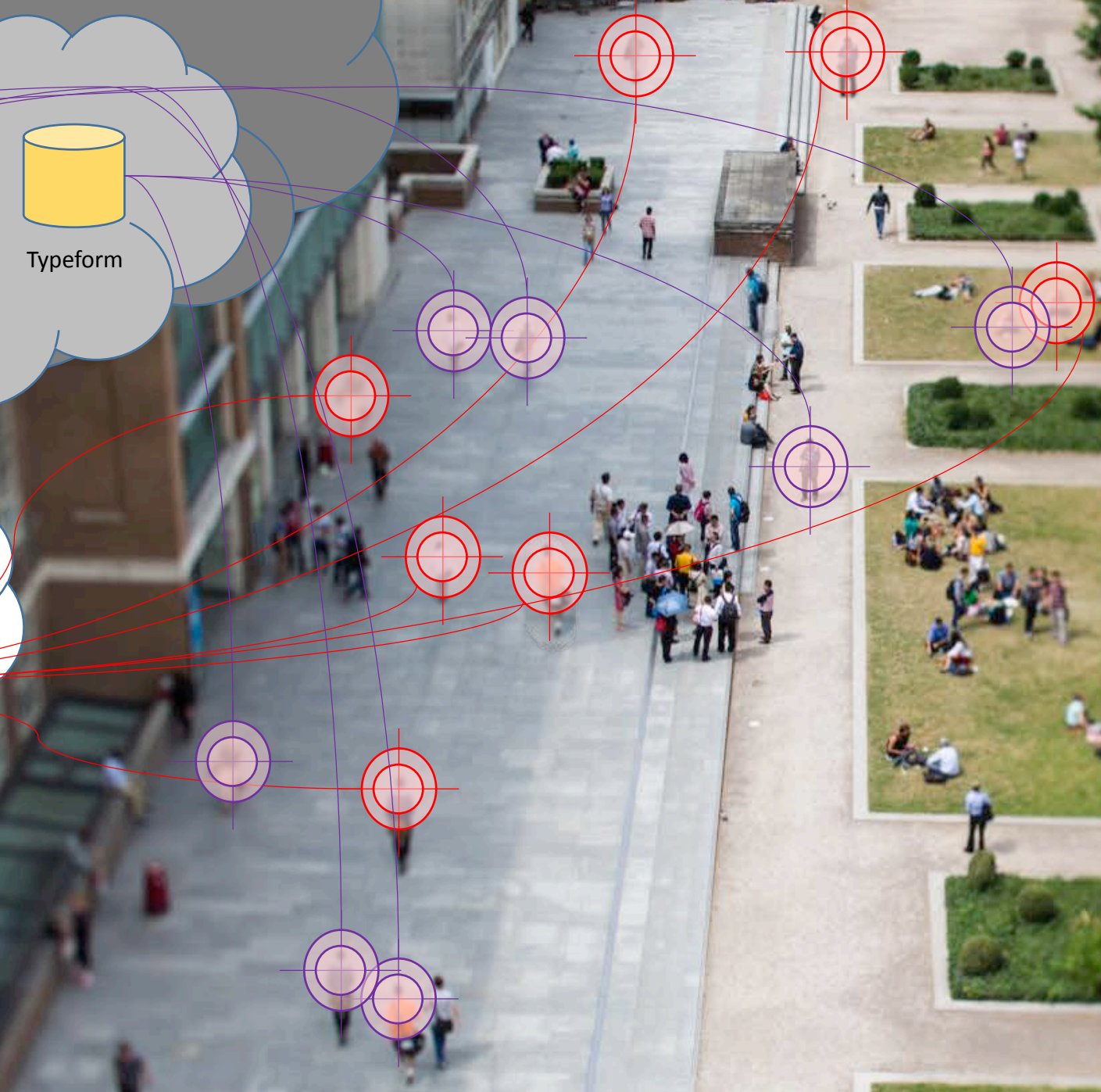
Eventbrite    Survey Monkey    Typeform



VLE System

Student System

Library System





Eventbrite



Survey  
Monkey



Typeform



VLE  
System



Student  
System



Library  
System

**DUPLICATE  
IDENTITIES**

# PROBLEMS WE NOTED

**GDPR is focussed on PROCESSING PURPOSES no DATA STORES**

- But staff don't get that

**We have multiple disconnected processing activities**

- To an extent within the set of activities supported by centrally provided IT
- Certainly when you include 'self-sourced' IT solutions

# NO COMPLETE VIEW OF PROCESSING

## **This is a problem**

- Most HEIs are a single data controller
- Transparency – how can you clearly explain to a data subject what processing is being done?
- Individual Rights – how can you act on requests under individual rights?
- Accountability & Governance requirements: documentation – essentially you “need to know what you’re processing, how, where and why”



# TWO PARTICULAR PROCESSING ACTIVITIES

## Events

- Run all over the institution
- 99% of them historically using Eventbrite\*

## Mailing Lists

- Again – maintained all over the place
- Typeform
- Survey Monkey
- Spreadsheets....

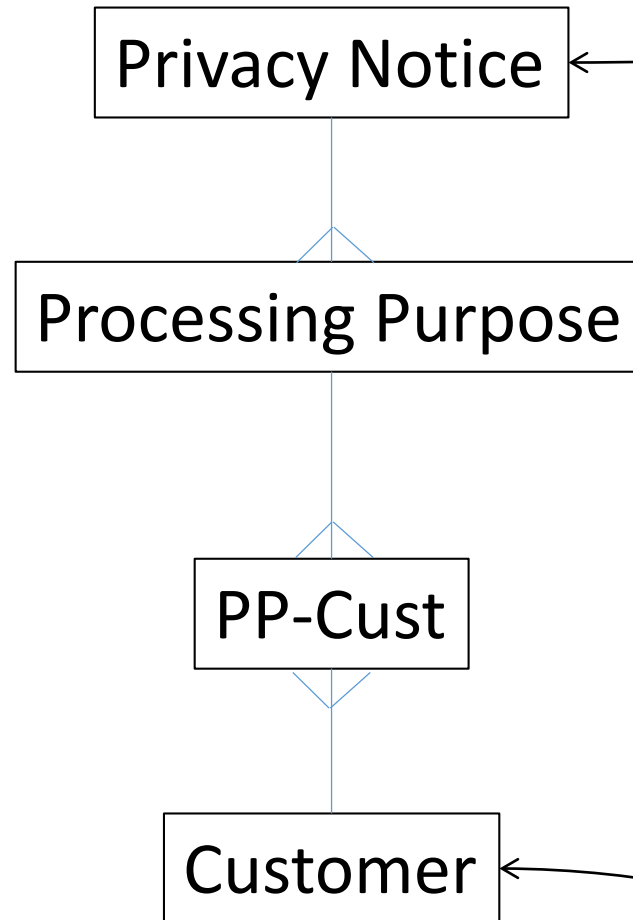
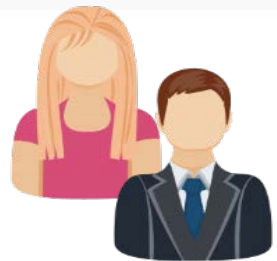
\* fabricated statistic

# WE REVERTED TO TYPE


Identified a  data model

 Created a  
database

# PUBLIC PRIVACY INFORMATION



*Lots of these, highly granular*



Using Birkbeck online & IT facilities  
We are processing your personal data in order to provide you with a user account to access our services. [This privacy notice](#) document describes this processing.

*Lots of these too, with a wide variety of relationships with Birkbeck*

# MY PRIVACY CONTROL

## Anatomy of MPC for example individual



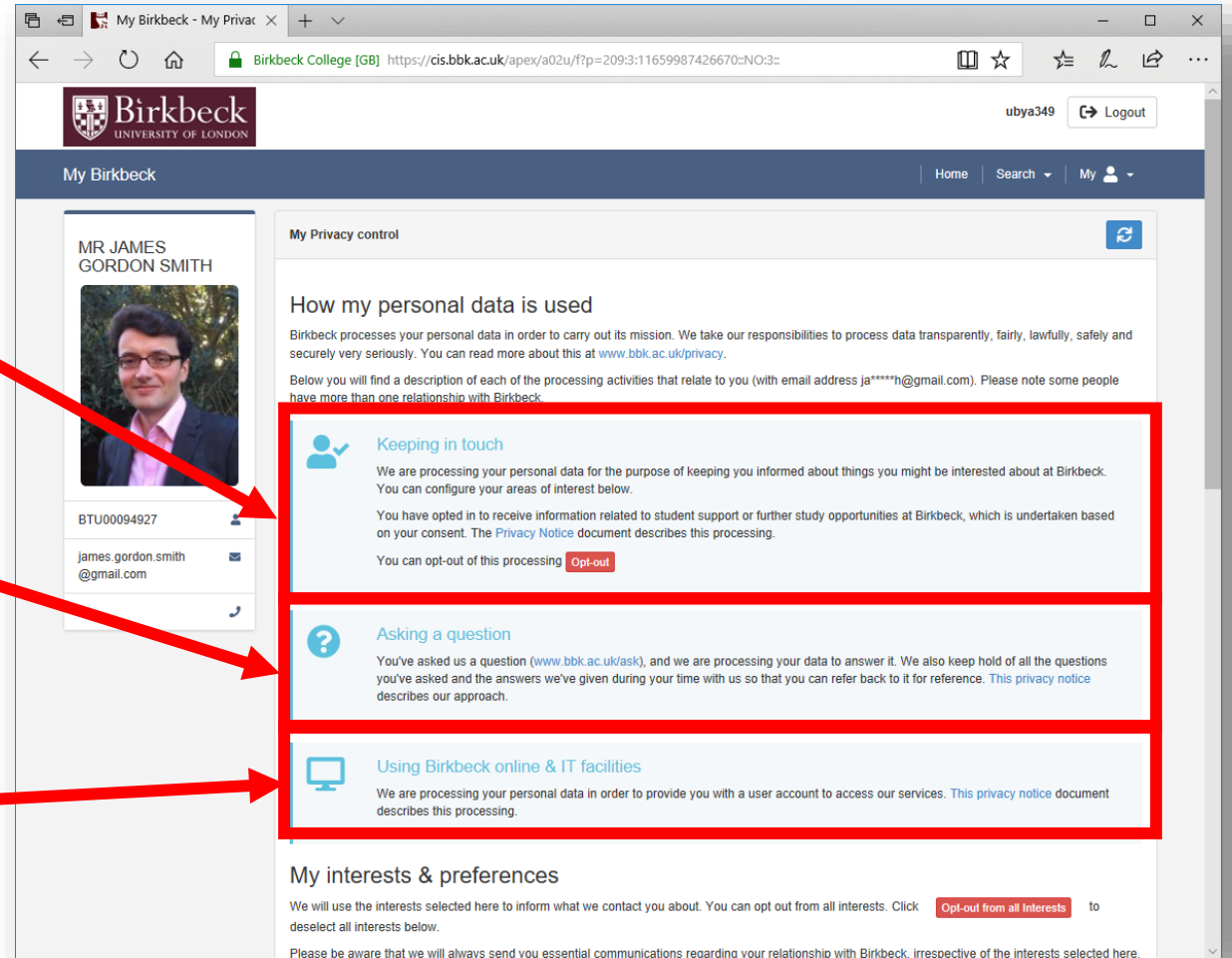
Prospectus Request



ASK a question



Get an IT user account



My Birkbeck - My Privacy control

MR JAMES GORDON SMITH

BTU00094927

james.gordon.smith@gmail.com

### How my personal data is used

Birkbeck processes your personal data in order to carry out its mission. We take our responsibilities to process data transparently, fairly, lawfully, safely and securely very seriously. You can read more about this at [www.bbk.ac.uk/privacy](http://www.bbk.ac.uk/privacy).

Below you will find a description of each of the processing activities that relate to you (with email address ja\*\*\*\*h@gmail.com). Please note some people have more than one relationship with Birkbeck.

- Keeping in touch**  
We are processing your personal data for the purpose of keeping you informed about things you might be interested about at Birkbeck. You can configure your areas of interest below.  
You have opted in to receive information related to student support or further study opportunities at Birkbeck, which is undertaken based on your consent. The [Privacy Notice](#) document describes this processing.  
You can opt-out of this processing [Opt-out](#)
- Asking a question**  
You've asked us a question ([www.bbk.ac.uk/ask](http://www.bbk.ac.uk/ask)), and we are processing your data to answer it. We also keep hold of all the questions you've asked and the answers we've given during your time with us so that you can refer back to it for reference. [This privacy notice](#) describes our approach.
- Using Birkbeck online & IT facilities**  
We are processing your personal data in order to provide you with a user account to access our services. [This privacy notice](#) document describes this processing.

### My interests & preferences

We will use the interests selected here to inform what we contact you about. You can opt out from all interests. Click [Opt-out from all interests](#) to deselect all interests below.

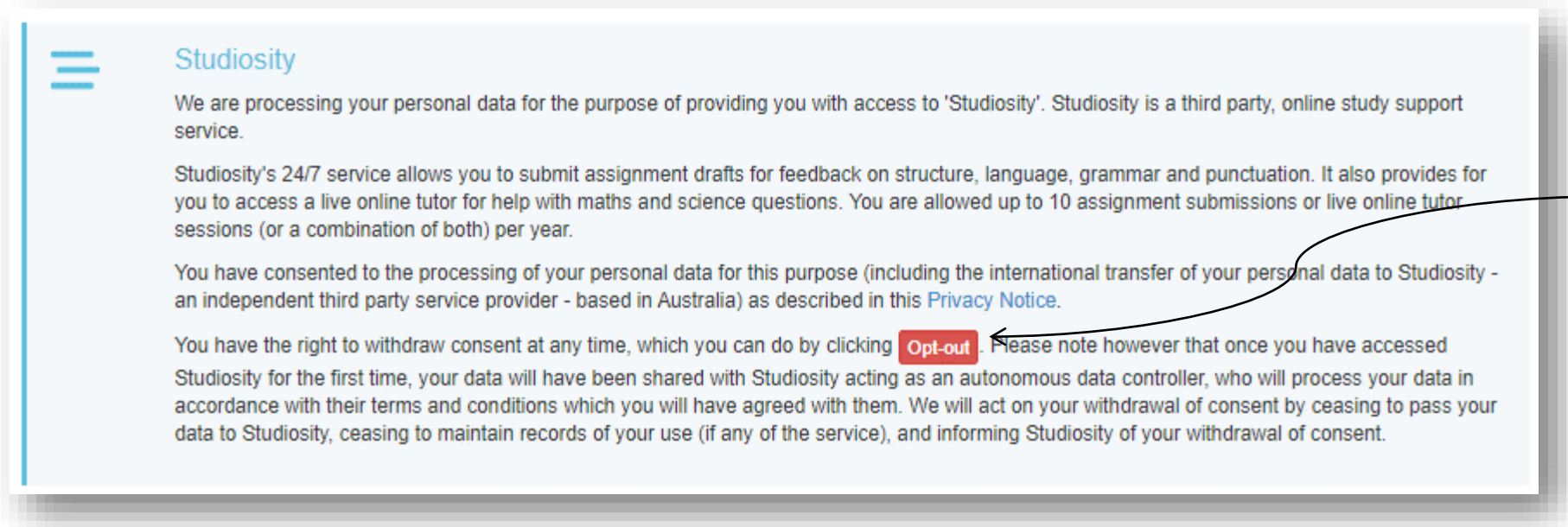
Please be aware that we will always send you essential communications regarding your relationship with Birkbeck, irrespective of the interests selected here.

# PRIVACY NOTICES

ID	Version date	Processing purposes covered	Scope
BBKPN001.2	21 August 2019	<a href="#">Admissions and study</a>	For people who wish to study at Birkbeck, are in the process of study at Birkbeck, or who have finished study at Birkbeck (commonly referred to as applicants, students and former students).
BBKPN002.1	26 Jun 2018	<a href="#">Keeping in touch</a>	For the purpose of keeping in touch with people who want to hear about opportunities and events at Birkbeck. In particular this includes marketing to prospective students who may wish to study at Birkbeck.
BBKPN003.0	24 May 2018	<a href="#">Visitors to our website and online self-service applications</a>	Our use of monitoring facilities to track your use of our public websites (such as www.bbk.ac.uk) and online services (such as My Birkbeck, Moodle, Panopto).
BBKPN004.1	6 June 2019	<a href="#">Friends, alumni and donors</a>	How we collect, use and share personal data and your rights in relation to information we hold about our alumni.
BBKPN005.0	25 May 2018	<a href="#">Staff</a>	In order to carry out its duties as an employer, Birkbeck must collect and process data relating to its staff. This privacy notice explains how we collect, use and share your personal data and your rights in relation to your information.
BBKPN006.1	26 Jun 2018	<a href="#">IT User Account</a>	For the purpose of providing IT user accounts (Birkbeck accounts).
BBKPN007.1	26 Jun 2018	<a href="#">Library user</a>	For the purpose of using library services.
BBKPN008.1	26 Jun 2018	<a href="#">ASK</a>	For the purpose of operating a managed process to receive, record and resolve queries from enquirers.
BBKPN009.2	11 Dec 2018	<a href="#">Research</a>	For the purpose of conducting research for the benefit of society.
BBKPN010.2	11 Dec 2018	<a href="#">Birkbeck Talent</a>	For the purpose of Birkbeck Talent - Birkbeck's specialist recruitment consultancy.
BBKPN011.1	17 Mar 2019	<a href="#">Events</a>	For the purpose of organising, booking and attending events.
BBKPN012.0	28 May 2019	<a href="#">Payment Gateway</a>	For the purpose of processing online payments.
BBKPN013.2	30 July 2019	<a href="#">Promotion</a>	For the purpose of promoting College activities and student life.
BBKPN014.3	30 July 2019	<a href="#">Student research</a>	For the purpose of representing research students and their research.
BBKPN017.2	29 Sep 2018	<a href="#">Studiosity</a>	For the purpose of providing Birkbeck students with access to Studiosity.

# MORE ON MY PRIVACY CONTROL

- Auditing processing purposes (for an individual customer)
- Especially important for consent “*why did I get sent this email?....*”
- Withdrawal of consent



The screenshot shows a privacy notice for 'Studiosity'. It includes a menu icon on the left, the title 'Studiosity', and four paragraphs of text. The third paragraph contains a red 'Opt-out' button. An arrow points from the text 'Where the lawful basis for processing is consent, we have to be able to provide a mechanism to withdraw consent' to the 'Opt-out' button.

**Studiosity**

We are processing your personal data for the purpose of providing you with access to 'Studiosity'. Studiosity is a third party, online study support service.

Studiosity's 24/7 service allows you to submit assignment drafts for feedback on structure, language, grammar and punctuation. It also provides for you to access a live online tutor for help with maths and science questions. You are allowed up to 10 assignment submissions or live online tutor sessions (or a combination of both) per year.

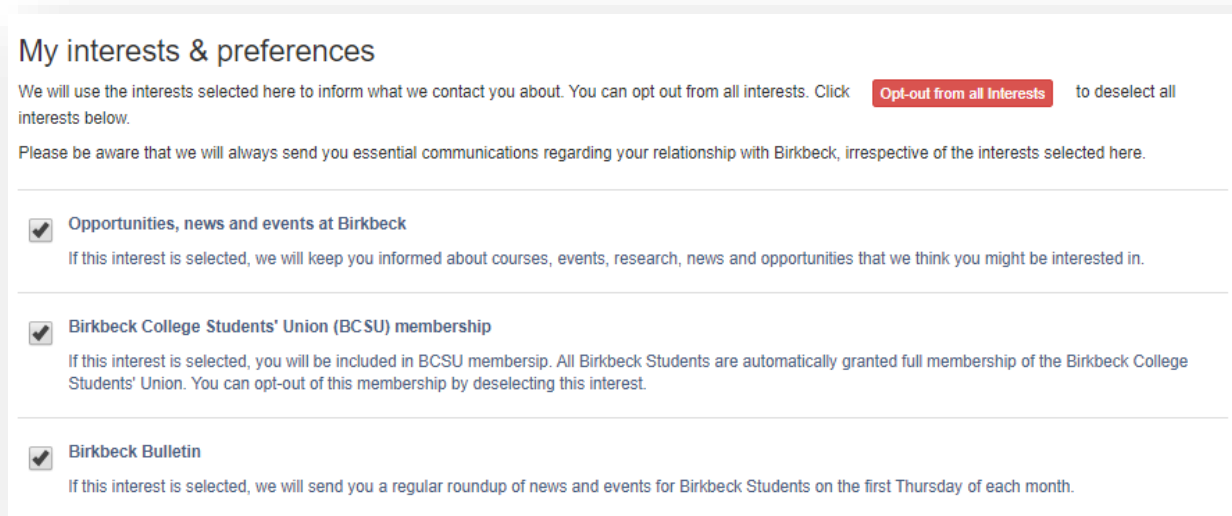
You have consented to the processing of your personal data for this purpose (including the international transfer of your personal data to Studiosity - an independent third party service provider - based in Australia) as described in this [Privacy Notice](#).

You have the right to withdraw consent at any time, which you can do by clicking **Opt-out**. Please note however that once you have accessed Studiosity for the first time, your data will have been shared with Studiosity acting as an autonomous data controller, who will process your data in accordance with their terms and conditions which you will have agreed with them. We will act on your withdrawal of consent by ceasing to pass your data to Studiosity, ceasing to maintain records of your use (if any of the service), and informing Studiosity of your withdrawal of consent.

*Where the lawful basis for processing is consent, we have to be able to provide a mechanism to withdraw consent*

# EVEN MORE ON MY PRIVACY CONTROL

- A mechanism for maintaining ‘interests’
- A sub-set of Processing Purposes say we will process data to maintain contact about areas of interest
- For customers who have this processing purpose, we allow the maintenance of interests



My interests & preferences

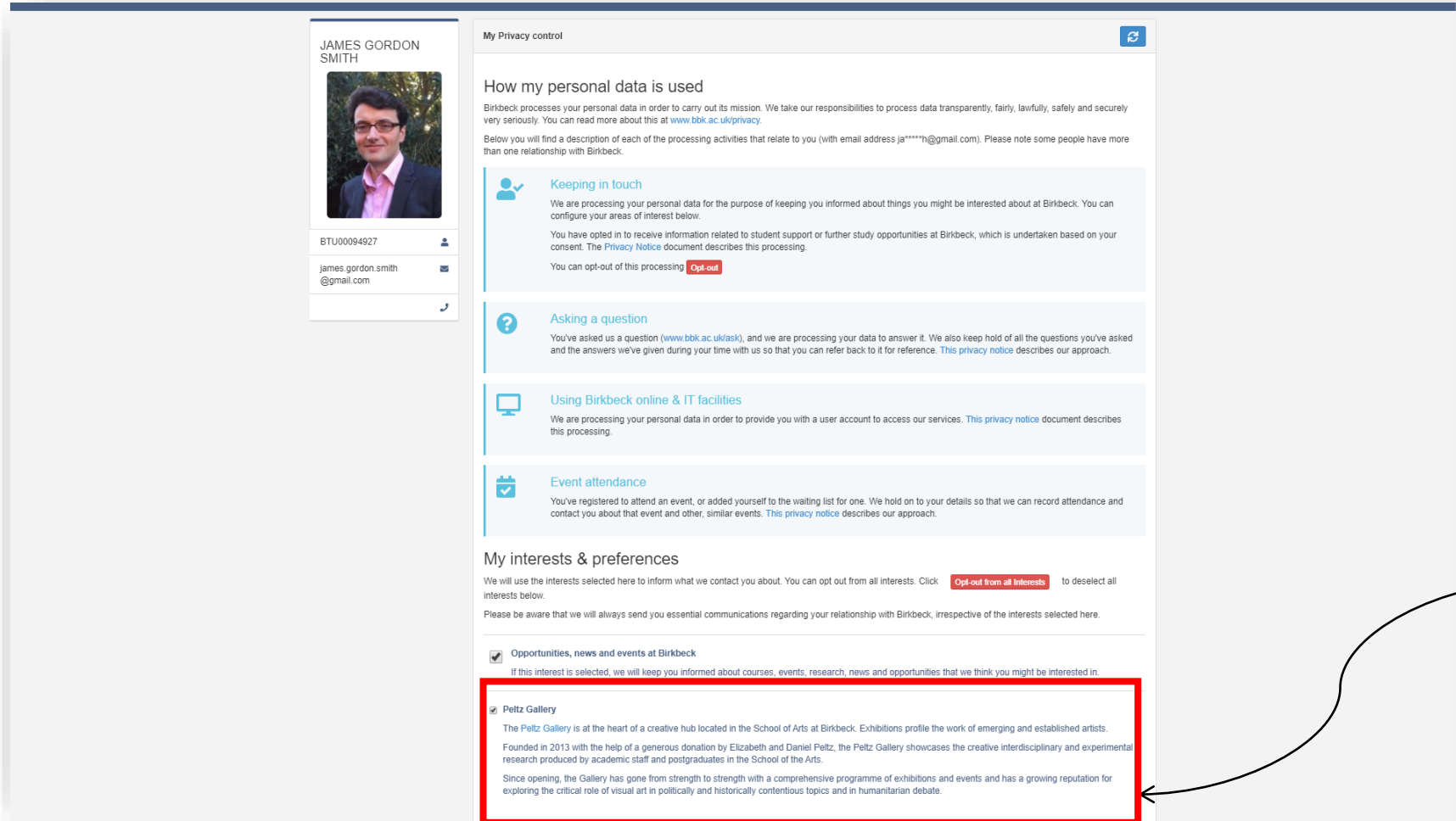
We will use the interests selected here to inform what we contact you about. You can opt out from all interests. Click [Opt-out from all Interests](#) to deselect all interests below.

Please be aware that we will always send you essential communications regarding your relationship with Birkbeck, irrespective of the interests selected here.

- Opportunities, news and events at Birkbeck**  
If this interest is selected, we will keep you informed about courses, events, research, news and opportunities that we think you might be interested in.
- Birkbeck College Students' Union (BCSU) membership**  
If this interest is selected, you will be included in BCSU membership. All Birkbeck Students are automatically granted full membership of the Birkbeck College Students' Union. You can opt-out of this membership by deselecting this interest.
- Birkbeck Bulletin**  
If this interest is selected, we will send you a regular roundup of news and events for Birkbeck Students on the first Thursday of each month.

*The interests we allow control over vary by customer (e.g. students can select a wider list than prospects)*

# INTERESTS -> MAILING LISTS



**My Privacy control**

**How my personal data is used**

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You can opt-out of this processing: **Opt-out**
- Asking a question**  
You've asked us a question ([www.bbk.ac.uk/ask](http://www.bbk.ac.uk/ask)), and we are processing your data to answer it. We also keep hold of all the questions you've asked and the answers we've given during your time with us so that you can refer back to it for reference. [This privacy notice](#) describes our approach.
- Using Birkbeck online & IT facilities**  
We are processing your personal data in order to provide you with a user account to access our services. [This privacy notice](#) document describes this processing.
- Event attendance**  
You've registered to attend an event, or added yourself to the waiting list for one. We hold on to your details so that we can record attendance and contact you about that event and other, similar events. [This privacy notice](#) describes our approach.

**My interests & preferences**

We will use the interests selected here to inform what we contact you about. You can opt out from all interests. Click **Opt-out from all interests** to deselect all interests below.

Please be aware that we will always send you essential communications regarding your relationship with Birkbeck, irrespective of the interests selected here.

- Opportunities, news and events at Birkbeck**  
If this interest is selected, we will keep you informed about courses, events, research, news and opportunities that we think you might be interested in.
- Peltz Gallery**  
The **Peltz Gallery** is at the heart of a creative hub located in the School of Arts at Birkbeck. Exhibitions profile the work of emerging and established artists. Founded in 2013 with the help of a generous donation by Elizabeth and Daniel Peltz, the Peltz Gallery showcases the creative interdisciplinary and experimental research produced by academic staff and postgraduates in the School of the Arts. Since opening, the Gallery has gone from strength to strength with a comprehensive programme of exhibitions and events and has a growing reputation for exploring the critical role of visual art in politically and historically contentious topics and in humanitarian debate.

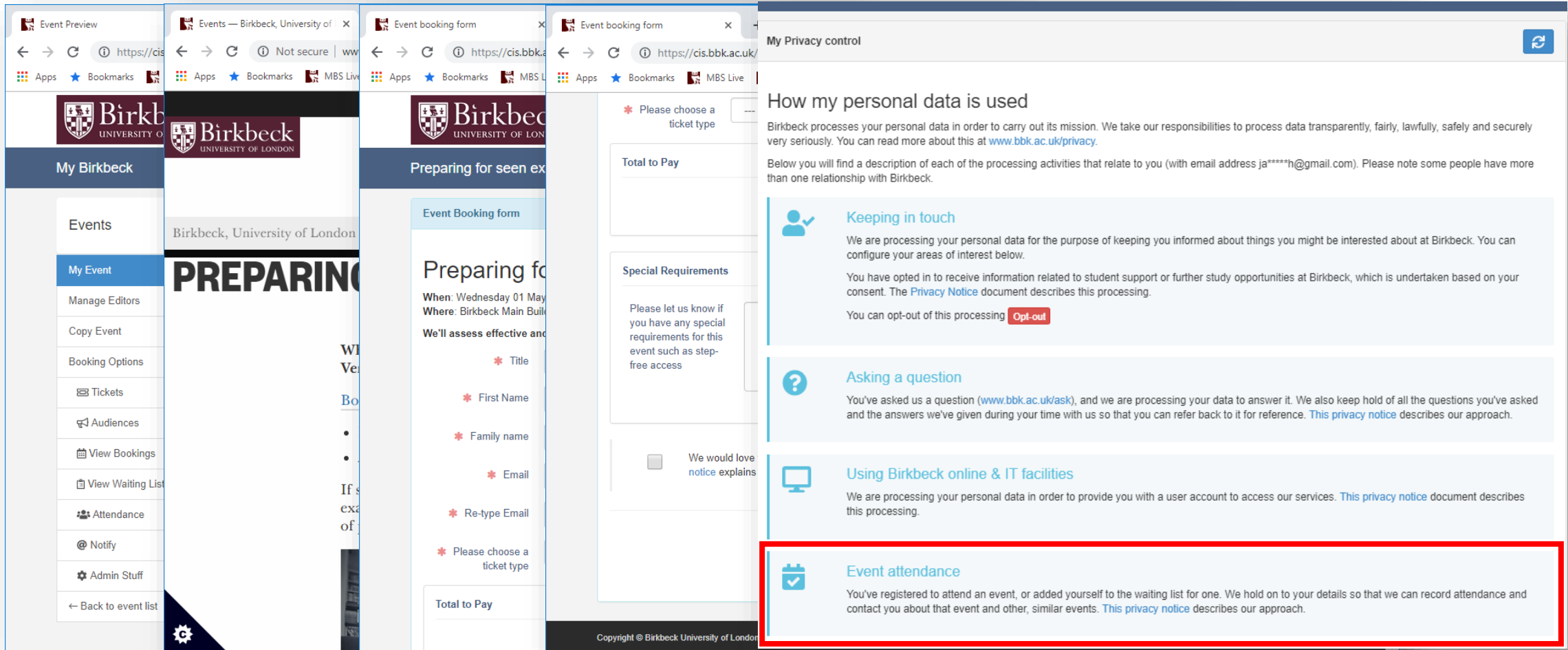
1. Part of organisation wants to maintain mailing list

2. Data-generated interest registration form, explains processing purpose, seeks consent to KiT

3. Interest is added to customers record (and processing purposes updated where necessary)



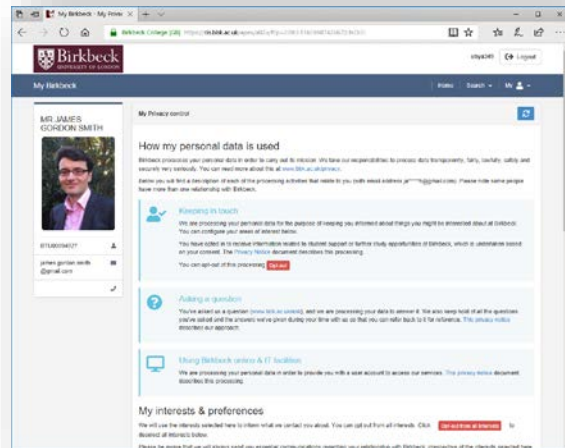
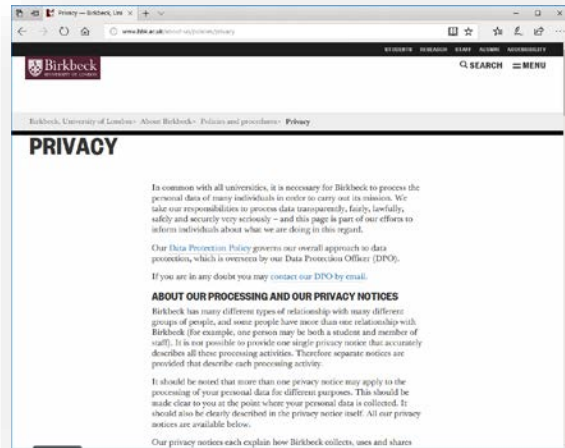
# EVENT MANAGEMENT



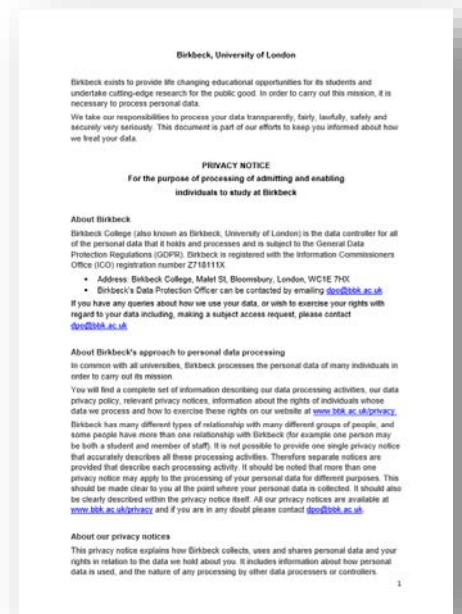
The image displays a collage of browser windows from the Birkbeck University of London event management system. The primary window shows an event booking form for an event on Wednesday 01 May at Birkbeck Main Building. The form includes fields for Title, First Name, Family name, Email, and Re-type Email, along with a 'Please choose a ticket type' dropdown. A 'Total to Pay' field is also visible. A secondary window shows a 'My Privacy control' page titled 'How my personal data is used'. This page explains that Birkbeck processes personal data to carry out its mission and lists several processing activities:

- Keeping in touch:** Processing data to keep you informed about things you might be interested in. Includes an 'Opt-out' button.
- Asking a question:** Processing data to answer questions and keep records for reference.
- Using Birkbeck online & IT facilities:** Processing data to provide user accounts for accessing services.
- Event attendance:** Processing data to record attendance and contact you about events. This section is highlighted with a red border.

# PUBLIC PRIVACY INFORMATION



- Birkbeck's customer-facing privacy information
  - [www.bbk.ac.uk/privacy](http://www.bbk.ac.uk/privacy)
  - Approach (many, granular notices – one or more may apply)
  - Privacy Notices
  - Individual rights
- My Privacy Control
- [www.bbk.ac.uk/myprivacycontrol](http://www.bbk.ac.uk/myprivacycontrol)
- Personalised information
- Interests/preferences



# DUST IS STILL SETTLING

## **This is an iterative process**

- There is lots of processing under the radar... but it is getting better
- DPIA process poorly understood... but again improving
- Having structure really helps, because then you are developing and extending something solid
- Not sure all of the sector are at the same part of the journey (some privacy notices still don't call out lawful basis of processing for example)

## **Clearly other issues too...**

- Security is critical – sector wide this is a current issue
- Resilience also important!

ANY  
QUESTIONS?





# MY BIRKBECK

IDB & AD

TDS & eRegisters

Study Support Plan

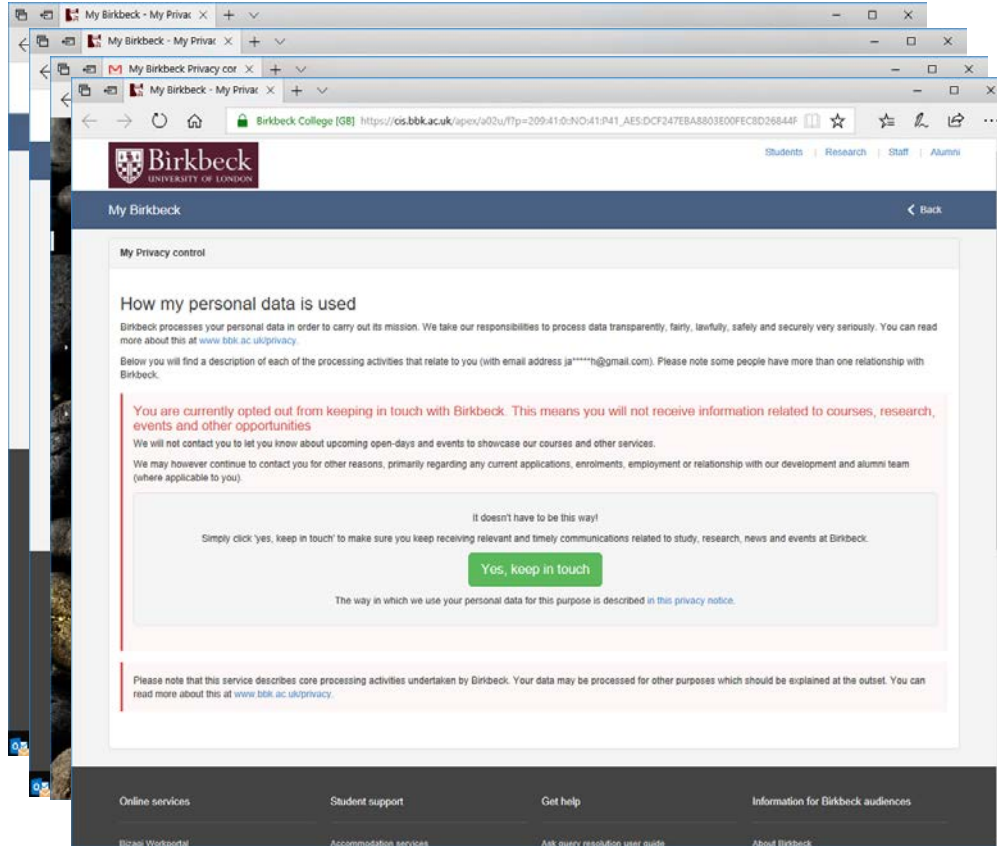
SITS

TRM & Kinetix

Bond

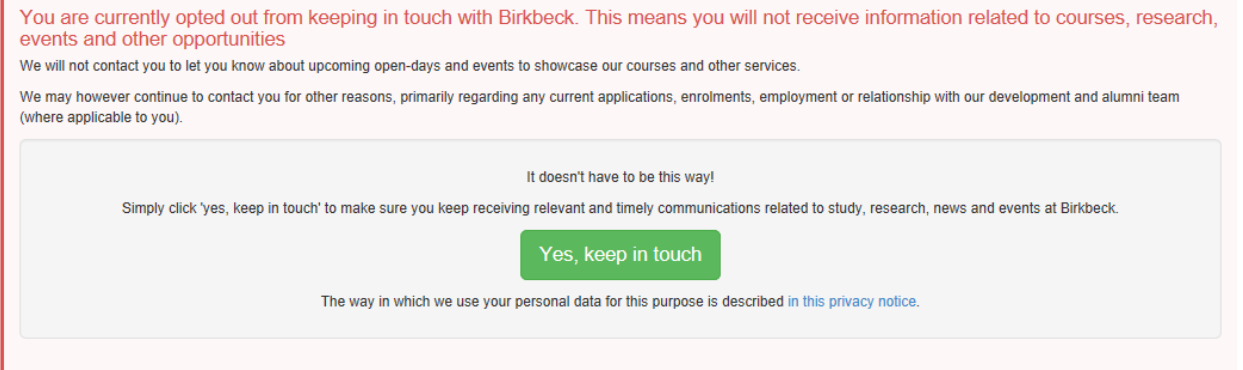
Abintegro

# MY PRIVACY CONTROL (1)



## Example: 'Brand new' person

- Visits My Privacy Control
- Enters their email address
- Gets emailed a link
- Follows link -> sees that there is no processing



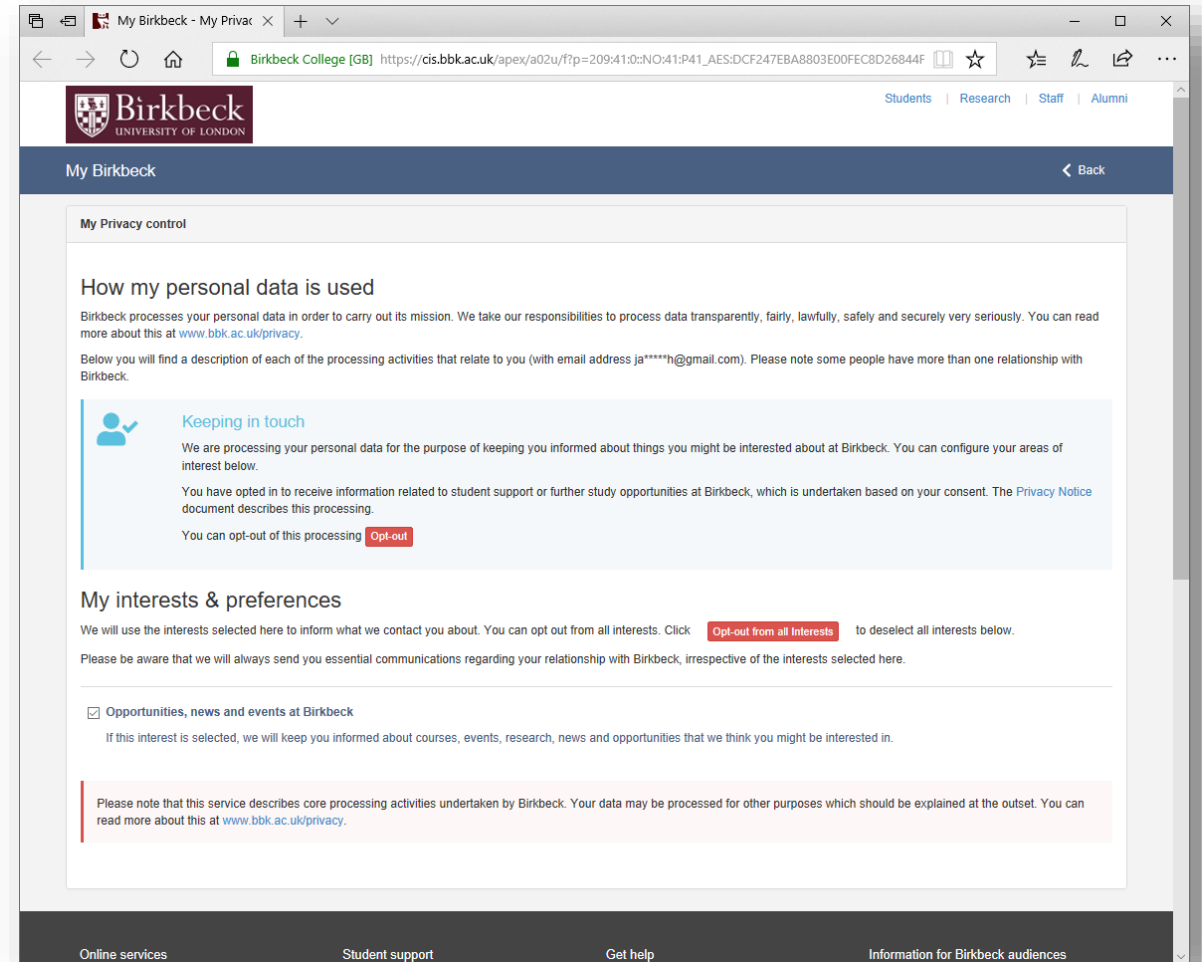
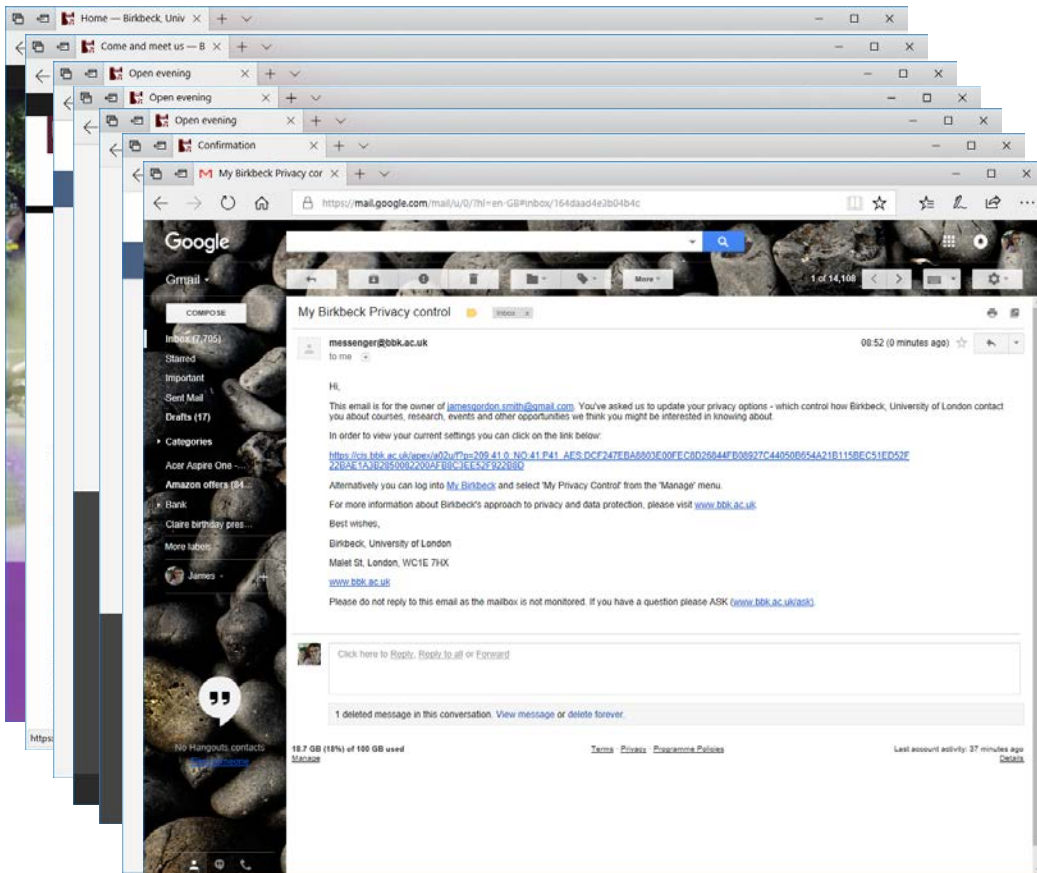
# MY PRIVACY CONTROL (2)

- Keep in touch resulting from
  - Opt-in to 'Keep in touch' via MPC
  - Book on Open Evening, Request Prospectus, Enquiry Form
  - Compete Interest Registration form
    - All require **consent to Keep In Touch**
    - **MPC provides facility to remove consent**



# MY PRIVACY CONTROL (3)

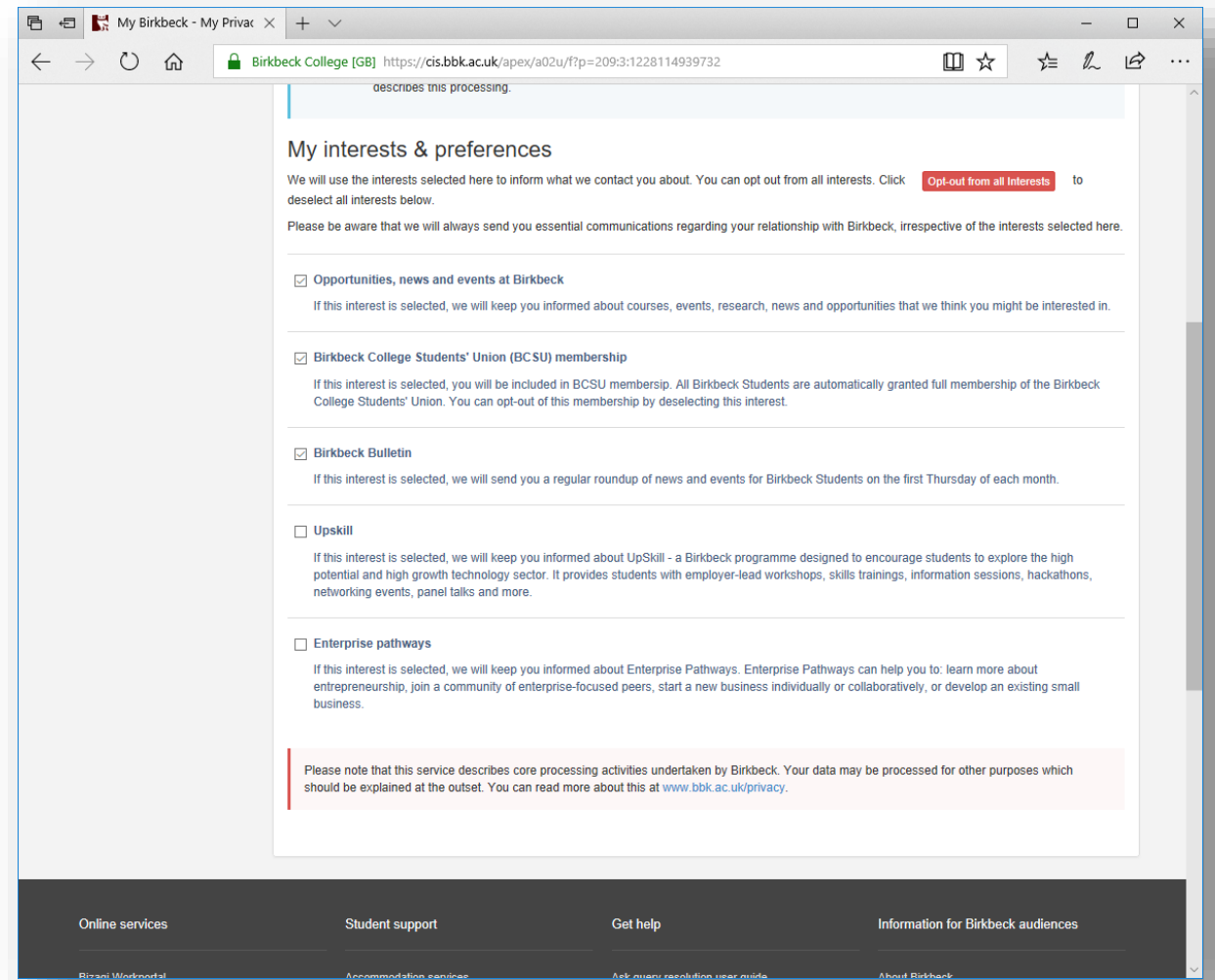
## Example: Open Evening Booking



# MY PRIVACY CONTROL (4)

## Example: Applicant or student

- Sees 'Admissions and Study'
- Has a different set of 'interests' to pick from (based on rules)



# ATTRIBUTIONS

- Firework Video Free Stock Videos by Videezy! [www.videezy.com](http://www.videezy.com)
- Champagne Bottle Vectors by Vecteezy [www.vecteezy.com/free-vector/champagne-bottle](http://www.vecteezy.com/free-vector/champagne-bottle)
- Animal Party Hat Vectors by Vecteezy [www.vecteezy.com/free-vector/animal-party-hat](http://www.vecteezy.com/free-vector/animal-party-hat)
- Magnifying Glass Vectors by Vecteezy [www.vecteezy.com/free-vector/magnifying-glass](http://www.vecteezy.com/free-vector/magnifying-glass)
- Tool Vectors by Vecteezy [www.vecteezy.com/free-vector/tool](http://www.vecteezy.com/free-vector/tool)