Privacy notice template (GDPR compliance from 25/May/2018)

This template can be used as a basis for the privacy and cookies notices that are required on all our websites. This includes but is not limited to the following:

* University websites – this is any website branded as the University
* Any website within leeds.ac.uk or on University networks
* Any website where the University may be considered a data controller or data processor
* Any website where the University has some interest – this includes joint project sites and sites controlled or maintained by the University regardless of where they are hosted

The requirement that all websites have their own privacy notice was put in place several years ago. However, in order to comply with the GDPR all websites must now have the following:

* A clear link marked ‘Privacy and Cookies’ linking to a specifically written privacy notice
* A revised privacy notice based on the template below
* A cookie popup that indicates that cookies are being set
* A mechanism by where cookies can be declined

The University has two standard web platforms; Jadu, and our managed Wordpress. In each case code to implement the cookie popup along with assistance in actually implementing it is available on request to IT via the IT Service Desk. For any other hosting the popup code is available but you will need to make your own arrangements to implement it. Websites operated by or for the University should have maintenance contracts and therefore you should contact your supplier or designer.

In the following template text within square brackets […] indicates where you need to insert information or where you need to consider the relevant section, in particular for websites not hosted by IT, or sites that are partnerships and where the University is not the sole data controller. Please note that privacy notices are specific to a given website and so need to mention that website where indicated below – thus you cannot simply link to the notice on www.leeds.ac.uk.

**PRIVACY AND COOKIES NOTICE TEMPLATE**

Privacy and cookies

Privacy notice for [**[Put**](http://www.leeds.ac.uk/) **your website URL here**]

This privacy notice has been updated in line with the General Data Protection Regulation. You can manage your cookie settings here. [**link to your cookie popup or other cookie management function**]

**1. Purpose of this Notice**

This Notice tells you how the University of Leeds (University) [**add any other organisation here. For example if your website is hosted externally or if data is collected for us by an external organisation those details must be included here] will collect and use your personal data when you access this website. The University [see above regarding joint collection**] is a “controller” of this personal data for the purposes of the data protection legislation.
Note that additional information will be provided where you are requested to enter personal information and this will vary between our various websites.  (Information will be provided through the relevant privacy notice for that website).

It is important that you read this Notice together with any other privacy notice we provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.  This Notice supplements the other notices and is not intended to override them.

**2. Changes to this Notice**

We keep the information provided in this Notice under review. This Notice may be updated from time to time. If we make any substantial updates, we will draw these to your attention.

We will not use your personal data in any manner that is incompatible with the purpose for which the data were collected originally, unless we have obtained your consent to that additional use.

**3. Anything you are not clear about**

If there is anything you are unclear about, please contact our Data Protection Officer, who shall be happy to answer any queries you may have concerning this Notice or the way in which we process your personal data.
The Data Protection Officer's contact details are provided at the end of this Notice.

**4. Purpose of processing your data**

Where we request personal data from you on our website you will be informed at that time of the purpose for which the data will be processed and how it will be processed, its legal basis for processing as well as any transfers to third parties.

**5. Purpose of processing - automated collection of personal information**

When you access our web pages certain information your browser provides, including your IP address at the time, browser type, and potentially the address of the page you last visited, will be automatically recorded by the University [if externally hosted add details here of any collection carried out by the hosting provider]. This data may be used to aid detection in the event of a security breach. The legal basis for this processing is necessity to pursue our legitimate interests to keep our website secure. The University [**if externally hosted add details here of any collection carried out by the hosting provider**] retains this data in a form from which you may be identifiable for a period of up to one month.

**6. Third-party access**

Your personal data that you have provided will not routinely be sent to third parties (unless notified - see 4. above).

[**Add here any specific data transfers that are in place if you do not do so at the point of collection. For example, if the whole website transfers data (e.g. a survey form) it is worth setting this information out here**]

**7. Data retention**

The University’s policies on retaining data for prospective and current students, staff and job applicants are detailed in our [data retention policy](http://www.leeds.ac.uk/secretariat/documents/retention_policies.pdf). http://www.leeds.ac.uk/secretariat/documents/retention\_policies.pdf

In other cases, for example, if you subscribe to news or events, any retention of data will be made clear at the point of collection.

[**If hosting offsite or if this is for a partner organisation you will need to find out what data retention policies are in place**]

**8. Cookies**

Manage your cookies [**link to your cookie pop-up or management page**]

Cookies are small text files that are placed on your device by websites that you visit.

We use cookies for the following purposes:

* Essential: To help our website function
* Performance tracking: Track how our website is used and help us make improvements
* Marketing: To inform targeted advertising.

**[Refer to example cookie tables. You will also need to include any cookies which your website sets and for which there is not already an example to copy]**

**Third party cookies and tracking**

If you share content from our website through other websites, for example Facebook or Twitter, cookies or a form of tracking may be used by these services and you need to manage your privacy via your account (and not through our site).

**Manage your cookies and privacy**

You can opt out of non-essential cookies - [manage your cookie settings here](http://www.leeds.ac.uk/info/5000/about/237/privacy_notice).
You can also manage your privacy settings, including cookies, through your browser settings.

Further information about cookies can be found on the [Information Commissioner's Office website](https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies).

**9. Your duty to inform us of changes**

It is important that the personal data the University holds about you is accurate and current. Please keep us informed if the personal data you have provided to us needs to be updated.

[Contact us](http://www.leeds.ac.uk/info/5000/about/196/contact_us) [**link to http://www.leeds.ac.uk/info/5000/about/196/contact\_us**]

**10. Your rights as a data subject**

Under the GDPR, in certain circumstances, you have the right to:

* withdraw your consent to our processing of your personal data where that is the legal basis for such processing
* access any of your personal data which we hold
* have your personal data which we hold corrected if it is inaccurate
* have any of your personal data which we hold erased
* restrict the ways in which we process your personal data
* object to our processing of your personal data
* receive a copy of any of your personal data which we hold in a structured and commonly used machine-readable format
* in certain cases not be subject to a decision based solely on automated decision making
* lodge a complaint with a supervisory authority

**11. Queries and complaints**

If you have any queries or concerns relating to this privacy notice or the way your data is being processed through this website then please contact the University’s Data Protection Officer, Alice Temple on dpo@leeds.ac.uk or by post to University of Leeds, 11.72 EC Stoner Building, Leeds LS2 9JT, UK.
The University’s main telephone number is +44 (0) 113 2431751.

The UK’s regulator for the DPA and GDPR is the Information Commissioner’s Office (ICO). The University is registered as a Data Controller with the ICO

Should you be dissatisfied with our handling of your concerns you have the right to complain to a supervisory authority. In the case of the UK this is the Information Commissioner’s Office and details can be found at [https://ico.org.uk.](https://ico.org.uk/)

**EXAMPLE COOKIE TABLES**

Please note the following are only examples. In some cases they may be directly relevant to your website and may be copied, but the tables are not complete sets. You must ensure that all cookies in use by your website are declared. However, as the requirement to declare all cookies was set some years ago you may find that your existing cookie table meets our requirements.

**Essential cookie examples:**

Websites hosted behind the NetScaler (for example all Jadu websites):

|  |  |
| --- | --- |
| NSC\* | **Purpose**These cookies are set by our Citrix NetScaler appliance and are used to ensure your browsing session remains on the same web server. It is deleted when you close your browser. |
|  | **Information**[www.citrix.com](http://www.citrix.com/)  |

PHP drive websites:

|  |  |
| --- | --- |
| PHPSESSID | **Purpose**This cookie stores a unique ID assigned by the web server. It is used to enable some site functionality to work properly. It is deleted when you close your browser |
|  | **Information**[www.php.net/manual/en/intro.session.php](http://www.php.net/manual/en/intro.session.php)  |

Websites using the IT-provided cookie popup:

|  |  |
| --- | --- |
| disallow\_google | **Purpose**Cookie assigned to remember your cookie preferences for performance and analytics components. Contains a simple yes or no. |
|  | **Information**Persistent cookie. Expires after 12 months. |
| disallow\_facebook | **Purpose**Cookie assigned to remember your cookie preferences for third-party social media components. Contains a simple yes or no. |
|  | **Information**Persistent cookie. Expires after 12 months. |
| cookieconsent\_status | **Purpose****Determined whether or not the cookie popup has been accepted.** |
|  | **Information**Persistent cookie. Expires after 12 months. |

**Performance and advertising cookie examples**

**Google Analytics**

|  |  |
| --- | --- |
| \_\_utma\_\_utmb\_\_utmc\_\_utmv\_\_utmz\_\_ga\_\_gat\_\_nid | **Purpose**These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the site.These cookies are also used to track users’ interests and then provide targeted advertising on other websites. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. |
| **More information**Google privacy policy [link to https://policies.google.com/privacy?hl=en-GB&gl=uk]Google analytics [link to https://support.google.com/analytics/answer/6004245]Google analytics terms of service [link to https://www.google.com/analytics/terms/gb.html]Google tag manager terms of service [link to https://www.google.com/analytics/tag-manager/use-policy/]Universal Analytics opt-out browser add-on [link to https://tools.google.com/dlpage/gaoptout] |