

## **Introduction**

GALENOS is committed to protecting your privacy and security as well as being transparent about how we store, use and share your information. We respect your privacy and are committed to protecting your personal data.

GALENOS is a consortium, made up of a number of independent partners, led by the University of Oxford and funded by the Wellcome Trust.

This Privacy Notice lets you know how we look after your personal data and tell you about your rights and how the law protects you.

The University of Oxford and the Wellcome Trust are the joint Data Controllers. This means they are jointly responsible for the management and processing of your personal information gathered through GALENOS.

You can read more detail about both organisations privacy policies, including how they will handle your data here:

[Oxford University's policy on Data Protection](#)

[Wellcome Trust Privacy Policy](#)

## **General website Privacy Policy**

This policy (together with our [terms of use](#) and any other documents referred to in it) describes how we collect and use your personal data during your use of the GALENOS website ([www.galenos.org.uk](http://www.galenos.org.uk)) (the 'website') in accordance with the General Data Protection Regulation (GDPR) and related UK data protection legislation.

### **A) Who is using your personal data?**

The University of Oxford<sup>1</sup> and the Wellcome Trust are the "data controllers" for the information that we collect when you visit the 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 the website, and the maintenance of the GALENOS Crowd. It will also be shared with the third parties described in [Section E](#).

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.

### **B) 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, deletion or retention.

### **C) Types of data we collect about you**

We will automatically collect, store, and use the following categories of data when you browse and search our site, if you have consented to our use of cookies:

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.

Should you wish to join GALENOS Crowd, or if you submit an expression of interest to GALENOS, we will collect personal data including your name and email address. Your data will be used on the basis of legitimate interest.

It is important to remember to only submit any personal data which you are happy to have processed in this way.

### **D) How we use your data**

We process your data for purposes arising from your use of the 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 in operating and improving the website, analysing its use, and ensuring its security.

For the GALENOS Crowd we will use your data to determine your eligibility and to provide you with future communications that we believe may be of interest to you.

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.

### **E) Sharing your data with third parties**

We may share your data with third parties who provide services on our behalf, such as those who help us to operate the website. All our 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.

### **F) Where we store or use your data**

We may store data collected by the website manually or electronically. The data is stored on our secure servers and/or in our premises within the UK.

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.

### **G) Third party websites**

Our site contains links to and from various third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **H) 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.

### **I) 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 under certain circumstances, for example, if you consider that 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. Further information on your rights is available from the [Information Commissioner's Office](#) (ICO).

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](mailto:data.protection@admin.ox.ac.uk) or [dataprotection@wellcome.org](mailto:dataprotection@wellcome.org). 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 ICO at <https://ico.org.uk/concerns/>.

#### **J) 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](#).

#### **K) 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.

#### **L) Contact**

If you wish to raise any queries or concerns about this privacy policy please contact the Information Compliance Team by email at [data.protection@admin.ox.ac.uk](mailto:data.protection@admin.ox.ac.uk) or by post at University of Oxford, University Offices, Wellington Square, Oxford, OX1 2JD.

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