## Privacy policy - Lest We Forget

https://lwf.web.ox.ac.uk/home ("Lest We Forget") and <a href="http://lwf.it.ox.ac.uk/s/lest-we-forget/page/welcome">https://lwf.it.ox.ac.uk/s/lest-we-forget/page/welcome</a> ["Lest We Forget: Submission Site" are operated by the University of Oxford. We are committed to protecting the privacy and security of your personal information ('personal data').

This policy (together with our terms and conditions) describes how we collect and use your personal data during your use of our site, in accordance with the General Data Protection Regulation (GDPR).

# A Who is using your personal data?

The University of Oxford<sup>1</sup> 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 Lest We Forget Project (the Lest We Forget Team). 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.

When you submit material to the Lest We Forget project you are accepting and consenting to the practices described in this policy.

#### **B** Glossary

Where we refer in this policy to your 'personal data', we mean any recorded information that is about <u>you</u> and from which you can be identified. It does not include information contained in the 'story' part of the submission (e.g. the person associated with the objects from 1914-1918).

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.

<sup>&</sup>lt;sup>1</sup> The University's legal title is the Chancellor, Masters and Scholars of the University of Oxford

## C Types of data we collect about you

When you submit material to us for the collection will collect, store, and use the following categories of data:

**Data you give us.** You may give us data about you including:

Your name, your contact details [address, email], the data about the objects and story you
are submitting to the archive.

# D When we collect your data

We will collect the data about you only when you choose to give it by submitting an item to the collection.

# E How we use your data

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

- To allow us to keep a secure record of who has submitted material for future reference;
- To display to end users who search the collection they will be able to see the data you have entered into the story section, the dates and location of the objects (e.g. Ypres, 1915), the digitised objects themselves (e.g. photographs), and your name (unless you choose to remain anonymous). They will not be able to see your contact details.
- To preserve the data. We will store all the data you give us on secure servers under the control of Oxford University. We will also send a copy of the data to the Europeana project under a licence of CC-BY-NC.

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.

# F Marketing

We would like to send you information by email about the project and the eventual launch of the final archive.

We will <u>not</u> provide your data to other businesses so they can use it for marketing purposes.

We will <u>not</u> provide your data to journalists or researchers but we may contact you for your permission for you to be put in touch with them.

# G Sharing your data with third parties

We will share your data with non-commercial third parties who actively support the study of World War One. All our third-party service providers are required to take appropriate security measures to protect your data in line with our policies. We permit them to process your data only for specified purposes and in accordance with our instructions. In particular we may share your data with Europeana project, the Commonwealth War Graves Commission, the Imperial War Museum, and other national archives to allow them to further preserve the data and increase cross-searching of material.

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

#### H 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.

There may be occasions when we transfer your data outside the European Economic Area (EEA), for example, when requested by an international World War One research project. 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.

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.

#### I 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.

#### J 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. [You also have the right to object where we are processing your data for direct marketing purposes.]
- 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 ww1collections@it.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 <u>Information Compliance Team</u> 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/.

#### K Cookies

Our site does use cookies. These are simply to assist users who submit more than one contribution to the site and are not used for any other purposes.

# L 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.

## M Contact

If you wish to raise any queries or concerns about this privacy policy please contact us at ww1collections@it.ox.ac.uk.