

## Human Anatomy Unit Privacy Notice

### What is the purpose of this document?

This page provides information about how Imperial College London ("Imperial", "we", "our", or "us") processes data collected through the London Anatomy Office.

The university is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

We will generally use your personal information to provide you with the services, products, or information you have requested from us. We may need to share your information with our service providers for these purposes, but we will ensure that appropriate contracts with these parties are in place, and they only process your information in accordance with our instructions and data protection legislation. If we need to transfer any information to a country not recognised as providing equivalent protection, we will use additional safeguards approved by UK or EU regulators.

It is important that you read this notice, together with any other privacy notice that we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

### The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are also "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Relationship details
- Gender
- Marital status
- Next of kin and emergency contact information.
- Employment

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Religious beliefs

- Information about your health, including any medical condition and health records

### **How is your personal information collected?**

We collect the personal information about you when you complete a 'Donation of a body for anatomical examination' consent form<sup>1</sup> and provide it to the Donations Coordinators at the London Anatomy Office, based at Kings College London. We may also collect additional information as and when you engage with the department or through the teams engagement with other named parties, including the donator, witness(es), legal representative, guardian, GP etc.

### **How we will use information about you and the legal basis for processing your data under the GDPR**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

Where we need to comply with a legal obligation\*.

Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us\*\*.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests\*\*\*.

Where you have consented to the processing\*\*\*\*.

### **Situations in which we will use your personal information**

We need all the categories of information in the list above (see The kind of information we hold about you) primarily to manage the consent form which you provide to us\*\*\*\*, where you ask us to do something on your behalf\*\*\*\* or where the university is required to manage a process or procedure as part of its public\*\* or legal functions\*. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties\*\*\*, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below. We have indicated by asterisks the purpose or purposes for which we are processing or will process your personal information below

- To provide you with the information and services that you request from us\*\*\*\*.
- To ensure we meet any and all legal obligations, including Health and Safety plus the Human Tissue Act\*.
- To notify you [or your guarantor] about changes to our service.\*\*\*
- Making a decision about e.g. your recruitment or appointment.\*\*\*/\*
- To undertake activities and administrative tasks, including the transferring of information, which the London Anatomy Office and its partner schools are tasked to undertake\*\*.
- Dealing with legal disputes involving you, or other employees, workers and contractors\*/\*\*.

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<sup>1</sup> <https://www.kcl.ac.uk/lsm/assets/london-anatomy-office-booklet-2024.pdf>

- To conduct data analytics studies to review and better understand engagement with the department and its partner organisations\*\*/\*\*\*.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### **If you fail to provide personal information**

If you fail to provide certain information when requested, we will be unable to progress an application or consent form where you are named and may be unable to assist you with a request where your consent is necessary

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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

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### **How we use particularly sensitive personal information**

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

In limited circumstances, with your explicit written consent\*.

Where the processing is necessary for archiving purposes in the public interest, for historical, scientific, research or statistical purposes, subject to appropriate safeguards\*\*.

### **Our obligations**

We will use your particularly sensitive personal information in the following ways:

- We will use information about your health records, religious or moral beliefs (where you have specifically provided it), where its required and forms part of a specific study design.

### **Automated decision-making**

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

### **Data sharing**

We will have to share your data with third parties, including third-party service providers and other entities in the university group and relevant partner organisations. Please see <https://www.kcl.ac.uk/research/london-anatomy-office> for current list of partners.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU though if we do, you can expect a similar degree of protection in respect of your personal information.

### **Why might you share my personal information with third parties?**

We may share your personal information with third parties where required by law, where it is necessary to administer the relationship with you or where we have another legitimate interest in doing so, i.e. GPs, Funeral Directors etc.

### **How secure is my information with third-party service providers and other entities in our group?**

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

### **What about other third parties?**

We will share your personal information with partner organisations, for the purposes of undertaking activities within the London Anatomy Office.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

### **Data security**

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Data retention**

#### **How long will you use my information for?**

Unless stated otherwise, we will keep your information for as long as required under HTA legislation; following donor consent and local policy.

#### **Rights of access, correction, erasure, and restriction**

#### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### **Your rights in connection with personal information**

To find out more about how the university deals with your personal information, including your rights and who to contact if you have a concern, please contact us and we will be more than happy to answer your queries / requests.

### **Right to withdraw consent**

Consent can be withdrawn at any time prior to the donation being received by the college. Please notify the London Anatomy Office and the Human Anatomy Unit in writing.

London Anatomy Office

- [lao@kcl.ac.uk](mailto:lao@kcl.ac.uk)

Imperial College London, Human Anatomy Unit

- Rachael Waddington (Designated Individual), [r.waddington@imperial.ac.uk](mailto:r.waddington@imperial.ac.uk)
- Ruth Nicholson (Licence Holder), [r.nicholson@imperial.ac.uk](mailto:r.nicholson@imperial.ac.uk)

### **Data Protection Officer**

To contact us about our privacy notice or information we hold about you, please write to the university's Data Protection Officer, Robert J Scott:

- by email – [DPO@Imperial.ac.uk](mailto:DPO@Imperial.ac.uk)

If you do not feel we have dealt with your request appropriately, you can raise a concern to the [\*Information Commissioner's Office\*](#).

### **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.