

How to write a Privacy Notice

What is the purpose of this guidance?

This guidance explains what information needs to be included in a privacy notice and provides advice on how to write one, including templates that can be adapted by departments for their own purposes.

Who is this guidance for?

Departments that have to provide a privacy notice because they collect data directly from people.

What is a privacy notice?

Under the GDPR, when you collect someone's personal data, you must tell them what you intend to do with it. This information is usually called a privacy notice, but can be called other things, such as a privacy policy or data protection statement, or may have no specific label. It can be a free standing document or incorporated into a form used to collect information, such as an application or registration form.

The University has generic private notices that cover the more common purposes for which personal data is processed, namely, those for students, undergraduate applicants, postgraduate applicants, staff, online job applicants, alumni and donors, and the central website. These notices can be found here. [ADD LINK TO WEB COPY] However, if you are collecting data for research or non-standard purposes or from other groups, you will need to provide your own privacy notice.

Templates

There are two templates:

- Template 1 [ADD LINK] is for data collected from a website and is a free standing document
- Template 2 [ADD LINK] is to be included in an application/registration form or other document used to collect personal data

Guidance on how to use the templates is given in the table below. Additional templates/worked examples will be added to the [toolkit](#) in due course.

What information do you need to include in a privacy notice?

Information required	What you need to do	Is there standard wording in the templates?	Relevant heading in templates
Identity and contact details of the data controller	This will be the 'University of Oxford' (not the department that is collecting and using the data). However, the contact details can be those of the department.	Yes	Templates 1 & 2 – Contact
Contact details of the Data Protection Officer	Data.protection@admin.ox.ac.uk	Yes	Templates 1 & 2 – Your rights
Purposes of the processing	Explain why are you collecting the data and what will you do with it	Partially - Exact detail will depend on individual circumstances	Templates 1 & 2 – How we use your data
Legal basis for the processing	You need a legally acceptable reason to collect and use personal data. There are six possible reasons. Those you are relying on need to be identified. For further information, please see the separate guidance on the legal basis for processing .	Partially - Exact detail will depend on individual circumstances	Templates 1 & 2 – How we use your data

Information required	What you need to do	Is there standard wording in the templates?	Relevant heading in templates
Legitimate interests (if legal basis)	If you are processing personal data on the basis of your legitimate interests (or those of third parties), you need to say what these interests are. For further information, please see the relevant section of the guidance on the legal basis for processing and the separate guidance on how to carry out a legitimate interests assessment (known as a LIA).	Partially - Exact detail will depend on individual circumstances	Templates 1 & 2 – How we use your data
Recipients or categories of recipients of the data	Name any organisations or categories of organisation with whom the data will be shared, and give a broad indication of who will have access to the data within the Department/University. Colleges count as third parties.	Partially - Standard wording available for internal sharing and sharing of data with third party service providers, but exact detail of any sharing with other types of third party will depend on individual circumstances	Template 1 – How we use your data (for internal recipients) and Sharing your data with third parties (for external recipients) Template 2 – Who has access to your data
Details of any transfers to countries outside European Economic Area and safeguards	Indicate whether the data will leave the EEA, and if so, under what circumstances (e.g. because you use a cloud based service provider such as SurveyMonkey or because you share the data with an overseas organisation engaged	Partially – Standard wording available for compliance with requirements on international transfers, including use of cloud-based service providers. Further	Templates 1 & 2– Where we store and use your data

Information required	What you need to do	Is there standard wording in the templates?	Relevant heading in templates
	in similar activities); and subject to what safeguards (e.g. the country is recognised by the EU as providing an adequate standard of data protection or the company has been certified under the EU US Privacy Shield). For further information, please refer to the separate guidance on international transfers .	detail will depend on individual circumstances	
Retention period or criteria used to determine retention period	Either indicate a specific retention period or the criteria used to determine how long you keep the data.	Partially – Standard wording for departments without specific retention schedule. Further detail will depend on individual circumstances	Templates 1 & 2 – Retaining your data
Rights of individuals to access data, rectify inaccurate data, erase data, object to processing, restrict processing; and right to data portability	Specify each right a person has under the GDPR and how to exercise them.	Yes – Departments can link to the data protection website where all rights will be specified.	Templates 1 and 2 – Your rights
Right to withdraw consent (if legal basis)	Explain individual's right to withdraw consent. This is only necessary where you are processing on the basis of consent. For further information,	Yes	Templates 1 & 2 – How we use your data

Information required	What you need to do	Is there standard wording in the templates?	Relevant heading in templates
	please refer to the separate guidance on the legal basis for processing .		
The existence of any automated decision-making or profiling	Seek advice from the Information Compliance Team if you think this may apply.	N/A	N/A