

## **Data Protection Policy** **E-lab Essay Competition**

### **How we use your personal information**

This statement explains how King's College Entrepreneurship Lab ("we" and "our") handles and uses information we collect from Essay Competition submissions, including information about the person submitting the essay ("you" and "your") and information about your teacher. In broad terms, we use the information to conduct the Competition and evaluate the successfulness of the Competition over time.

The controller for your personal data is King's College, King's Parade, Cambridge, CB2 1ST. The Data Protection Officer for the College is the Office of Intercollegiate Services Ltd (ISL), 64 Bridge Street, Cambridge CB2 1UR; 01223 768745; college.dpo@ois.cam.ac.uk . ISL should be contacted if you have any concerns about how the College is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement. The person within the College otherwise responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data, is the Freedom of Information Officer, foi@kings.cam.ac.uk.

### **Legal Basis for Processing**

When talking about data protection, 'processing' includes collecting, using, holding, sharing, publicising and even deleting any personal information. 'Personal information' means information from which a living person can be identified.

One legal basis for the College to process the essays and the contact details of the entrants and of their teachers, is that it is necessary for our legitimate interests and yours. Our interests are:

1. conducting the Essay Competition, and
2. achieving, and evaluating the Competition against, its stated aims (to encourage UK Sixth Form students to pursue entrepreneurial aspirations and understand better how to launch an enterprise, particularly among students who might not traditionally consider entering the world of business; we hope this competition encourages more young people, who might not think about it, to apply to Oxbridge and Higher Education).

To conduct the essay we need to confirm eligibility, select winning entries and award the prize to these winners. We evaluate your essay submission and share the winning essays with a broader audience; the reward of publicity helps us achieve our aims. We will retain your information for the periods stated below unless or until you request us to do otherwise.

You also have legitimate interests: gaining essay writing and research skills, building your CV, and receiving the opportunity to win one of the competition prizes.

The other legal basis for us to process your information is that personal data can be kept, or retained, for the historic record if it is of historic interest. The prizewinning essays, and the names and schools of those who wrote them, are of interest in the history of the College and they will be kept permanently in the College Archive.

### **Purpose of Processing**

We collect and process your personal information for the following purposes:

- A. Essays will be collected and held. All essays, which should not contain personally identifiable information, will be held in digital form for a period of 2 years. This is for the purposes of evaluating and judging them in order to select the prizewinners, considering complaints, for academic insights into the essays and for training purposes when it comes to marking and evaluating essays. The winning essays will be held within the College permanently, for archiving purposes, and may be shared externally.
- B. Your personal details will be held in a secure digital form for a period of 2 years. Such details include Name and any Google Account photo at the time you submit your essay, Date of Birth, Email Address, School name and address, School Year Group, and A-Level (or equivalent) subjects studied. This data is required to confirm eligibility for the prize, to contact prize winners, to judge the success of the Competition against its stated aims, to do statistical analysis of demographics of applicants in case we see evidence that we could improve the reach of the Competition in future, and to properly attribute essays to their designated author.
- C. The name and email address of the winners will be held within College indefinitely, in order to attribute authorship to the successful winning essays, retain contact in case of copyright enquiries (you retain copyright in your submission except that the College has permission to use winning essays for its own educational/non-commercial/promotional purposes), and for the historical record.

Although we may share your name and essay as described later in this paragraph, without asking your further permission, we only share other personal information with third parties on the winning entries, and only with your permission. Such third parties may include the wider media looking to promote the Competition. For non-winning entries, no personal information nor essays will be shared outside the Entrepreneurship Lab, except that shortlisted essays will be shared with our External Judges in order to select a winner (no personal data will be shared with the External Judges, except after winners have been selected).

Your teacher's name and contact details will be held in a secure digital form for a period of 2 years. This is for the purpose of confirming eligibility of entrants. This data will not be shared outside of the Entrepreneurship Lab except with the teacher's permission.

Where more than one of the retention periods stated above may be relevant we will apply the longer period where it is appropriate to the circumstances (for example, we will retain winning essays permanently, but will retain all the other essays we receive for two years only).

### **Your Rights**

You have the right: to ask us for a copy of the data we have on you, and to correct or delete it; to ask us to restrict processing (pending correction or deletion); to object to communications or direct marketing; and to ask for the transfer of your information electronically to a third party (data portability). Some of these rights are not automatic, but we will always try to explain why we might not comply with a request from you to exercise

them. If you ask to erase your information prior to us having judged all submissions then you will no longer remain in the Competition and forfeit your opportunity to win the prize.

You retain the right at all times to lodge a complaint about our management and processing of your personal information with the Information Commissioner's Office at <https://ico.org.uk/concerns/> .

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