

Moorfields BRC Privacy Policy

We are committed to protecting and respecting your privacy. This policy sets out the basis on which we will process any personal data that we collect from you, or that you provide to us. Please read the following carefully to understand our practices regarding your personal data.

We encourage you to read the whole notice. Alternatively, if you wish to read about specific privacy practices that interest you, please click on the relevant links below.

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1. Who we are

We are the National Institute of Health Research Biomedical Research Centre at Moorfields Eye Hospital NHS Foundation Trust and UCL Institute of Ophthalmology ('**Moorfields BRC**', '**us**', '**our**' or '**we**'). Of the twenty national Biomedical Research Centre in the United Kingdom, we are the only one dedicated to vision.

2. This privacy notice

This is our main privacy notice that applies to all of our activities. Please read this in conjunction with any additional privacy information that we provide to you. This notice may be updated from time to time. This version is dated 19 December 2018.

3. What is personal information?

Personal information is information that relates to you or allows us to identify you. This includes obvious things like your name, address and telephone number but can also include less obvious things like analysis of your use of our websites.

There are different types of personal information. Additional restrictions are placed on the use of the following types of information under data protection law:

- **- Special categories of personal information:** these include information about your health, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership, your genetic data and biometric data, and information concerning your sex life or sexual orientation; and
- **- Criminal convictions information:** this is information relating to your criminal convictions and offences.

4. Our responsibility to you

For the purposes of data protection law, both University College London (**UCL**) and Moorfields Eye Hospital NHS Foundation Trust (**Moorfields**) act as separate ‘controllers’ in respect of the personal information processed by Moorfields BRC.

This means that UCL and Moorfields are responsible for ensuring compliance with relevant data protection laws when your personal information is processed by Moorfields BRC.

5. Contacting us

Moorfields BRC

If you have any queries about the use of your personal data by Moorfields BRC, please contact us using the following details:

- **- By email:** moorfieldsbrc@nihr.ac.uk
- **- By telephone:** +44 (0)20 7608 6949
- **- In writing:** NIHR Moorfields BRC, 2/12 Wolfson Building, UCL Institute of Ophthalmology, 11-43 Bath Street, London, EC1V 9EL

You may also contact UCL and/or Moorfields using the details set out below.

UCL

You can contact UCL:

- **- By telephone:** +44 (0)20 7679 2000
- **- In writing:** University College London, Gower Street, London, WC1E 6BT

UCL has appointed a data protection officer to oversee data protection compliance. You can contact UCL’s data protection officer:

- **- By email:** data-protection@ucl.ac.uk
- **- In writing:** Data Protection Officer, University College London, Gower Street, London WC1E 6BT

Moorfields

You can contact Moorfields:

- **- In writing:** Moorfields Eye Hospital NHS Foundation Trust, 162 City Road, London, EC1V 2PD

Moorfields has also appointed a data protection officer to oversee data protection compliance. You can contact the Moorfields data protection officer:

- - **By email:** moorfields.ig@nhs.net
- - **By telephone:** +44(0)20 7253 3411
- - **In writing:** Data Protection Officer, Information Governance Department, Moorfields Eye Hospital NHS Foundation Trust, 162 City Road, London, EC1V 2PD

6. Why are we collecting personal information about you?

We only collect personal information about you in connection with the operation and activities of Moorfields BRC patient and public involvement or engagement in research for the purpose of influencing research direction or operations – but excluding participation in clinical trials.

We will hold information about you if:

- - You are a member of our Research Community (see below for further information on this);
- - You take part in our discussion groups or events, receive our updates, make enquires to or visit our offices or websites;
- - You provide services to us (or you represent a company which provides services to us);
- - You represent a regulator or government body which has dealings with us.

7. What personal information do we collect about you?

The types of information we process about you may include:

Types of Personal Information	Details
Individual details	Name, address, other contact details (e.g. email and telephone numbers)
Special categories of personal information	Information about your health, racial or ethnic origin (only where such information is relevant to prevalence of a health condition)
Identifiers	Information which can be traced back to you, such as an IP address, a website tracking code or electronic images of you

8. Where do we collect your personal information from?

We collect your personal information from various sources, including personal information provided to us directly by you, information provided by your employer or information that we collect about you (e.g. where you visit our website).

The source will depend on why we are collecting your personal information.

9. How do we use your personal information?

In this section we set out in more detail:

- - The main purposes for which we use your personal information; and
- - The legal bases upon which we are using your personal information.

Purpose	Legal Basis
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Research Community Data is stored on a secure database where members of the public (18 years and over) can register to be contacted about opportunities to be involved in research. To become a Research Community Contributor you must complete, sign and date our Research Community registration form and return it to us. Research Community registration forms are available directly from the Moorfields BRC team at our public facing events and in some instances via email or by post. The Research Community registration form collects the following information: • - Name; • - Email; • - Address; • - Telephone Number; and • - Eye Condition (self-reported). There is no required information in order to join the Research Community and you are free to provide whatever information you feel comfortable with. However, the more information you provide, the more we can inform our approaches to you about activities that are likely to be the most relevant/of interest to you. Contributors will be invited to take part in opportunities which include: • - Events on eye research; • - Contribution to the design and running of research studies; and • - Taking part in questionnaires relating to sight loss and vision research. Decisions to contact people are based on: • - Eye condition: in the majority of cases we wish to involve people with lived experience of a particular eye condition; • - Address: the decision to contact someone might be based in some instances on their location relevant to the location of the involvement event/activity; and • - Email: preferentially we will contact those who have given an email address over those who have provided a postal address only. Individuals have the right to ask us to remove their information from our system at any time and without giving a reason.	Consent Participation in our Research Community is based on your consent.
Discussion groups and events: general If you wish to attend our discussion groups or events, we ask you to provide us with a limited amount of information. We use this information in order to arrange your attendance at our seminars and events. Seminars and events: filming and photography	Legitimate interests We have a legitimate interest in arranging your attendance at our events.

For all events organised by us you will be asked to complete, sign and date a filming and photography release form on arrival or to bring a completed form with you on the day. The filming and photography release form collects the following information: • - Event/activity you are attending; • - Name; • - Address; • - Telephone Number; and • - Email. If you do not wish to have your image captured, then you do not need to sign a filming and photography release form and you do not need to give a reason. Instead you will be identified to those conducting filming and photography as not wanting your image to be captured. While we respect the right of each individual's privacy there may be some instances (e.g. background/group shots) where you may inadvertently appear. Should you feel that you are identifiable then you are invited to contact us and ask us to stop using the image. Public images may be captured for use in the following circumstances: • - Hospital/university annual report/brochures; • - Press and promotional material; • - Charity and fundraising events; • - Conference presentations and exhibitions; • - Training and educational purposes; • - NIHR Moorfields BRC online channels (such as website, Twitter, Vimeo etc.); and • - One-off use by external and/or partner organisations (such as MEH, UCL, NIHR, NHS etc.).	Consent For some images we may seek consent, on a use by use basis, when the image: • could be part of a broader, national activity (e.g. a photographic competition) • appears to be of someone under the age of 16 years • captures a sensitive, emotional or vulnerable person/incident • will be used in a context that could be perceived as being sensitive, emotional or vulnerable
Visitors to our websites We may collect information automatically about your computer, including where available your IP address, operating system and browser type, for system administration purposes.	Legitimate interests We have a legitimate

Most of our websites use a small number of non-intrusive cookies to help them work more efficiently and to provide us with information on how the website is being used. For further information on cookies, see our Cookies Policy below. We use information held about you to ensure that content from our site is presented in the most effective manner for you.	interest in providing to you the facilities on our websites that you have requested and in understanding how our websites are used and the relatively popularity of the content on our websites.
Responding to queries If you have requested information or assistance from us, we will contact you either by e-mail by post in response to your request.	Legitimate interests We have a legitimate interest in providing information and assistance to individuals who contact us.
Service providers We collect information about you in connection with your provision of services to us or your position as a representative of a provider of services to us.	Legitimate interests We have a legitimate interest in contacting and dealing with individuals involved in providing services to us.
Marketing We may contact you with updates and information on our activities which we think will be of interest to you.	Legitimate interests We have a legitimate interest in keeping you informed about seminars, events and developments that may be of interest to you.

	When we send you marketing communications, there are separate laws regarding market communications that we adhere to, in addition to data protection laws. You may opt out of receiving marketing communications from us at any time, and each communication we send provides a straightforward means of doing so.
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10. Consent

Where we do process your personal information based on your consent, you have the right to withdraw your consent at any time. To withdraw your consent please contact us using the contact details set out in [section 5](#) above.

In respect of update emails, please click on the unsubscribe link in the relevant email you receive from us.

Members of our Research Community may contact us using the contact details set out in [section 5](#) and ask to be removed from the Research Community at any time and without giving a reason.

It is possible to withdraw consent for us to use any image of you, at any time and without giving a reason. We will then delete the image from our library to prevent any further use. We may not be able to guarantee that in the future a different image of you may be used. However, it is again possible to withdraw consent for its use, at any time and without giving a reason.

- **- Electronic images:** the image will be removed from all platforms owned and operated by the Moorfields BRC and we will take responsibility for ensuring its removal from any platforms owned and operated by our partners; and
- **- Print images:** where possible we will withdraw the image from any further future circulation, but we may not be able to recall the image in instances where it has already been distributed as part of printed materials.

11. Do we share your information with anyone else?

We do not use your information for commercial gain. We do not disclose personal information about you to advertisers, or sell your information to any other organisation for marketing purposes.

We do share your information in the following circumstances:

- - Where we use external companies to organise or host events for us, we may need to provide these service providers with your relevant information; and
- - We share your personal information with other third parties, such as relevant regulators, where we are required to do so to comply with legal or regulatory requirements.

In each case where we share your information with one of our service providers, the service provider is required to keep it safe and secure. They are also not permitted to use your information for their own purposes.

Please note that there may be instances where a third party has copied/or linked to your image without our knowledge. You have the right to contact any third party you perceive as using your image without your consent and request that they discontinue such use. In such circumstances, you are also welcome to contact the Moorfields BRC and we will do what we can to assist, up to and including removing the content from our own platforms.

12. Keeping your personal information safe

We take security issues seriously. We implement appropriate steps to help maintain the security of our information systems and processes and prevent the accidental destruction, loss or unauthorised disclosure of the personal information we process.

13. Profiling and automated decision making

We do not use profiling (where an electronic system uses personal information to try and predict something about you) or automated decision making (where an electronic system uses personal information to make a decision about you without human intervention).

14. How long do we keep your personal information?

We keep your personal information for as long as is necessary for the purposes for which it was collected. We will delete your personal information where you request this, subject to compliance with any legal or regulatory requirements which oblige us to keep it for a longer period.

15. Cross border transfers of your personal information

While we do not directly transfer your personal data outside the European Economic Area we may services that do, specifically Google G Suite, Eventbrite and SurveyMonkey. Please visit the respective websites for more information relating to their EU data protection policies:

- - [Google G Suite](#)
- - [Eventbrite](#)
- - [SurveyMonkey](#)

If you would like further details of how your personal information is protected when transferred from one country to another then please contact us using the contact details set out in [section 5](#).

16. Your rights

Under certain conditions, you may have the right to require us to:

- - Provide you with further details on the use we make of your personal information;
- - Provide you with a copy of the personal information we hold about you;
- - Update any inaccuracies in the personal information we hold about you;
- - Delete any of your personal information that we no longer have a lawful ground to use;
- - Where processing is based on consent, stop that particular processing by withdrawing your consent;
- - Object to any processing based on our legitimate interests unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights;
- - Restrict how we use your personal information whilst a complaint is being investigated; or
- - Transfer your personal information to a third party in a standardised machine-readable format.

In certain circumstances, we may need to restrict your rights in order to safeguard the public interest (e.g. the prevention or detection of crime).

We are obliged to keep your personal information accurate and up to date. Please help us to do this by advising us of any changes to your personal information.

17. Your right to complain

If you are not satisfied with our use of your personal information or our response to any request by you to exercise your rights, or if you think that we have breached any relevant data protection laws, then you have the right to complain to the authority that supervises our processing of your personal information or, where you are based in the EU, the data protection authority in your country.

The UK data protection regulator, the Information Commissioner's Office (**ICO**), is our lead data protection supervisory authority. Details of the ICO can be found at <https://ico.org.uk>.