



## **London Anatomy Office Privacy Notice**

### **1. Introduction**

The London Anatomy Office supports the work of the Teachers of Anatomy Trust which is part of the University of London. We are registered as a controller with the Information Commissioner's Office [notification number is [Z5419651](#)] and have a Data Protection Officer, Suzie Mereweather who can be contacted via [data.protection@London.ac.uk](mailto:data.protection@London.ac.uk). You can find out more about us on our website at [London Anatomy Office | King's College London](#)

One of our responsibilities is to tell you about the different ways we collect and use your personal data. This statement provides details about these uses. In addition to this statement, you may be given further information about the uses of your personal data when you engage with us in certain other ways. It is important that you read this notice, and any other notice we provide you with when we collect or use personal data about you, so that you are aware of how and why we are using this information.

### **2. What information do we collect from you?**

We hold and process personal data about people who complete a 'Donation of a body for anatomical examination' consent form and people who engage with the London Anatomy Office. This could include special category data of a more sensitive nature.

The personal data we hold and use about you consists of:

- Contact details including name, title, addresses, telephone numbers and personal email addresses
- Date of birth
- Relationship details
- Marital status and dependants
- Next of kin and emergency contact information

We also collect and process personal data when you make a financial donation. The personal donation collected for this purpose consists of:

- Donor name
- Details of donation
- Ethical and reputational risk analysis details

If you make a donation, you have the option of deciding whether your name can be used on donor lists or other stewardship material and you have the ability to opt out of future communications.

We also collect personal data relating to events we hold, such as our annual Service of Thanksgiving. This personal data consists of images of attendees at events and a record of attendance.

We also collect, store and use 'special category' data of a more sensitive nature

- Religious beliefs
- Health and medical history

### 3. Why do we collect this information?

We collect and use your personal data in the following circumstances

#### **When we have your consent to use your personal data**

- Fundraising and managing donations
- Issuing invitations to events

#### **Where we need to comply with a legal obligation:**

- Meeting obligations under the Human Tissue Act 2004 and Health and Safety obligations,
- Dealing with legal disputes involving you, other employees, workers and contractors.

#### **Where it is needed to manage a process as part of our public task:**

- Undertaking activities and administrative tasks, including the transferring of information which the London Anatomy Office and its partner schools are tasked to undertake
- Conducting data analytics studies to review and better understand engagement with the department and its partner organisations

**Where it is in our legitimate interests, as well as your own.** These purposes will never override your personal interests, fundamental rights and freedoms in relation to your personal data:

- Contacting you in relation to your completed consent form
- Notifying you about changes to our service
- Making a decision about your acceptance and other similar matters
- Publicising events, including uploading a recording of our annual Service of Thanksgiving to Youtube
- Conducting data analytics to improve our services

#### **When we have your consent to process your personal data**

- Providing you with the information and services that you request from us
- Managing your completed consent form
- Making a decision about your acceptance and other matters

We collect and use “special category” data of a sensitive nature as described above. Wherever we use these types of data we are required by data protection law to have further justification for collecting, storing and using it. Our reasons for processing these special categories of personal data are:

#### **With your explicit written consent**

- We use information relating to religious beliefs to act in accordance with donors’ values

#### **Where it is needed to carry out our legal obligations in relation to social protection law**

- We use details of health and medical history to provide to our partners and service providers for reasons of public interest in the area of public health
- We use information relating to health and medical history to make decisions about your acceptance for reasons of public interest in the area of public health

#### **Where it is needed for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes**

- We use details of health and medical history for statistical analysis

## **4. What do we do with this information?**

We collect your data directly from you when you complete a 'Donation of a body for anatomical examination' consent form. We may also collect additional information when you engage with the London Anatomy Office or through the team's engagement with other named parties, including the donator, witness(es), legal representative, etc.

We only use your personal data for the purposes for which we collect 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.

If you don't provide us with certain personal data when requested, we will be unable to progress an application or consent form where you are named. If we ask for your consent to use your personal data, and you don't provide that consent, we will be unable to assist you with that particular request.

### **Do we need your consent?**

Although we do use your personal data with your consent in the ways shown in Section 3, once a donation has been received we often then process under a different legal basis. These are described above. This means that we may process your personal information without your knowledge or consent, for the reasons given above, where this is required or permitted by law.

The University processes personal data in accordance with data protection legislation and our own Data Protection Policy.

## **5. How do we ensure data is kept secure?**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed inappropriately. We limit access to your personal data 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.

## **6. How long do we keep your information?**

We keep your personal data in accordance with the University's retention schedules.

## **7. Who do we share your information with?**

We share your personal data with third parties where it is required by law, where it is necessary to manage our relationship with you or where we have a legitimate interest in doing so.

We share your personal data with third parties, including third party service providers and other entities in the university group and relevant partner organisations such as funeral directors and medical schools for the purposes

of undertaking activities as instructed by the London Anatomy Office. Please see <https://www.kcl.ac.uk/research/london-anatomy-office> for current list of partners.

We may also need to share your personal data with a regulator such as the Human Tissue Authority where it is needed to comply with the law.

Personal data relating to donations is managed on our behalf by the University of London.

## **8. What rights do you have in relation to the way we process your data?**

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

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

### **Your rights in relation to your personal data**

As an individual whose data we process (a data subject), you have certain rights in relation to the processing. You can find detailed information about [your rights as a data subject](#).

You have the right to:

- Withdraw your consent for us to process your personal data where we have relied on that consent as our basis for processing your data.
- Ask us to confirm that your personal data is being processed and to gain access (i.e. have a copy) of that data as well as to be provided with supplemental information about the processing.
- Request that we rectify any inaccuracies where the data we hold on you is inaccurate or incomplete.
- Have your data erased by us, although in certain circumstances we may not be able to do this. The circumstances where this applies can be found in the [guide to data subject rights information](#).
- Restrict the processing of your personal data in certain ways.
- Obtain your personal data for reuse.
- Object to certain processing of your personal data.

**Consent can be withdrawn at any time. Simply notify the London Anatomy Office in writing and your details will be removed from our database and your consent form destroyed.**

London Anatomy Office  
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Guy's Campus  
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020 7848 8042  
[lao@kcl.ac.uk](mailto:lao@kcl.ac.uk)

Our telephones are answered between 1000-1600 Monday to Friday. If you call between these hours and you hear the answerphone it may be that we are on the telephone so, please leave a message. If you call outside of these hours please leave a message and we will return your call at our earliest opportunity. We are not open weekends or bank holidays.

If you would like to exercise any other of your rights please look at the information available on the [data subject](#)

[rights webpage](#).

**Make a complaint**

If you have any concerns about the way that we handle your personal data please [email the Data Protection team](#) as we would like to have the opportunity to resolve your concerns.

If you're still unhappy, you have the right to [complain to the Information Commissioner's Office](#)