



Data Privacy Notice Trinity College London- Ethicspoint Site

Trinity College London (“Trinity”) is a registered charity with registration numbers 1014792 (England and Wales) and SC049143 (Scotland) and company registration number 02683033 in England. Its registered office is at 7th Floor, 22 Upper Ground, London SE1 9PD.

The data privacy regulations of some countries require that a person making a report containing personal data must be notified of certain collection and retention practices regarding the information submitted by that person to this service.

If you do not wish to accept the terms below, we may be unable to accept any information via this system and suggest that you report this matter directly to your manager if you are an employee or worker or otherwise to a representative of Trinity’s People & Culture team, the Chief Legal Officer or the Executive Director, Quality and Standards, depending on the nature of the possible violation.

1. General

This service is a web-and phone-based intake system provided by Trinity to its employees, workers, contractors, vendors, suppliers, business partners and employees of its vendors, suppliers and business partners and to any users who wish to report an incident, (“Reporters”) for reporting suspected violations of laws, regulations, company policies or procedures or for certain matters specified under any applicable whistleblowing law under English law including protected disclosures under the Public Disclosure Act 1998.

Trinity’s Whistleblowing Policy applicable to employees, workers and contractors is available [here](#).

If Trinity employees or workers have complaints or grievances about their own employment or work situation, they should normally raise any grievances under the Trinity Grievance Policy and Procedure. Such matters should normally be reported directly to your manager, an ELT member or a representative of the People & Culture team, the Chief Legal Officer or the Executive Director, Quality and Standards.

Trinity is the controller of the processing of your personal information, and NAVEX is a processor acting on behalf of Trinity.

You may contact Trinity with any questions relating to this Notice or this service by contacting legal@trinitycollege.com.

2. Use of this service

Use of this service is entirely voluntary. You are encouraged to report possible violations directly to your manager, or to a representative of the People & Culture team or to the Chief Legal Officer or Executive Director, Quality & Standards at Trinity, depending on the nature of the possible violation. If you feel that you are unable to do so, you may use this service to make your report.

The service is a confidential online reporting system that allows you to report suspected violations of law or company policies, as well as other concerns you may have, to Trinity.



Please be aware that the information you supply about yourself, your colleagues or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe to be true. You will not be subject to retaliation from Trinity for any report of a suspected breach that is made in good faith, even if it later turns out to be factually incorrect.

Please be aware, however, that knowingly providing false or misleading information will not be tolerated. The information that you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively. We encourage you to identify yourself in order for us to follow up with questions that we may have.

3. What personal data and information is collected and processed?

This service captures the following personal data and information that you provide when you make a report: (i) your name and contact details (unless you report anonymously) and whether you are employed by the company; (ii) the name and other personal data of the persons you name in your report if you provide such information (i.e. description of functions and contact details); and (iii) a description of the alleged misconduct or incident as well as a description of the circumstances of the incident and (iv) any additional personal information you may provide in relation to the incident. If the personal information you provide contains special category data, such as health, religious or ethnicity information this will be subject to a higher level of protection as described in Trinity's Privacy Statement.

Note that if under the laws of the country in which you are residing, the report may not be made anonymously you will be required to provide your name and contact details however, your personal information will be treated confidentially and will only be disclosed as set out below

4. How will the personal data and information be processed after your report and who may access personal data and information?

The purpose for which your personal data, and your report, will be used will be to investigate the issues raised in your report and to take appropriate follow-up action, in accordance with applicable laws.

The personal data and information that you provide will be stored in a database which is located on servers hosted and operated by NAVEX in the European Economic Area . NAVEX has entered into contractual commitments with Trinity to secure the information that you provide in accordance with applicable law. NAVEX is committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement.

You may contact Trinity with any requests relating to the use, transfer, correction, or deletion of any of your personal data stored by this service.

For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information that you provide may be accessed, processed and

used by the relevant personnel of Trinity, Trinity's external advisers (e.g. legal advisers) or, in limited circumstances, by technical staff at NAVEX. Those individuals may be located in the United States, the United Kingdom or elsewhere. Where such individuals are located in countries that may not have adequate protection for your personal information Trinity will ensure that appropriate transfer mechanisms are put in place as required under the relevant data protection laws and take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards designed to protect your personal information. Personal data and information that you provide may also be disclosed to the police and/or other enforcement or regulatory authorities.

5. Accessing information concerning the report

Trinity will promptly notify any person who is the subject of a report that the report has been made to this service except where such notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information. This will be determined by Trinity on a case-by-case basis.

With some exceptions, the subject of the report may access information concerning the report (with the exception of the identity of the reporter) and request correction of personal data that is inaccurate or incomplete in accordance with applicable law. Similarly, with some exceptions, reporters may also access information about the report and request corrections of their personal data in accordance with applicable law

6. Retention of the Report and of Your Data

Your report and your personal data will only be retained for as long as they are needed for the investigation of your allegations, for any legitimate follow-up to the investigation, or such period as may be specified in our Data Retention Schedule or as required by local law. They will be fully and securely destroyed or erased when and as soon as they are no longer needed for the investigation of the report, or for the purposes of legitimate follow-up to the report (including legal action). However, reports and files on the investigation of reports (or parts of such reports or files) and personal data in such reports or files may be placed in an archive if there is a clear and overriding public interest or legal interest of your company in retaining the data, subject to such restrictions on access to the data aimed at safeguarding the rights and freedoms of the data subjects as may be allowed by applicable law.

7. Your Rights

Trinity will fully support you in exercise of any rights you may have as a data subject under applicable law, i.e. your:

- right of access to your data;
- right to rectification of incorrect data;
- right to erasure of data ("right to be forgotten");
- right to ask for restriction ("blocking") of contested data;

- right to have third parties who received incorrect, incomplete, or contested data informed of any rectifications or blocking of your data unless this proves impossible or involves disproportionate effort;
- right to data portability;
- right to object to processing;
- right not to be subject to automated decision-making including profiling (in fact, we will not use your data or any information in your report for such decision-making).

The above rights may be restricted if and to the extent that it is necessary and proportionate in order to safeguard any of the major public interests recognised in applicable law such as the protection of criminal investigations or public security, or to protect the fundamental rights and freedoms of others, including any person(s) incriminated in your report in accordance with applicable laws.

In addition to the rights listed above, you may also have the right to lodge a complaint about our processing of your personal data with the authority competent for supervising the processing of personal data (often referred to as the data protection authority) In the UK this is the ICO on 00 44 (0)303 123 1113.

8. Transfers of Personal Data

Your report and your details may be held on the secure servers hosted by NAVEX; may be transferred to NAVEX sub-processors outside your location for service and support or translation and interpretation purposes; and may be passed on to the servers of Trinity, subject to appropriate safeguards and transfer mechanisms to protect your personal data as required under applicable data protection laws.

9. Special Country Regulations

Some countries restrict reports such that only employees in key or management functions may be the subject of a report. In some countries, anonymous reports may not be permitted under the law except under extremely restrictive circumstances.

Further, any issues or concerns relating to topics not in scope to be reported via this service for a particular country or jurisdiction should be reported directly to your manager or ELT Member or a member of the People & Culture team if you are an employee; or the Chief Legal Officer or Executive Director, Quality & Standards as appropriate. You can find further information on how we deal with concerns relating to academic malpractice or complaints about our products and services [here](#).

10. Trinity's Privacy Statement

For information on how Trinity processes your personal information and how you may exercise your rights please see Trinity's Privacy Statement, Data Privacy Policy and Data Retention Policy [here](#), and where applicable, any Trinity Privacy Notice which has been communicated to you.

