



# Wellcome Privacy Statement

Wellcome is committed to safeguarding your personal information in accordance with data protection law. This Statement explains how, and on what legal basis, we collect, store, and use personal information about you as: a visitor to Wellcome Collection, our offices and our websites, a participant in any of our events, an applicant for a job at Wellcome, a lender or donor to, or recipient of loan items from, Wellcome Collection, or when you otherwise choose to interact with us. It also explains how we use personal information in Wellcome Collection for the purpose of archiving in the public interest.

Information on how we collect, store and use personal information in connection with grant-making is set out in our [Wellcome Grants Privacy Statement](#).

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information where we have your consent, where we need to perform the contract we have entered into with you, where we need to comply with a legal obligation or where it is necessary for our legitimate interests (or those of a third-party) and your interests and fundamental rights do not override those interests. Where our collections in Wellcome Collection contain personal information, we collect and use this information for archiving purposes in the public interest.

It is important that you read this Statement, together with any other privacy statement we may provide on specific occasions when we are collecting or using personal information about you, so that you are aware of how and why we are using your information. We may make changes to this Statement so please check from time to time for any updates.

For ease of reference, we have organised this Statement into the following click-through sections:

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# Wellcome Privacy Statement

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Information on how we collect, store and use personal information in connection with Wellcome's grant-making activities is set out in our [Wellcome Grants Privacy Statement](#).

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information where we have your consent, where we need to perform the contract we have entered into with you, where we need to comply with a legal obligation or where it is necessary for our legitimate interests (or those of a third-party) and your interests and fundamental rights do not override those interests. Where our collections in Wellcome Collection contain personal information, we collect and use this information for archiving purposes in the public interest.

It is important that you read this Statement, together with any other privacy statement we may provide on specific occasions when we are collecting or using personal information about you, so that you are aware of how and why we are using your information.

The Wellcome Trust Limited is a charitable company limited by guarantee incorporated in England and Wales (company number 2711000) (as trustee of the Wellcome Trust (a registered charity with number 210183)) ("**Wellcome**").

Wellcome is the "data controller" of your personal information. This means that we are responsible for deciding how we hold and use personal information about you.

If you wish to contact us in relation to this Statement, you can do so by contacting our Data Protection Officer using the following details:

Data Protection Officer  
Wellcome Trust  
215 Euston Road  
London NW1 2BE  
United Kingdom  
[dataprotection@wellcome.ac.uk](mailto:dataprotection@wellcome.ac.uk).

Further information on data protection law can be found here: <https://ico.org.uk/for-the-public>

## 1. The information we hold about you, how we collect and use it and our legal basis for doing so

Your personal data, or personal information, is any information about you from which you can be identified directly or indirectly. This may be information you give to us or that we collect from you when you visit [Wellcome Collection](#), Wellcome's offices, one of our websites or when you contact us. We also look at how you and other visitors use our websites, to ensure that we can give the best experience possible; whether you're looking for more information on one of our exhibitions or interested in hearing about our funding activities. We also receive personal information from third parties who sell, donate or lend material to our collections within Wellcome Collection (see [Lending, selling or donating items to Wellcome Collection and making exhibition loan requests](#)).

The main reasons we collect your information are to carry out and perform our contract with you, comply with legal obligations and in some cases we may use your personal information to pursue legitimate interests of our own or those of third parties (provided your interests and fundamental rights do not override those interests). The information we collect is, and will, only be used for one of the purposes outlined in this Statement and where we have a valid legal basis for doing so.

The technical information we collect when you visit our websites is used for site administration and internal operations (i.e. troubleshooting, data analysis, testing, research, statistical and survey purposes). This enables us to improve our websites to ensure that content is presented in the most effective manner for you and for your device, to allow you to participate in interactive features of our services when you choose to do so, and as part of our efforts to keep our sites safe and secure.

#### **(a) Visiting Wellcome's Websites**

You may choose to give us certain information when:

- setting up an online account with us;
- registering for or enquiring about our activities, events and services;
- subscribing to our publications, newsletters and updates;
- participating in website testing and research activities;
- filling in surveys on our websites;
- participating in our online discussion groups;
- contacting us about booking an event space at Wellcome Collection; or
- contacting us for another purpose through our websites.

The information may include:

- title, forename and last name;
- contact phone number(s);
- email address(es);
- information about any access needs you might have (that you tell us about when you book to attend a ticketed event at Wellcome Collection);
- when you participate in website testing and research activities, we will collect your name, access needs, age, location, your areas of interest and description of your status (i.e. student).

Additionally, certain technical information relating to you and your device are collected automatically when you use one of our websites, such as your:

- **Internet log information:** We use third-party services to collect certain technical information from your device including standard internet log information such as Internet Protocol (IP) address, browser type and version, and page interaction information; and
- **Cookies:** When you visit our websites we use cookies to automatically collect information about how you use our sites. For more information on how we monitor your use of our websites, please see our Cookies statement (set out below).

We may collect this information from you:

- to register you for activities, events or services you have registered for;
- to send you publications, newsletters and updates you have opted in to receive;
- to respond to queries raised through our websites;
- to administer any online accounts you have with us;
- in the case of technical information collected when you use our sites, for site administration and internal operations (i.e. troubleshooting, data analysis, testing, research, statistical and survey purposes). This enables us to improve our sites to ensure content is presented in the

most effective manner for you and your device, and to ensure our sites are safe and secure; and

- to conduct surveys and website testing activities and process your response to any survey or website testing you participate in for research, evaluation and statistical purposes, and contact you to follow up on surveys and website testing completed on our websites.

Our full list of websites can be [found here](#).

Most commonly we use information we collect about you via our websites in pursuit of our legitimate interest of engaging and informing the public about Wellcome and its charitable aims. For further information on how we balance our legitimate interests with your rights as an individual please contact our [Data Protection Officer](#). Where you opt-in to subscribe to publications, newsletters and updates, your consent is the legal basis for our use of your information. You have the right to withdraw your consent at any time by using the 'unsubscribe' option in the emailed publications sent to you. Where you register for activities, events or services, we use your information to provide those activities, events or services to you.

### **(b) Applying for a Wellcome grant, acting as a participant, external reviewer or adviser**

You may choose to give us certain information about you in connection with Wellcome's grant-making activities (i.e. as a grant applicant, holder, participant, external adviser or reviewer). Information on the personal information we collect in connection with the grant making process, how we use this and our legal basis for doing so can be found in our [Wellcome Grants Privacy Statement](#).

### **(c) Applying for a Wellcome job**

You provide the following information to us when you apply for a job at Wellcome via our application system:

- forename, middle name and last name;
- email address;
- contact phone number;
- home address;
- CV information including your work experience, education history, volunteering experience and interests;
- information about your right to work in the UK;
- salary expectations;
- current notice period and planned periods of leave.

We may collect this information from you to:

- set up and administer your account on our application system;
- consider your application for a Wellcome job;
- check you are legally entitled to work in the UK.

**We use this information on the legal basis that** we are taking steps at your request (considering the information in your application) to enter into an employment contract with you. We use information about your right to work in the UK to meet our legal obligation of making sure our staff are legally entitled to work in the UK.

### **Diversity Monitoring Information**

You may choose to provide the following optional diversity monitoring information to us (on an anonymous basis) when you apply for a Wellcome job:

- the age bracket you are in;
- whether you identify as disabled;

- your gender identity;
- your ethnicity or background;
- your religion or strongly held belief.

Your name is not associated with this information and it is not linked to your job application. It is only used by Wellcome for equal opportunities monitoring and reporting purposes, both internally and externally.

#### **(d) Visiting Wellcome Collection**

We may collect the following information about you when you visit Wellcome Collection:

- when registering in person to use Wellcome Library: title, forename and last name, home address, phone number, email address, your areas of interest and description of your status (i.e. undergraduate student);
- when you enter Wellcome Library by scanning your library card, the system records the point at which you enter;
- when you opt-in to receive further information from us (i.e. publications, newsletters and updates);
- when you complete a survey in person or following a ticketed event or library visit, the following information is collected from you on an anonymous basis: name, email, ethnicity, gender, disability, age, location;
- when your photograph is taken or you are filmed at a Wellcome Collection event;
- CCTV footage collected in public areas of our premises (inside and out);
- in the event you receive first aid from us whilst in our premises, the following information: your full name, occupation or status (i.e. visitor or member of public), injury details, contact details (phone number, email or contact address), location and description of accident or incident.

We collect this information from you to:

- provide you with access to a Wellcome Collection service (i.e. membership to Wellcome Library);
- contact you by email to remind you about a Wellcome Collection event you have booked to attend or discuss particular access needs you have specified at the time of registering for an event;
- provide you with access to a Wellcome Collection event you have registered to attend;
- send you a feedback survey about a Wellcome Collection event you have attended;
- analyse and report on Wellcome Collection visitor surveys;
- with your consent, add you to our mailing list and send you email communications you have opted-in to receive (i.e. publications, newsletters and updates);
- showcase and promote Wellcome Collection events through photographs or film taken i.e. on our websites;
- using images captured on CCTV, assist with the detection and prevention of crime, ensure public and staff safety and enforce parking regulations on our premises;
- monitor your use of our information and communication systems to ensure compliance with our IT policies (most commonly in the Wellcome Library); and
- comply with our legal health and safety obligations (i.e. in connection with first aid and reporting certain health and safety incidents).

**We use this information on the legal basis that** we need to, to pursue our legitimate interest of engaging the public through Wellcome Collection's library, exhibition space and programme of activities and events. In connection with this, we evaluate Wellcome Collection events by obtaining visitor feedback in order to make improvements where we need to.

Where you opt-in to subscribe to publications, newsletters and updates, your consent is the legal basis for our use of your information. You have the right to withdraw your consent at any time by using the 'unsubscribe' option in the emailed publications sent to you.

Where you register for activities, events or services, we use your information to provide those activities, events or services to you.

We use information we collect via CCTV in pursuit of our legitimate interest of securing our premises and preventing and detecting crime.

For further information on how we balance our legitimate interests with your rights as an individual please contact our [Data Protection Officer](#).

**(e) Lending, selling or donating items to Wellcome Collection and making exhibition loan requests**

You provide the following information to us when you lend, sell or donate items to our collections within Wellcome Collection, or make an exhibition loan request:

- name and (where applicable) organisation name;
- contact phone number;
- email address;
- address;
- details of items loaned/donated.

We use this information for the purpose of administering the agreement between us and meeting our obligations under that agreement.

**(f) Visiting Wellcome's Offices**

You give us, and we collect, the following information about you when you visit our offices:

- to provide you with access to our premises: title, forename and last name, organisation name;
- CCTV footage collected in public areas of our premises (inside and out);
- in the event you receive first aid from us whilst at our offices, the following information: your full name, occupation or status (i.e. visitor or member of public), injury details, contact details (phone number, email or contact address), location and description of accident or incident.

We may collect this information from you to:

- issue you with a security pass and provide you with access to our office premises (i.e. where you are attending a meeting or event at our offices);
- using images captured on CCTV, assist with the detection and prevention of crime, ensure public and staff safety and enforce parking regulations on our premises; and
- comply with our legal health and safety obligations (i.e. in connection with first aid and reporting certain health and safety incidents).

**We use this information on the legal basis that** it is necessary to pursue our legitimate interest of ensuring the security of our premises. For further information on how we balance our legitimate interests with your rights as an individual please contact our [Data Protection Officer](#).

**(g) Attending conferences, meetings and forums organised by Wellcome**

You may provide the following information to us when you register or apply to attend, conferences, meetings and forums (and associated travel, as applicable) organised by Wellcome:

- name and (where applicable) organisation name;
- contact phone number;

- email address;
- address;
- photo and biography (for use in the event booklet, as applicable);
- dietary requirements;
- information about any access needs you might have;
- for visa applications: date of birth, nationality, passport name;
- for booking your travel to the event: passport name and number and gender.

We collect this information from you to:

- register you for the event you have applied to attend and where applicable, organise any travel and visa applications associated with the event;
- where we are organising your travel and you are travelling on Wellcome business, notifying our travel security service provider of your travel details so that we can track you whilst travelling and alert you of any security issues, so we can meet our health and safety obligations; and
- where you opt-in to receiving further information, sending you updates you have opted in to receive.

**We may share your information for this purpose** with various third parties we work with in connection with the events we organise. These include:

- the provider of our web-based event registration system to send out and administer event invites and registration forms;
- our travel management company (where Wellcome is also funding the travel associated with an event) to make travel arrangements, including sharing your details (name, date of birth, passport information, seating/meal preferences, mobility/accessibility information) with hotels and transportation companies;
- the event venue, for the purpose of them administering the event; and
- our travel security partner, for the purpose of sending you relevant travel alerts whilst travelling to/from a Wellcome event.

We use your information to book you into the event you have registered or applied to attend. We organise events in pursuit of our legitimate interest of enabling the exchange and sharing of expertise in fields related to health research. For further information on how we balance our legitimate interests with your rights as an individual please contact our [Data Protection Officer](#).

#### **(h) Contacting Wellcome over the phone, by email or social media**

You may give us certain information about you when you contact Wellcome over the phone, by email or by social media, such as your:

- title, forename and last name;
- company or institution name;
- contact phone number(s);
- contact email address(es).

We may collect this information from you:

- to provide you with access to the Wellcome colleague or service you are contacting us about;
- to handle your query or otherwise engage with you; and
- for training and monitoring purposes: we record all phone calls made to our main switchboard number.

**We use this information on the legal basis that** it is necessary to pursue our legitimate interest of answering your queries, engaging with you or improving how we do so in the future. For further information on how we balance our legitimate interests with your rights as an individual please contact our [Data Protection Officer](#).

#### **(i) Information provided to us by third-parties**

We also receive information about you from third-parties, in the following circumstances:

##### **(i) Wellcome events**

###### **Third party event organisers and ticketing provider**

We may receive your title, forename, surname, email address and any access needs you mention when booking, from companies that organise events in Wellcome Collection and from our third-party ticketing provider. We will only use the information we receive about you for one or more of the following purposes:

- provide you with access to our premises;
- contact you in relation to your booking of one of our events;
- administer a contract that we have entered into with you;
- where you have opted-in to hearing from us, send email updates about our latest exhibitions, research or other news; and
- where you have opted in to hearing from us about evaluation of an event, to contact you about this.

**We use this information on the legal basis** of fulfilling our contractual obligations to you, or on the basis that is necessary to pursue our legitimate interest of contacting you regarding an event you have booked. We evaluate Wellcome Collection events by obtaining visitor feedback in order to make improvements where we need to in pursuit of our legitimate interest of engaging with and informing the public about Wellcome and its charitable aims. For further information on how we balance our legitimate interests with your rights as an individual please contact our Data Protection Officer.

If you have opted-in to hearing from us, your consent is the legal basis for our use of your information. You have the right to withdraw your consent at any time by using the 'unsubscribe' option in the emailed publications sent to you.

##### **Other third parties**

We may receive your name and work email address from third parties we work with who recommend that you are added to our mailing list for other Wellcome events i.e. Wellcome Collection private viewings.

We may also collect information about you from public domain sources (i.e. websites, social media sites) including your name and work email address in order to invite you to Wellcome events.

We will only use your information for the purpose of inviting you to Wellcome events. You will have the option to unsubscribe from hearing from us in every email we send to you. We use your information for this purpose in pursuit of our legitimate interest of engaging and informing the public about Wellcome and its charitable aims. For further information on how we balance our legitimate interests with your rights as an individual please contact our [Data Protection Officer](#).

##### **(ii) Collections within Wellcome Collection**

We may receive personal information about you from those who donate, sell or lend material to Wellcome Collection, i.e. information about you contained in collections transferred to Wellcome Collection.

In line with Wellcome Collection's [Access Policy](#) and [procedures](#), we make this material available in our collections within Wellcome Collection on the legal basis that we are archiving in the public



interest. This may include “special categories” of sensitive personal information (in which case please see [How we use particularly sensitive information](#) below).

## **2. How we use particularly sensitive information**

"Special categories" of particularly sensitive personal information that we hold about you (i.e., health-related information) require higher levels of protection under data protection law. We need to have further justification for collecting, storing and using this type of personal information.

We collect the following types of “special category” personal information and use them for the purposes and on the basis set out below:

- information relating to your health where you are taken unwell or injured on our premises and receive first aid treatment. This information is only used to record and manage first aid. We record and use this information on the basis that we are legally required to;
- information relating to access needs that you choose to tell us about when you are registering to attend a Wellcome Collection event. This information is only used to ensure that your access requirements are met on the basis that you consent to providing this information to us;
- information relating to access needs, special educational needs and cognitive impairment that you tell us about in the course of website testing activity. We use this information on the basis that we need to, to pursue our legitimate interest (and that of our website users) of ensuring the content on our websites is presented in the most effective manner for all website visitors, on the basis that you consent to providing this information to us.

### **Special category personal information in our collections**

In addition, we collect and use special categories of personal data such as information relating to the physical and mental health and sexual life of individuals for archiving purposes in the public interest within Wellcome Collection. Our activities include acquiring, appraising, describing, storing, promoting and providing access in order to ensure the preservation and accessibility – now or in the future – of records of public interest.

## **3. If you fail to provide personal information**

If you fail to provide the information required to set up an online account on one of our websites, to subscribe to our newsletters or to register for our events, we will not be able to provide these services to you.

If as a job participant you fail to provide the personal information requested via our application system during the job application process, we will not be able to process your job application.

## **4. Automated decision-making**

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

## **5. How we share your information**

Where necessary for the purposes described in this Statement, may share your personal information within Wellcome as well as with our third-party service providers.

Where necessary for the purposes described in this Statement, we may share your information as follows:

### **Third-party service providers**

We may share your personal information with third-party service providers and suppliers, some of whom may be based outside the EEA (in which case please see the section [International transfers of your information- outside of the EEA](#) below). Some of our service providers will have access to your information to perform services on our behalf. We share your information with the following types of service providers:

- our systems providers i.e. for our library management system, CRM system, IT and communications systems;
- our integrated services provider which operates our reception, security and mail room functions within our premises at 183 and 215 Euston Road;
- our email marketing and communications provider that distributes email publications on our behalf, where you opt-in to receive such publications;
- the provider of our web-based event registration system, to send out event invites and registration forms to those invited to Wellcome events;
- third party survey providers that we use i.e. for collecting visitor feedback on Wellcome Collection events and collecting feedback and pre-screening information for website evaluation and research;
- external research agencies that we use for analysing and reporting on Wellcome Collection surveys;
- our travel management company, hotels and transportation providers and travel security partner (where Wellcome is organising travel associated with an event you are attending) for the purpose of making travel arrangements and sending you relevant travel alerts whilst you are travelling to/from a Wellcome event;
- event venue operators, where you are attending a Wellcome-organised event, for the purpose of them administering the event;
- in the event that you are involved in a significant accident or suffer a significant injury whilst on our premises, we will share your contact details with our insurers.

### **Partners and associated organisations**

We will share your information with partner organisations where it is necessary for us to do so i.e. where you are applying to attend a Wellcome-organised event and your application needs to be considered by those we are partnering with to put on the event.

### **Internally within Wellcome**

We will share your personal information within Wellcome for the purposes set out in this Statement.

### **Where otherwise required to do so**

In exceptionally rare circumstances, we may be required to share your information if required to do so under a court order or if requested by the police or other regulatory or governmental authority.

For further information on how we share your information, contact our [Data Protection Officer](#).

## 6. How we look after your information

Wellcome is committed to safeguarding your personal information and your privacy. We have put in place appropriate security measures to prevent your information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information 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.

Where we have given you (or where you have chosen) a password to access certain parts of our sites, you are responsible for keeping this password confidential.

### **Technical solutions**

We securely store all information you provide to us using one or more technical measures considering the nature, scope, context and purpose for which we are using the information. Such measures will always be appropriate to the risk.

### **Breach Procedures**

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **International transfers of your information- outside of the EEA**

We may transfer personal information we collect about you outside of the European Economic Area (“**EEA**”) where we use service providers that store information on servers based outside of the EEA. To ensure that your personal information is protected, since the data protection regimes in these locations might be less exacting than within the EEA, we ensure that one of the following safeguards is already in place, or will be put in place prior to transfer:

- the recipient is listed on the EU-US Privacy Shield;
- the recipient has entered into Binding Corporate Rules with us; or
- the recipient has entered into the EU Model Clauses with us.

We may also transfer your personal information outside the EEA to partners and associated organisations for the purposes set out in this Statement. For example, where you are applying for a funded place at a Wellcome event and we need to share your application with our event partners outside the EEA to assess your application.

Please Contact our [Data Protection Officer](#) for further details on how we look after your information.

## 7. How long we keep and use your information

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it. This may mean holding on to your personal information for a certain period of time after you have ceased to have a relationship with Wellcome, such as for the purposes of satisfying any legal, accounting, or reporting requirements.

When determining the appropriate period of time to retain your personal information, we consider several factors, including the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of your information, the purposes for which we handle and use your information and whether we can achieve those purposes through other means, and the applicable legal requirements. We securely erase your information once it is no longer needed.

For the purpose of archiving in the public interest, we permanently archive certain information, which we hold within our corporate archive and our collections in Wellcome Collection. This includes information that supports the preservation of Wellcome's historical, cultural and public engagement resources and activities, and funding activities, as well as the information held in our collections that is transferred to Wellcome Collection by lenders and donors. Further information on how we handle these collections and make them available is set out in Wellcome Collection's [Access Policy](#) and [procedures](#).

Details of retention periods for different aspects of your personal information are set out in our retention policy. Contact our [Data Protection Officer](#) for further information.

## 8. Your rights over your information

If you have an online account with us, we hope that you find your information is easy to access and update as it is important that the personal information we hold about you is accurate and current.

At any time, you have the right to, amongst other things, access the information we hold on you or notify us that you no longer wish to be included on our database for marketing purposes. If you wish to contact us regarding your information, please speak to our [Data Protection Officer](#).

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third-party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Withdraw your consent** for us to use your personal information at any time, where we are handling your information on the basis of your consent.

If you'd like to exercise any of the rights mentioned above, please contact our [Data Protection Officer](#).

In almost all circumstances, you can exercise any of these rights free of charge. However, in circumstances where your request for access is unfounded or excessive we may charge you a reasonable administrative fee or simply refuse to respond.

Although we hope that you would never feel that you had to, you do have the right to lodge a complaint with the supervisory authority, the Information Commissioner's Office: [www.ico.org.uk](http://www.ico.org.uk).

## **9. Changes to this Statement**

This Statement was last updated on 23 May 2018. Changes to this Statement may be made in response to changes to regulation, legislation or Wellcome itself. Therefore, we ask that you come back every now and then to check for any updates.