

Confidentiality, Data Protection & Privacy Notice

This Confidentiality, Data Protection & Privacy Notice (Notice), explains how King's Careers & Employability (King's, the University, we, our, us) processes the personal data of our users.

The Notice and associated Statement(s) at the end of this document should be read alongside these other Notices which are in place at King's College London:

- [King's College London Privacy Notice](#)
- [Student Data Collection Notice](#)
- [Prospective Student Data Collection Notice](#)
- [Alumni and Supporters' Privacy Statement](#)

All data processing is carried out in compliance with [King's Data Protection Policy](#).

This Notice applies to all users of King's Careers & Employability (KC&E) including:

- King's College London students.
- King's College London staff.
- King's College London alumni.
- Students of other higher education institutions permitted to access elements of support from King's Careers & Employability.
- Employers, intermediaries, recruitment & outsourcing agencies (RPOs)
- Members of the public (as speakers, facilitators or guests).
- Suppliers and solutions providers.

'Users' and 'applicants' in the context of this statement refers to all users of our services, which includes students, prospective students, alumni, researchers, staff and other internal clients. To view full data held by King's College London you will need to submit a [request for personal information](#).

King's College London is the data controller of your personal data. The University has appointed a Data Protection Officer, who can be contacted via info-compliance@kcl.ac.uk or via Information Compliance Team, King's College London, Room SW1.09, Somerset House East Wing, Strand Campus, London WC2R 2LS.

We also abide by the [AGCAS Code of Practice](#), ensuring that our services and provision is guided by the principles of equality of opportunity, accessibility, impartiality, transparency and confidentiality.

What information we hold about you

We may collect and process the following data about you:

Students, Doctoral Researchers & Recent Alumni

- Full name (and preferred name).
- Gender.
- Date of birth.
- Nationality and fee status.
- Student and/or graduate status.
- Student number / 'K' number.
- Faculty, department and course qualification.
- Mode of study.
- Course length, start and end dates.
- Student level and year of study.
- Home campus.
- King's email address.
- Personal email address.
- Personal pronouns.
- Phone number.
- Ethnicity.
- Disability markers.
- Information on your career confidence and career thinking (including your stage of career readiness, whether you have work experience in the last 12 months and your aspirations for your graduate career beyond King's) as completed as part of your induction each year OR as part of your exit task from the University.
- Feedback responses e.g. from surveys.
- Appointment notes e.g. from appointments undertaken.
- Careers & Employability usage e.g. from activities, programmes and systems accessed.
- Applications for programmes run by King's Careers & Employability, including application forms, CVs or cover letters.

Research Staff

- Full name (and preferred name).
- Gender.
- Date of birth.
- Nationality.
- Staff status.
- Staff number / 'K' number.
- Faculty and department.
- Home campus.
- King's email address.
- Personal pronouns [if given].
- Phone number.

- Feedback responses e.g. from surveys.
- Appointment notes e.g. from appointments undertaken.
- Careers & Employability usage e.g. from activities, programmes and systems accessed.
- Applications for programmes run by King's Careers & Employability, including application forms, CVs or cover letters.

Academic & Professional Services Staff

- Full name.
- Faculty and department.
- Job title.
- King's email address.
- Work phone number.
- Preferred name [if given].
- Feedback responses e.g. from surveys.
- Careers & Employability usage e.g. from systems accessed.

Employers, Intermediaries, Solutions Providers and RPOs

- Full name.
- A work email address.
- A work phone number.
- A job title.
- Feedback responses e.g. from surveys.
- Meeting notes e.g. from meetings undertaken.
- Careers & Employability usage e.g. from activities, programmes and systems accessed.

Members of the public (as speakers, facilitators or guests)

- Full name.
- A work email address.
- A work phone number.
- A job title.
- Gender.
- Preferred pronouns [if given].
- A biography of your professional experience.

How we collect and process data about you

We collect most of the personal information we hold about you via:

- automatic data feeds from King's system, via secure feeds from the SITS student record system (current students, researchers & recent alumni) or the HR record system (research staff).
- enrolment and exit tasks during your time at King's as a student or doctoral researcher.
- through the HESA-facilitated Graduate Outcomes Survey (GOS) which graduates of the University are requested to complete following their course at King's.

- our careers management system, email system, and live chat function.
- our online forms and surveys.
- in-person interactions in our physical student hubs, appointments, drop-ins, workshops or events.
- virtual interactions in our appointments, drop-ins, workshops or events.
- participation in our programmes and projects.
- structured governance and advisory boards (students, researchers and employers only).

How we use the information we hold about you, and the legal basis for processing your data under GDPR (General Data Protection Regulation)– the legislation which governs how data is protected).

We need the information listed above primarily for the provision of King's Careers & Employability services and resources. We may process your data to enable King's to meet our commitments to you, such as career development, employability skill development (including customising content you see on our platforms based on preferences set within our careers management system), teaching, support with your research or assessment or to provide careers interactions to our students with employers, speakers and organisations.

In some cases, we may use your personal information to pursue a legitimate interest of our own or those of a third party, provided your interests and fundamental rights do not override that interest. The "legitimate interest" is generally the interest of King's (or third party) in providing or supporting the provision of higher education. The situations in which we will process your personal information are listed below.

We use the information we hold about you to:

- give you access to King's Careers & Employability support and provision.
- provide you with access to digital tools, resources and systems.
- provide and administer King's Careers & Employability services, e.g. booking appointments, registering for events, attending workshops, participating in programming.
- respond to enquiries
- manage academic interaction with careers education through integrating employability.
- develop and deliver work-based learning programming and support student lifecycle support for these initiatives.
- facilitate the completion of mandatory government data sets [e.g. the Graduate Outcomes Survey] (recent alumni only).
- facilitate the interaction of employers, speakers and organisations to meet with our student, alumni and researcher audiences through events, panels, workshops and bespoke activity (Employers and members of the public only).
- gather usage statistics
- communicate with you about the services and resources that King's Careers & Employability provide to students, researchers and recent alumni.
- let you know about the services and resources that King's Careers & Employability provide to employers (employers and members of the public only).
- internal learning and data analytics to improve the experience for users, support the design and delivery of King's Careers & Employability services, and to better understand our community in order to improve engagement, access, and inclusion. Where we use personal

data for these purposes (e.g. through focus groups, Student Advisory Board, Employer Advisory Board), we will ensure that any published information is anonymised. Results will be presented as aggregate data.

We process student and research staff data in King's CareerConnect to manage access to our careers services and provision connected with their education at King's, on the basis of public task outlined in General Data Protection Regulation, including developing services and enhancing the student experience, and as part of our official functions in the public interest.

We may also process 'special categories' of more sensitive personal data for current students, recent alumni and researchers only, namely information about your race or ethnicity. Special category data will be used only in accordance with the above legal basis.

We process staff, employer, external third-party partner and recent alumni data in King's CareerConnect by legitimate interest to provide continued access to our services, assist with any enquiry logged, provide access to support your own students or to interact and engage with our employer activities.

Where permission is required for our use of your personal data, by ticking the appropriate consent box or otherwise communicating your permission (for example, by email or by providing us with non-mandatory information), you consent to our use of that personal data as set out in this policy. You can always withdraw your permission and we will stop any processing of your personal data with your consent. However, this will not affect the lawfulness of any processing carried out before your withdrawal of consent and you may no longer be able to use the website and services in the same way you did before.

Your personal data may also be processed by King's Careers & Employability for compliance with any legal obligations or as part of the wider King's public interest task. For example:

- to meet our legal obligations (for example, relating to statutory reporting under Graduate Outcomes [see separate section below in this Notice] etc.)
- for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.
- where a legislative requirement compels us.

In certain exceptional circumstances where it is believed we have a case for processing data in the vital interest, King's Careers & Employability staff may be obliged to inform other services within King's or externally without prior consent, where there is a legal or 'duty of care' imperative.

Where possible, appropriate discussions will be held to inform the individual that this is the case and gain consent. These circumstances may include:

- when an individual poses a risk to themselves or others.
- where a legal obligation exists.
- where a user has breached the University's regulations or policies.

Special category data and vital interest data

Special category data and criminal conviction data require a higher level of protection than personal data. Listed below are examples of processing activities that we regularly undertake in respect of these types of data for certain users (students, doctoral researchers, research staff, recent alumni).

- Race and ethnicity
- Health (including disability)

We may process your ethnicity, health and disability data where necessary to make reasonable adjustments for disability and/or to monitor equal opportunities. We may make reasonable adjustments for the appointments, programmes, and events that we run.

This includes any ethnicity or health disability data you share with us through communication with us via email or any other platform.

Where required to carry out our duties and obligations, we may share data with third parties as identified in the section below.

In addition to the activities listed below, it may sometimes be necessary to process this sort of information for exceptional reasons, for example, because it is necessary to protect your vital interests (including in relation to health and safety) or those of another person or for safeguarding purposes.

Where this occurs, King's Careers & Employability staff may be obliged to inform other services within King's or externally without prior consent, where there is a legal or 'duty of care' imperative.

Where possible, appropriate discussions will be held to inform the individual that this is the case and gain consent. These circumstances may include:

- when an individual poses a risk to themselves or others.
- where a legal obligation exists.
- where a user has breached the University's regulations or policies.

Our King's CareerConnect system and access to the information we hold about you

Our careers management platform, King's CareerConnect, provides access to many of our services for our audiences, including:

- appointment and event booking.
- query management.
- self-paced learning pathways.
- our career discovery feed of articles and resources.
- email marketing.
- organisation profiles.
- organisation contact management.
- our skills reflection tool ('King's Skill for the Future').

- industry placement approval.
- feedback collection.
- a vacancy board.
- user record management.

If you enter incorrect log-in details three consecutive times, you will be temporarily blocked from accessing the system, and be required to email careers@kcl.ac.uk (students, doctoral researchers, research staff, academics & professional services staff) or employers@kcl.ac.uk (employers, guest speakers, facilitators, third-parties, solutions providers, RPOs) to reset your account.

Data will be stored securely on your King's CareerConnect user profile, which is provided by Group GTI (as the data processor) and hosted on the cloud by Amazon Web Services (AWS) (as a sub-processor). Group GTI has access to the system to investigate support issues only.

King's Careers & Employability retains overall responsibility for all data within the database and King's Careers & Employability staff manage the system on a day-to-day basis by updating the appointments and event calendars, approving organisation and associated opportunities and making notes on users.

The University's agreement and data protection impact assessment (DPIA) with Group GTI explicitly defines the security levels that are in place to prevent unauthorised access; it also makes explicit mention that personal data will not be made available to any third party (unless where explicitly referenced sub-processors are utilised – and the basis in which that sub-processor has been contracted) and that personal data is processed only within the terms of the contract agreement, for both processors and sub-processors.

Group GTI sub-processors (as of 4 February 2025)

Category	Service	Data Category	Where the Data is stored	Description / Purpose
Analytics and data services	Google Analytics	Operational data	Global	GTI uses Google Analytics to understand and improve how users interact with our services.
	Microsoft Clarity	Operational data	Global	GTI uses Microsoft Clarity to understand and improve how users interact with our services.
	Looker	Operational data	EU (Ireland)	GTI uses Looker to power our operational business intelligence reporting.

Category	Service	Data Category	Where the Data is stored	Description / Purpose
Infrastructure Providers	Amazon Web Services (AWS)	All Data Categories	EU	GTI uses AWS to host our cloud service provisions and data backups.
SaaS	Mailgun	Personal data	UK	GTI uses mailgun to send and receive transactional emails.
	Maxemail	Personal data	UK	GTI uses Maxemail to manage email notification templates and processing.
	Hightouch	Personal data	AWS (Dublin)	GTI uses Hightouch to provide marketing platform integrations.

King's CareerConnect access is only open to current students, research staff and recent alumni (up to two years following course completion) of King's College London to access our services – and to employers to facilitate your interaction with our services, so we need to be able to recognise you as an authentic user.

To function, King's CareerConnect requires elements of data to be fed into the system or added by new users.

Data held in King's CareerConnect, our careers management system is provided by King's College London as part of the enrolment/exit process and/or when updating your account profile on King's CareerConnect.

- By completing a profile on King's CareerConnect, you grant us permission to use your data to communicate with you information about the products or services we provide as King's Careers & Employability e.g. vacancies, events and appointments.
- Your contact details, including your email(s) and telephone number will also be used to provide further details, reminders and notifications regarding any activity booked through King's Careers & Employability and to request feedback on our services and activities.
- Users must opt-in to receive targeted mailings and newsletters from us, but core system messages will be related under our legal basis of public task.
- Any changes you request to how your personal information is processed for the purposes of marketing and/or the provision of service updates will be acted on promptly.

Students, Doctoral Researchers & Recent Alumni

If you wish to amend this data, you will need to contact [Student Services](#) as King's Careers & Employability are unable to edit data within King's CareerConnect which is transitioned from SITS.

Users can also provide additional information through direct consent when updating their profile, including given name(s), preferred pronouns, occupational interests, additional contact details and register for email updates and mailings.

Research Staff & Post-docs

If you wish to amend this data, you will need to contact Human Resources as King's Careers & Employability are unable to edit data within King's CareerConnect which is transitioned from the PeopleXD system.

Users can also provide additional information through direct consent when updating their profile, including given name(s), preferred pronouns, occupational interests, additional contact details and register for email updates and mailings.

Academic & Professional Services Staff

Staff can use their King's IT credentials to access some of our services, including our event calendar, vacancy board, digital self-paced pathways, career discovery feed and skills reflection tool ('King's Skills for the Future').

Users can also provide additional information through direct consent when updating their profile, including given name(s), preferred pronouns, job title and academic title.

Employers, Intermediaries & RPOs

Organisations, and representatives of those organisations can register for a user account to interact with our service users, advertise jobs and opportunities, book onto events and workshops, participate in our programmes and host students on work-based learning activities.

Data subjects have the right of access to your personal data, to rectify, erase (in certain circumstances), restrict processing, object or define data portability. You can view the data held by King's Careers & Employability at any time by logging into your account and selecting 'my profile' from the menu.

Users can adjust their email preferences by logging into your user profile at any time, or clicking the 'update profile' link at the bottom of system-generated emails.

If you wish to request copies of the wider data we hold about you please [contact us](#).

Transfers of your data overseas

There may be occasions when we transfer your data overseas, for example, if we communicate with you using a cloud-based service provider that operates outside the UK, or Work-based Learning applications where selection takes place overseas, such transfers will only take place if one of the following applies:

- the country receiving the data is considered by the UK to provide an adequate level of data protection;
- the organisation receiving the data is covered by an arrangement recognised by the UK as providing an adequate standard of data protection;
- the transfer is governed by approved contractual clauses;
- the transfer has your consent;
- the transfer is necessary for the performance of a contract with you or to take steps requested by you prior to entering into that contract;
- the transfer is necessary for the performance of a contract with another person, which is in your interests;
- the transfer is necessary in order to protect your vital interests or of those of other persons, where you or other persons are incapable of giving consent;
- the transfer is necessary for the exercise of legal claims; or
- the transfer is necessary for important reasons of public interest.

Automated decision-making and profiling

We provide access to some programmes and initiatives to our service users (students, researchers and recent alumni) on the basis of personal data held to on the lawful basis of public task, e.g. to facilitate work-based learning programming to certain groups of users because of data held about their career interests or confidence.

Additionally, we may process sensitive information you provided to the University on your student record or when you requested assistance, along with any documentation supplied, uploaded or held in our systems (e.g. a CV, application for an award, submission of a placement record) under direct consent.

We use log information on your access to our systems (such as username, IP address, country, city, time and HTTP status) to enhance existing log file analysis and therefore protect against cyber-attacks and fraudulent activities.

The analysis will identify King's accounts that may have been compromised, so that these accounts can be secured before King's is blocked from accessing systems using the account for fraudulent activities such as spam and sending phishing emails.

The legal basis for the processing activities is our legitimate interest to protect against cyber-attacks and fraudulent activity.

Change of purpose

We will only use your personal information for the purposes for which we collected 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.

We may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Who we share your information with

All staff employed by King's Careers & Employability, either directly or through King's Talent Bank or other agencies, undertake mandatory annual data protection training to ensure we are managing, storing and using data properly and in accordance with University policy and our regulatory requirements.

All King's Careers & Employability users must comply with our [policies and procedures for all users](#) (and, for employers, our [additional policies](#) and our [statement of professional standards](#)).

If you do not abide by our regulations, we may share your personal data with other departments in King's or your home institution. If we are required to issue an invoice for an activity you have participated in, your data will be shared with King's Finance.

We may also use your data to provide careers usage and interaction statistics to your home faculty or department and to personal tutors.

King's Careers & Employability will not share King's CareerConnect subject data with other external parties for any purposes, other than if you have explicitly provided us with permission to do so by consent. This includes:

- King's College London Students' Union (KCLSU)
- Government agencies*
- Research Councils
- Employers & Organisations
- Other Users (e.g. students, alumni, research staff)

*Excluding those areas where we have legal obligation (e.g. Jisc Graduate Outcomes Survey)

Your feedback may be used anonymously for marketing purposes.

How long we keep your information for

Student, alumni and researcher and research staff data will be held only for as long as it is needed to meet our purposes, including any relating to legal, accounting, or reporting requirements. Details of retention periods for different types of data are available in the King's [data retention schedule\(s\)](#).

Academic and professional services staff data held in King's CareerConnect will be held for two years after which time we will prompt you to either reset your account or it will be terminated and all data held will be anonymised and deleted.

Employer, supplier and other external public guests (e.g. guest speaker) information held in King's CareerConnect and elsewhere will be held indefinitely unless a deletion request is submitted, or

when the organisation informs King's Careers & Employability that a recruiter has left their employment.

We retain data on job opportunities for up to two years on our system(s), after which data is anonymised and archived.

External services and functions

Other third-party systems and software

Where a third-party service provider requires you to create an account, your contract is with that provider and your data is stored by them, not by King's College London.

King's Careers & Employability provides exclusive access to various digital education and online resources, namely:

- [CareerSet](#)
- [CaseCoach](#)
- [DigData](#)
- [eCareersGrad](#)
- [Graduates First](#)
- [GoinGlobal](#)
- [Shortlist.me](#)
- [The Forage](#)
- [The Pay Index](#)
- [Practera](#)
- [VMock](#) [King's Business School only]

Usage of each of these systems requires users to give their consent to process their personal information and their usage is governed by their own privacy statements, linked above.

Users can amend or delete their user account(s) and associated profiles for these products through the website(s) for each product at any time.

Where access to systems is via single sign-on via your University username and password, your data will be anonymous at the point of use of the third party authentication service and each system has undergone a full Data Protection Impact Assessment (DPIA) aligned with King's Data Protection Procedures.

Graduate Outcomes Survey (GOS)

King's College London has a legal obligation to pass details of all recent graduates to [Jisc](#), for the purposes of conducting the [Graduate Outcomes Survey](#) (GOS) at approximately 15 months after your graduation date under the Further and Higher Education Act 1992.

The legal basis for processing of this information is conducted on the basis of a task carried out in the public interest or in the exercise of official authority vested in the Controller outlined in General

Data Protection Regulation (the "GDPR"), Article 6(1)(e) and for statistical and research purposes (see GDPR Article 89).

The following is taken from the HESA Jisc website (at October 2022):

“On 4 October 2022 the Higher Education Statistics Agency (HESA) merged with Jisc. HESA is now part of Jisc. Jisc is a not-for-profit company limited by guarantee, registered in England (company number: 05747339; charity number: 1149740). Any personal data processed by HESA as controller has now transferred to Jisc under the purposes set out in this collection notice and Jisc is now the controller of this personal data. References to ‘HESA Information’ in this privacy notice means data controlled by Jisc.

Jisc is data controller of the Graduate Outcomes website and of any processing described on it, unless otherwise indicated. This means it is Jisc who determines the manner and purpose of processing. Under UK data protection laws, we are required to provide you with certain information about who we are, how we process your personal data and for what purposes and your rights in relation to your personal data. This information is provided in this collection notice. It is important that you read this information.

Details of how to exercise your data protection rights can be found in this collection notice. If you have any queries about how your personal data is processed, please contact data.protection@hesa.ac.uk”.

- See the full [Jisc student collection notice for details](#)

Changes to this privacy notice and complaints

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any further queries, need assistance or have a complaint about how your data has been used please contact King's Information Compliance Team:

Email: info-compliance@kcl.ac.uk

Web: [Information Compliance / Policy Hub](#)

- [GTI TARGETconnect](#)
- [Information Commissioners' Office](#)

Broader confidentiality statements

Confidentiality in careers discussions and practice interviews and events

Our appointments, drop-ins and practice interview discussions are held in confidence and information discussed will remain confidential within King's Careers & Employability.

- Issues may be discussed between staff members in line with professional judgement, enabling us to ensure a full and flexible service to our stakeholders.

- Neither the identities of our users nor the details of our contact with them will be provided to any other individual or organisation, either within King's College London or externally.

Notes taken by Careers Consultants, Application Advisers and other King's Careers & Employability staff will be appropriate, factual and accessible to all staff within the department for the purposes of ensuring continuity and flexibility of service. Users have access to view these notes at any time from their King's CareerConnect account.

Career Consultants, Application Advisers and other members of staff may from time-to-time comment on hard-copy documents reviewed during an appointment, drop-in or event.

In these circumstances, the following actions apply:

- After use, hard copies are immediately put into the confidential waste system to be disposed of by the University in accordance with waste disposal procedures.
- Emails containing document attachments or links to document sharing platforms are deleted from all inboxes, sent items, and deleted items immediately after being sent.
- Documents which have been downloaded are deleted from their storage locations (which may include the local downloads folders, desktop or other file locations) immediately after action has been taken with them.

In some circumstances, staff may temporarily retain such documents but would always let the user know the reason why and agree a timeframe for deletion via consent.

Occasionally model documents are retained for use as teaching tools. In these circumstances, staff must retain written consent from the user and anonymise where asked.

Applications for Work-based Learning & King's Experience Awards

- In submitting an application/(s) for either a work-based learning programme facilitated by us or a King's Experience Award, you will provide consent that any documents uploaded (CV, cover letter, online form, transcripts etc.) as part of your application(s) may be shared with external parties for the purposes of making decisions regarding your application, namely:
 - King's College London departments and/or faculties
 - External internship or Insights host employers
- Applicants will be prompted and reminded of this at the point of application and requested to tick a box confirming their consent to this transfer.
- Assessments or reports submitted to complete a King's Experience Award or participation in the Student Opportunity Fund are added to a submission repository for use by future participants, available to review by King's staff and students through secure platforms, and which may be shared in literature in hard or soft copy.
- Documents uploaded to King's CareerConnect can be amended and/or removed at any time by users.
- King's Careers & Employability will only transfer personal and/or sensitive category data outside the EEA to organisations that have completed the university's standard Data Protection (Controller-Controller) Template Agreement.

Photography, recording & filming

King's Careers & Employability reserves the right to record events and workshops, take photographs/video at events held on campus or hosted by us at employer premises or alternative venues.

- Images/video taken may be used for educational or marketing materials in both print and digital form and available to both internal and external audiences.
- Testimonials provided as part of an internship reflection or award ceremony may be shared with both internal and external audiences.
- By attending our events you are agreeing with the disclaimer present on King's CareerConnect which grants King's Careers & Employability permission to undertake photography/filming/audio recording and use these media in our marketing or for further educational usage on our virtual learning environment (KEATS).
- If, for whatever reason, you wish for an image/video to be removed please contact careers@kcl.ac.uk and this will be actioned within 14 days of receipt of your request.

King's Careers & Employability takes no responsibility for photos/video or recordings taken at events and activities run by external parties and/or employers.

This Notice and associated statements are reviewed and updated annually.

Last updated: 20 March 2025

King's Careers & Employability is a member of the Association of Graduate Careers Advisory Services (AGCAS) and as such upholds their codes of best practice in graduate recruitment.