OUP statement on GDPR for educational establishments

Oxford University Press ('OUP') is committed to maintaining the highest standards of integrity in all aspects of our operations. As a provider of services to your institute we understand our obligations under the General Data Protection Regulation ('GDPR'), and have taken appropriate measures to ensure that both our systems and our business process meet the requirements of the new legislation.

When we provide products and services, we make decisions about how personal data is handled, and those decisions are executed by the companies with whom we share data; so by definition we are a Data Controller—we are not a Data Processor. When you share data with us, you are passing information from one Data Controller (making decisions about data in the act of running a school) to another (who is making decisions about data to deliver effective educational platforms). We understand, respect, and share the responsibility of schools as Data Controllers; like you, we want our suppliers to be fully compliant with the GDPR, and we issue robust and binding contracts to the organizations and businesses that process data on our behalf.

Under the terms of the GDPR, it is a mandatory requirement for a contract to be in place between a Data Processor and a Data Controller. In the instance of our web platforms, we are a Data Controller in our own right, because we determine the purposes for which any personal data collected is to be processed. We use personal information to verify that you are a subscriber, and to deliver relevant content on the website to you as part of your subscription. With this in mind, we are not issuing individual contracts or entering into any kind of data processing addendum with subscribers to our web platforms, because we are not your Data Processors. Our terms and conditions of your use of our web platforms are available on each website; these are consistent with the requirements of the GDPR, and remain unchanged. Overall, our approach to the GDPR is a continuation of our arrangements to comply with existing and previous legislation.

We have updated our global Privacy Policy, which is located at global.oup.com/privacy.
This documents how we use personal data to promote and provide OUP products and services. It applies to all users of our web platforms globally; there is no separate policy for students.

We will keep your personal data on our web platforms for as long as you have an active subscription with us, and for a short period afterwards, in case you choose to reactivate your subscription. We also keep separate records of your purchases from us for customer services and related purposes.

We have comprehensive technical and organizational security measures in place to protect personal data. Our education platforms—for example, Oxford Online Placement Test—are regularly penetration tested by certified third parties. Our developers are trained in secure coding techniques, and we are encrypting our backend databases. Our hosting environment is ISO27001 compliant, and the data for these platforms is stored within the European Economic Area.

We have a suite of policies and standards for employees that set out our approach to Information Security and Data Privacy, which we review and update regularly as appropriate. They include our standards for filing, storing, processing, sharing, and deleting personal data. All employees of OUP receive annual awareness training, and must read, and formally acknowledge, the following internal documents:

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- Information Security Policy
- Data Privacy Policy
- Acceptable Use Policy

In addition, we require every employee to acknowledge that they have read our Code of Conduct, which reinforces our commitment to treating personal data fairly and lawfully. We also have a Third Party Code of Conduct, which all of our suppliers and contractors have to sign as part of working with OUP.

If you have any queries about our approach to the implementation of the GDPR please contact us at privacy@oup.com.

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