

Ellison Scholars

The Ellison Scholars Programme

The Ellison Scholars programme (“the Programme”) is part of the Ellison Institute of Technology (“the Institute”) with sites in Los Angeles, USA and Oxford, UK. The Ellison Scholars programme operates from the Oxford campus (registered as “Ellison Oxford Limited”); Ellison Oxford Ltd. is a wholly-owned subsidiary of the Ellison Institute LLC.

Ellison Oxford is a limited company incorporated under the laws of England and Wales with registration number **13773507**, with a registered office at **Three Bunhill Row, London, EC1Y 8YZ**.

Ellison Scholars is a scholarship programme that funds full-time study at the University of Oxford (“the University”) and an innovation accelerator where Ellison Scholars (“Scholars”) work on real world issues with industry experts to help solve some of humanity’s greatest challenges.

Privacy Notice

1. WHO WE ARE

The **Ellison Scholars programme** seeks exceptional people around the world who want to have an impact in and through technology, and accelerates their journey to real-world impact in one of the Institute’s four areas of humane endeavour:

- Medical science and healthcare
- Food security and sustainable agriculture
- Clean energy and climate change
- Government policy and economics

Scholars receive full funding for study at the University of Oxford and the equivalent of paid summer internships, working on innovation projects to solve global problems alongside leaders in the field.

2. ABOUT PERSONAL DATA

The term ‘personal data’ refers to any information relating to you that identifies you, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, or an online identifier, or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

In some instances, we may also collect sensitive personal data, including personal data such as race, religion or sexual orientation, defined as “Special Category Data” in the UK General Data Protection Regulation (GDPR), for which there are additional obligations.

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3. THE PURPOSE OF THIS PRIVACY NOTICE

This privacy notice describes how we process your personal data in the context of participation in the Scholars Programme. This includes when you sign up to our mailing lists and receive our newsletters, interact with our website, submit an application, provide a reference for an applicant, assist with outreach, selection or programme delivery, send us an enquiry, attend an information session, or otherwise engage with the Ellison Scholars programme. This notice also includes those we contact with a legitimate interest – primarily to share information about the Programme with relevant organisations, invite applications, and conduct due-diligence on scholarship applicants. This privacy notice explains what personal data we collect from you and how we collect, use, store and disclose it. This privacy notice also contains information about your rights under applicable data protection legislation.

It is important that you read this privacy notice together with any other privacy notices issued to you in the future, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

4. WHAT PERSONAL DATA WE COLLECT AND HOW WE COLLECT IT

Most of the personal information we process is provided to us directly by you in one of the following ways:

- As part of an application to be an Ellison Scholar (whether or not this is submitted). Further information will be collected via forms, emails and calls as applicants progress through our selection processes. The application form includes some sensitive personal data (such as race and gender) that is collected to enable us to monitor demographics throughout the application process; in certain cases, applicants can opt out of providing this information.
- Where necessary, in order for us to administer the scholarship programme for Ellison Scholars – usually collected upon our request via emails and forms.
- As part of an application for a role to assist with the delivery of the Programme (e.g. to be a selector / mentor / guest speaker).
- As part of an enquiry or communication sent to us via the Ellison Scholars email, social media, or any other channel.
- As payment information (e.g. account details) provided in order for us to make payments, for example invoices, or in order to administer the financial benefits of the Programme.
- So that you can receive information from us (e.g. newsletter sign-ups), as well as any information you provide in response to our newsletters, communications or any other form of marketing. This is usually collected via forms or emails.

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We receive personal information indirectly, from the following sources and in the following scenarios:

- When you access our websites or platforms, we receive information about your browser or device.
- References are required for applications to the scholarship to be considered complete. Third parties (including teachers, school administrators, representatives of relevant organisations) will be asked to provide additional information about applicants to accompany their application, namely:
 - how long, and in what capacity, they know the applicant;
 - confirmation of actual / predicted grades;
 - information on how, and to what extent, the applicant meets the selection criteria for the scholarship;
 - confirmation that the applicant meets the scholarship's eligibility criteria;
 - an assessment of how the applicant might fare whilst studying at the University of Oxford.

Referees may also provide anecdotal / historical evidence to substantiate their judgements, including any background information they deem useful to us as we process the application. Applicants are asked to obtain the consent of referees before they submit their contact details. In addition, referees are asked to consult with applicants to ensure that the applicants consent to the information they intend to submit, particularly with reference to any sensitive information.

- When verifying the content of a candidate's application, we may contact, where relevant, an Ellison Scholars applicant's parents / guardians, referees, schools, universities, and relevant people at an organisation with which the applicant has declared an existing relationship in our application form (e.g. NGOs, other educational programmes, competitions). Where sufficient contact information is not provided by an applicant in an application form, we may need to find these contact details through a public online search or similar means. In most cases, these checks will be adding to the information we hold on an applicant, but in some instances, we may collect information about members of the applicant's network. We may ask these individuals to confirm information given in an application and give any additional information which they believe will be useful to us in processing the application. It is made clear in the application form that by providing the information, an applicant gives consent for us to make contact.
- Anyone assisting with the delivery of the Programme who will interact with applicants (many of whom will be under the age of eighteen) will be required to undergo background checks, including social media checks, which enable the team to ensure that they do not have anything in their criminal record or social media history which makes them unsuitable for the role for which they are being considered and that there is no reason to prevent them from interacting with minors. The team may in some cases (e.g. for one-to-one mentoring) also request background checks for anyone interacting with the Ellison Scholars (all of whom will be over the

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age of eighteen). Information collected from you will enable those checks to be conducted: contact details, identification numbers (e.g. National Insurance or Social Security numbers) and a recent history of your previous addresses. Information collected from those checks will include any criminal record you may have, and in some cases, anything resulting from an in-depth social media search that may affect whether you are selected to assist with Programme delivery.

- We will receive your contact details where you are listed as a referee by an applicant.
- In the interests of widening our outreach efforts and broadening participation in delivery of the Programme, we may store publicly-available information on persons employed by, or associated with, relevant organisations. We may receive your personal data through an organisation you represent, e.g. through your organisation's website, or your LinkedIn page, where your organisation is listed by an applicant as one with which they have an existing relationship or your organisation has been identified by us as a prospective outreach partner.

5. WHY WE COLLECT, USE AND STORE YOUR PERSONAL DATA

We collect your personal data for the purpose of administering and delivering the Programme. In particular, we will process personal data for the following purposes:

- **When selecting Scholars, as necessary for us to review and assess your scholarship application**
 - This includes evaluating your application against the selection criteria and your alignment to the Ellison Scholars vision, verifying your identity, conducting due diligence on the information supplied, communicating with you about your application to respond to your enquiries and schedule interviews. This may also include carrying out background, verification and reference checks.
- **When assessing the efficacy of our outreach processes**
 - We may request select personal trait information (e.g. gender, race, religion) to enable us to assess the reach and effectiveness of our outreach efforts and to direct future endeavours.
- **When conducting outreach for the Programme**
 - We may collect information on individuals associated with relevant organisations, where those organisations may assist with finding candidates for the Programme.
- **When recruiting people to assist with delivery of the Programme**
 - This includes processing your application, verifying your identity and your suitability and eligibility for the relevant role, and to communicate with you through the process. This may also include carrying out background, verification and reference checks where appropriate.

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- **When overseeing the Ellison Scholars network – past and present**
 - This includes monitoring Scholars' wellbeing, academic performance and project work during their time on the Programme, and monitoring alumni Scholars' achievements as well as their involvement with the Programme after graduation.
- **Where necessary for our legitimate interests, as listed below, and where these interests are not overridden by your data protection rights:**
 - **To communicate with you.** This includes providing you with any services or information that you have requested, and responding to enquiries and complaints.
 - **To improve your interactions with our websites and platforms.** This includes administering our website and for internal operations, such as troubleshooting, data analysis, testing, research, statistical and survey purposes, and the optimisation and security of our websites and platforms.
 - **To protect our legal rights.** This includes, but is not limited to, use in connection with legal claims; compliance; regulatory, auditing, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation); and other ethics and compliance reporting requirements.
 - **To maintain the security and integrity of our facilities, equipment and electronic platforms.** This includes administering access rights, monitoring compliance with our protocols, and, where permitted by local law and in accordance with relevant policies, for investigations and disciplinary actions.
 - **To keep records in relation to our selection processes.** This includes data that assists us in monitoring equality and diversity in line with our policies and values, and complying with overriding obligations under equality legislation.
- **Where necessary to comply with a legal obligation:**
 - Disclosures to law enforcement agencies or in connection with legal claims, or for regulatory purposes (including disclosure of such information in connection with legal process or litigation).
- **Where you have given explicit consent:**
 - For example, we will notify you in advance and seek your explicit permission to conduct criminal background and personal reference checks, where appropriate.

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- Where you have signed up to receive newsletters or consented to our sending promotional material or communications.
- **Where necessary for the purposes of carrying out obligations in the field of employment, social security and social protection law under UK law:**
 - We will use information about your health and disability status to consider what reasonable adjustments can be made during the selection process (for example, during an interview, test or other assessment).
 - Information revealing race, ethnic origin and any disability may be processed in order to facilitate effective equal opportunities monitoring and reporting.
 - As part of programme delivery, to ensure we abide by relevant local laws.

In all these instances, we will only use your personal data for the purpose for which we collected it and in accordance with the law. We will not use your personal data for any other purpose without your prior consent. The only exception to this is if it is required or permitted by law, such as where it is necessary for the prevention, investigation, detection or prosecution of criminal offences, or the enforcement of civil law matters.

6. HOW WE WILL PROCESS INFORMATION ABOUT CRIMINAL CONVICTIONS AND OFFENCES

We envisage that we will process information about criminal convictions and offences for specific roles where it is required to discharge certain regulatory obligations – this includes all those interacting with applicants. We may also require criminal background checks for anyone interacting with Ellison Scholars on behalf of the Programme. We are entitled to carry out a criminal record check in order to satisfy ourselves that there is nothing in your criminal record history which makes you unsuitable for the role for which you are being considered. For example, where the role for which you have applied requires a high degree of trust and integrity since it involves dealing with vulnerable individuals.

We have appropriate policies and measures in place in order to safeguard the processing of such information in accordance with our legal obligations.

7. MARKETING

As described above, where you have provided your explicit consent, we may contact you via email and / or phone with promotional materials (e.g. newsletters and events), to ask you to let others know about this opportunity, and also to inform you about other opportunities on offer from our partners and other like-minded third parties.

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Where we contact you for direct marketing purposes, including those we contact from relevant organisations with whom we would like to partner to support Ellison Scholars outreach, we will comply with the requirements set out in the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) alongside the General Data Protection Regulation (GDPR).

To start receiving marketing information from us, sign up on our website or email scholars@eit.org. To stop receiving marketing information from us simply use the “Unsubscribe” link provided in the relevant email, or contact us by emailing scholars@eit.org.

8. WHO WE WILL SHARE THIS DATA WITH

For applicants, we will disclose your personal information to the relevant Ellison stakeholders in respect of the role / opportunity you have applied for, in order to make recruitment and scholarship selection decisions. This will include stakeholders within the Ellison group of organisations, which includes our parent company, the Ellison Institute and its Faculty of Fellows (i.e. anyone we appoint to assist with programme delivery).

It may also be necessary, from time to time, for us to disclose your personal data to third parties who support selection for and delivery of the Programme, including:

- Parties assisting with the purposes of the Programme – including reviewers of scholarship applications, mentors, and those involved in delivery of events or programming
- Parties processing data required for us to select people to assist with programme delivery, including with respect to background checks
- Referees
- Representatives of relevant organisations with which an applicant has declared an existing relationship
- Relatives or legal representatives of candidates
- Support service providers, such as recruitment platforms, IT hosting and / or IT maintenance providers, communications platforms, database providers.

We will only share your personal data with such third parties in connection with and for the purpose of delivering the Ellison Scholars programme. All our third-party service providers are required to take appropriate security measures to protect your personal data in line with their legal obligations. Service providers are only permitted to process your personal data for specified purposes and in accordance with our instructions.

For Scholars applicants, we may share relevant application data (name; course and college choice; and limited contact details) with the University of Oxford. Please note that the University’s admissions processes are entirely independent of the Ellison Scholars Programme; the Programme has no influence over this stage of the process. In addition, the University of Oxford may also share select information with the Programme, including evaluation of an applicant’s performance in the University

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selection process, the outcome of their university application, and for on-course Ellison Scholars, their attendance status, course and college information, the outcome of exams and overall degree outcome. With consent, the University may also share information about specific cases involving Ellison Scholars where it is beneficial for the Programme staff to be updated.

We may share deidentified, aggregated demographic data with our partners and third parties for the purposes of assessing, monitoring and demonstrating our efforts in promoting equality of opportunity.

We may also share your personal data with regulatory bodies, courts and court-appointed persons, government authorities and law enforcement officials if required for the purposes above, if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.

In the event that management of the Ellison Scholars Programme is transferred to another legal entity (in part or whole), your details may be disclosed to parties advising on the transfer and will be passed to the entity taking on the responsibility.

9. TRANSFERRING YOUR PERSONAL DATA OUTSIDE THE UK

Whenever we transfer your personal data outside of the UK, we will ensure that there are appropriate safeguards in place to protect your personal data as required by UK law.

The Institute operates across two sites, in the UK and the US. Although the Programme is conducted mostly in Oxford, personal data will be accessible to select staff in the Institute in Los Angeles, always for the purposes of delivering the Programme.

Application reviewers, mentors, or any persons we have contracted to assist with Ellison Scholars Programme recruitment, will be globally distributed and may be given limited access to an applicant's personal data for a limited time-period to enable them to execute their contracted obligations.

We currently implement the following safeguards to protect your personal data when it is transferred internationally:

- Minimising the personal data being transferred, including by removing direct identifiers where possible.
- Restricting access to time-limited sessions subject to the approval of the Ellison entities.
- Encrypting data when in transit.
- Conducting Transfer Risk Assessments (TRA) where necessary.
- Implementing standard contractual clauses (SCCs), as approved by the European Commission and the ICO.

10. HOW LONG WE WILL KEEP YOUR PERSONAL DATA

We will only keep your personal data for as long as is necessary to fulfil the purposes we collected it for, which may include satisfying any legal, accounting, or reporting requirements. The retention period depends on the type of personal data and the reason we are processing it.

When calculating the appropriate retention period for your data, we consider the nature and sensitivity of the data, the purposes for which we are processing the data, and any applicable statutory retention periods. Using these criteria, we regularly review the personal data which we hold and the purposes for which it is held and processed. Typically, this will include the period for which the personal information is actively in use, plus up to 7 years, which is the time that the information may be relevant for the establishment or defence of legal claims.

Where a minimum retention period is required by law (such as retaining records for HMRC purposes) we comply with that minimum period, plus up to 12 months to allow time for us to anonymise or delete information in accordance with our internal data management processes. We may also keep personal information for a longer period where we are processing it for scientific or historical research purposes.

When we determine that personal data can no longer be retained, we ensure that this data is either anonymised or securely deleted or destroyed. Data anonymisation will be conducted to achieve our permissible business interests, namely for the purposes of demography monitoring – to ensure the efficacy of our outreach efforts and to ensure that diversity is maximised throughout our selection processes. Additionally, anonymised data will be used for research purposes to ensure high standards in our ability to select talent.

For applicants, we will retain personal data for the following periods:

- *For successful applicants*
If your application for the scholarship is successful, personal data gathered during the selection process will be transferred as relevant to the Scholars database, and retained during your scholarship. In order to continue to provide support during and after the Programme, we will retain aspects of your data indefinitely, or until you withdraw consent. Should consent be withdrawn, there will be aspects of your data that we will continue to retain for our own historical and legal purposes.
- *For unsuccessful applicants*
If your application is unsuccessful, we will retain your personal data for 3 years after the end of the application process, and only retain such data as is necessary to enable us to comply with any legal obligations, or for the exercise or defence of legal claims (subject to any applicable legal or regulatory obligations to retain such information for a longer period).

At the end of that period, we will securely destroy or otherwise anonymise your personal data in accordance with applicable laws and regulations. In the event that any court action

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or other legal proceedings is ongoing or pending at such time, personal data will be retained and deleted after termination of the court action or proceedings as appropriate.

11. YOUR RIGHTS

You have the right to **ask us for a copy** of your personal data; to **correct, delete or restrict** processing of your personal data; and to **obtain the personal data you provide in a structured, machine-readable format**. In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we do not have to process the data to meet a contractual or other legal requirement).

Where we have asked for your consent, you may **withdraw consent** at any time. If you ask to withdraw your consent to our processing your data, this will not affect any processing which has already taken place at that time. Applicants should note that withdrawing consent to process their data will remove them from further consideration for the Programme.

These **rights can be limited**, for example if fulfilling your request would reveal personal data about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep. Relevant exemptions are included in both the GDPR and in the Data Protection Act 2018. We will inform you of any relevant exemptions we rely upon when responding to any request you make.

Where we require personal data to comply with legal or contractual obligations, then provision of such data is mandatory: if such data is not provided, then we will not be able to manage the selection or recruitment processes, or to meet obligations placed on us. In all other cases, provision of requested personal data is optional.

You are welcome to contact us for any reason in relation to our personal data processing, including **to exercise your data protection rights**. We will be able to handle any queries or rights requests more quickly if you contact us at scholars@eit.org, clearly identifying your request in the email subject, and marking your email as urgent.

You also have the right to complain to the Information Commissioner's Office (ICO). In the event that you intend to complain, we would appreciate the opportunity to address the issue prior to any complaints being made to the ICO. (The ICO also recommends that you engage with the controller prior to complaining to them.)

12. YOUR OBLIGATIONS

If any of your personal data changes whilst you are a user of our services, it is important that you update the information within your account or by email to us at scholars@eit.org to ensure that the data we hold about you is accurate and up to date.

13. HOW TO CONTACT OUR DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (DPO) to handle data protection matters. If you wish to contact us in order to exercise any of your rights referred to above or any other data protection matter, please email the DPO: privacy@eit.org.

14. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice from time to time. Updates to this privacy notice will be published on our website: www.eit.org. To ensure you are aware of any changes we make to this privacy notice, we will amend the revision date at the bottom of this page. Changes apply as soon as they are published on our website. We therefore recommend that you visit this page regularly to find out about any updates that may have been made.

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