

## **National Cipher Challenge GDPR Compliance**

**Date 28/09/2019**

*Data controller: University of Southampton*

*Information Asset: National Cipher Challenge database*

*Information Asset Owner: Prof Graham A. Niblo, School of Mathematical Sciences*

*Correspondence: Prof Graham A. Niblo, School of Mathematical Sciences, University of Southampton, University Road, Southampton, SO17 1BJ, United Kingdom*

### **Summary**

1. We use cookies to anonymously track usage of the website through Google Analytics. No personally identifiable information is recorded by Google Analytics' cookies.
2. We also use cookies to keep track of users' activities when they login in order to facilitate the core functions of the site. We don't request more information from you when registering for an account than is necessary to administer the competition. If you have any questions or concerns about this or any aspect of data security on this site then please do contact us at [cipher@soton.ac.uk](mailto:cipher@soton.ac.uk).

### **Your data**

1. We collect data about you solely for use in connection with the competition.
2. We will only share that data with those who need it in order to administer the competition or prizes. This includes the competition staff at the University of Southampton and a small number of staff in the website development team and they are only permitted to use that data in connection with the competition.
3. With the exception of the Leader Boards and material you post on the Forum, if any, we will not share your data with anyone else without your consent.
4. We will delete your data on request, submitted in writing to the address above or by email to [cipher@soton.ac.uk](mailto:cipher@soton.ac.uk)
5. You can request a full copy of the data we hold on you by writing to the address above or by email to [cipher@soton.ac.uk](mailto:cipher@soton.ac.uk)

### **Personal Data**

#### **Under age participants**

Those under 13 are asked to provide only a username and not their real name, together with a password. We explain on the registration forms that

“Because you're under 13, we are not legally allowed to collect personal information that could identify you in our database. Therefore, we ask you three security questions just in case you need to reset your password.”

#### **Participants aged 13 and over**

Those aged 13 and over are asked to provide a username and password, their real first and family names, an email address, and, as with the under 13s gender information that is not then associated with the account. Those who opt into enhanced data collection are asked to answer an additional question about their location on the night of June 16<sup>th</sup>. This is as part of the narrative form of the challenge and is not used or published in any form.

### **All participants**

On registration they are asked to volunteer their gender with the options male, female, neither and prefer not to say. If “neither” is selected then they are offered the opportunity to record a preferred description. Gender information is not associated with the individual account and is used only in aggregate with all other entries to help us understand our audience which is sufficiently large (over 1,000 registrations) to provide reasonable anonymity for this data.

Registrants are also asked to provide a team name and whether or not they are eligible for a prize. If they state that they are then they are asked for the name and email address of a teacher, parent or guardian. This information is collected so that we have someone to contact in the event that there is a problem with the submissions or the individual wins a prize.

They are also asked to provide the name of their school, which is published alongside the team name on the leaderboards. Schools may also be identified on a registration map on the website.

### **How we store the data**

The data is stored in a secure database hosted by 10 Degrees as part of their WordPress deployment. It is hosted on a secure platform called Cloudways with data centres in London.

### **Who has access to the data**

Access to the personal information in the database content is controlled by password access and disseminated on a need to know basis to a small team of named administrators at the University of Southampton and 10 Degrees web development agency. The data owner is Prof Graham A. Niblo and GDPR compliance is monitored by the University of Southampton.

### **Ways in which we use the data we hold**

Information is used only in connection with the competition. It will not be lent, sold or otherwise provided to other organisations, or used by us in any way that is not required for the effective conduct of the competition.

*Age:* we collect date of birth to ensure that we are compliant with GDPR rules concerning under age registration. We do not store this information individually, but may use it in aggregate to tell us about the broad age profile of our competitors.

*Gender:* Again, this data is not associated with individuals, but is used in aggregate to help us better understand our audience.

*Email:* those aged 13 or over are asked to provide an email address. This is to make it easier for us to reset passwords and to contact winners.

*Name:* those aged 13 or over are asked to provide a full name so that if we need to contact you will be more certain that the email comes from us. We will also ask your permission to use it in publicity if you wish to claim a prize.

*Parent/guardian/teacher name and email:* this is used only if we need to contact someone about a problem with the website, a submission or to inform a winner.

*School:* This is published in the leader boards alongside team name and is used to analyse participation in the competition. School locations may also be published on a map on the website in order to promote participation.

### **Data that we will publish**

Information about the performance of competitors will be published on the site, in particular on the league tables, and this will comprise team names and school affiliations, but not names of individuals. The exception is that names of winners will be published as part of the prize award process, and as a condition of receiving the prize.

The forum associated with the competition will automatically publish user names, but not personal information about competitors, and the forum administrators will moderate entries to ensure that personal information is not published.

### **How long we hold and publish your personal data**

Within one year from the end of the competition the personal data stored in the registration database will be deleted. Leader boards, news items and forum posts will continue to be published as a matter of public record, including the names and affiliations of winners.

### **Further information**

We publish updates and clarifications to these and our other policies and regulations on the website [www.cipherchallenge.org](http://www.cipherchallenge.org).

You can read more about GDPR from the perspective of our developers at <https://www.10degrees.uk/blog/gdpr-compliance-and-wordpress/>