

National Cipher Challenge GDPR Compliance revised version 9

V1 published 24/03/2020

V2 revised 01/04/2020

V3 revised 20/10/2020

V4 revised 08/09/2021

V5 revised 15/09/2021

V6 revised 05/10/2021

V7 revised 14/09/2022

V8 revised 06/09/2023

V9 revised 18/09/2024

Revision history:

V9 Reviewed and updated for National Cipher Challenge 2024 to incorporate information about teacher registration and the monitoring system and to include a postal contact address

V8 Reviewed and updated for National Cipher Challenge 2023 to incorporate information about team monitoring

V7 Updated for National Cipher Challenge 2022 to incorporate minor changes in registration

V6 Updated wording on data storage and handling statement

V5 Updated to correct typos and to include information about the Teacher Registration form for National Cipher Challenge 2021. Also to update our data retention and deletion policy.

V4: Updated to include information about the Bulk Registration Tool for National Cipher Challenge 2021

V3: Rewritten to accommodate changes in data regime

V2: Deletion date in Personal Data section corrected to read 27/09/2020 in place of 27/09/202

Data collection policy revised to remove reference to schools, simplified gender reporting and the use of aggregate data in diversity reporting.

Data controller: University of Southampton

Information Asset: National Cipher Challenge database

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

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.

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
National Cipher Challenge
School of Mathematical Sciences
University of Southampton
Highfield Southampton
SO17 1BJ
or by email to cipher@soton.ac.uk
5. With the exception of the Leader Boards, your competition entries and scores and material you post on the Forum, if any, the data you share with us will be deleted within one year of the end of the competition.

Personal Data

Users who register for the competition in Autumn 2024 are required to provide information in line with the version 7 of this policy dated 18/09/2024

The standard registration form

All new standard users are asked to provide a username, not their real name, together with a screen name, a team name, a password and three security questions in case of the need to reset the password. Competitors are reminded not to include any personal information in the published data.

On registration all participants are asked to volunteer their gender with the options male, female, neither and prefer not to say, and their age. This information is not associated with the individual account and is used only in aggregate with all other entries to monitor diversity. Given that the competition usually attracts entries from over 1,000 registrations this is expected to provide reasonable anonymity for the data. If that is not the case then the data will be aggregated with the aggregate diversity data from other years to ensure the required level of anonymity.

Registrants are also asked to provide a school name and town. These are associated with the account but the account does not store any additional identifying personal information.

Registered participants can update the information associated with their account from their account pages on the website.

Competition winners

In the interest of transparency and fairness, competition prize winners are required to allow us to publish their names and school affiliations on the competition website as a condition of being awarded the prize. We will also ask for permission to publish this information as a press release, but this is not a requirement.

The teacher registration form

In order to allow teachers to register multiple teams and for us to deal with queries via email the teacher registration form asks teachers to submit their name and an email address where they can be reached. Unlike standard accounts this is personally identifiable information which will be recorded in our database and retained for the duration of the competition and beyond, in line with our data retention policy. It will only be used in order to carry out the functions of the National Cipher Challenge and will not be shared with others outside the competition. It will not be published by the competition without written authorisation.

The bulk registration tool: Teachers are invited to register teams and individuals using the bulk registration tool. Unlike previous versions of the system we no longer ask for the name and email address details for team captains. It is left to teachers to communicate the registration information to pupils. We have taken this step to further harden our confidentiality provisions for younger users. All team information for bulk registered teams is governed by the data collection rules described above for standard account registration.

Team monitoring Those with registered teacher accounts are given a private PIN number which they can distribute to Team Captains in their school. If the Captains choose to enter that PIN in their team details then the teacher account holder will be able to see the scores and feedback for those teams and to administer the teams. Since the account pages do not contain personally identifying information and control over monitoring rests with team captains we do not believe that this weakens our privacy provisions.

How we store and secure the data

The data is stored in a secure database managed by 10 Degrees as part of their WordPress deployment. It is hosted by WP Engine and protected by Cloudflare in compliance with the GDPR regulations. The system is audited annually for security by Netcraft.

Who has access to the data

Access to the information in the database content is controlled by 2 factor authentication 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 about individuals will only be used 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. Data held in aggregate may also be used in our diversity reporting.

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 forum associated with the competition will automatically publish screen 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, or sooner if you request this in writing, the 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.