This privacy notice applies to current students and applicants who have accepted offers from Pembroke College

A summary of what this notice explains

Pembroke College is committed to protecting the privacy and security of personal data.

This notice explains what personal data Pembroke College holds about you, how we use it internally, how we share it, how long we keep it and what your legal rights are in relation to it.

For the parts of your personal data that you supply to us, this notice also explains the basis on which you are required or requested to provide the information. For the parts of your personal data that we generate about you, or that we receive from others, it explains the source of the data.

There are some instances where we process your personal data on the basis of your consent. This notice sets out the categories and purposes of data where your consent is needed.

Pembroke College has also published separate notices, which are applicable to other groups and activities. Those notices may also apply to you, depending on your circumstances, and it is important that you read this privacy notice together with other applicable privacy notices:

1. applicants and prospective students
2. alumni and donors (including what financial information we hold about our alumni and how we use it when considering fundraising initiatives)
3. archives (which explains what data we hold about former students in our archive)
4. security, maintenance and health and safety (including how we use CCTV)
5. website and cookies (including how we monitor use of our website)
6. IT systems (including how we monitor internet and email usage)
7. Staff (which may be relevant for example if you are a graduate student or tutor)

What is your personal data and how does the law regulate our use of it?

“Personal data” is information relating to you as a living, identifiable individual. We refer to this as “your data”.

“Processing” your data includes various operations that may be carried out on your data, including collecting, recording, organising, using, disclosing, storing and deleting it.
Data protection law requires us:

- To process your data in a lawful, fair and transparent way;
- To only collect your data for explicit and legitimate purposes;
- To only collect data that is relevant, and limited to the purpose(s) we have told you about;
- To ensure that your data is accurate and up to date;
- To ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- To ensure that appropriate security measures are used to protect your data.

Pembroke’s Contact Details

The College has a Data Protection Officer, whose contact details are: Mr Jeremy Bennett, Bursar, Pembroke College, Oxford. OX1 1DW. Email: DPO@pmb.ox.ac.uk

Data that you provide to us and the possible consequences of you not providing it

The provision of most data that you provide to us is a contractual requirement. If you do not provide us with information that you are contractually obliged to provide, the consequences will depend on the particular circumstances. In some cases we may not be able to provide you with certain services; in other cases, this could result in disciplinary action or the termination of your contract.

Other sources of your data

Apart from the data that you provide to us, we may also process data about you from a range of sources. These include:

- Data that we and our staff generate about you, such as during tutorials and in connection with your attendance and accommodation at Pembroke College;
- The University of Oxford, which operates a number of systems that Colleges have access to, including access your examination results, fees outstanding, degree ceremony bookings, emergency contact details, student loan status, “right to work” checks and visa information, disability information and reports by supervisors;
- Your school or previous educational establishments or employers if they provide references to us;
- Fellow students, family members, friends, visitors to Pembroke College and other contacts who may provide us with information about you if and when they contact us, or vice versa.
• Medical and social care professionals
• Financial organisations
• Law enforcement and government authorities

The lawful basis on which we process your data

The law requires that we provide you with information about the lawful basis on which we process your personal data, and for what purposes.

Most commonly, we will process your data on the following lawful grounds:

• Where it is necessary to perform the contract we have entered into with you;
• Where it is necessary for the performance of a task in the public interest;
• Where it is necessary to comply with a legal obligation;
• Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your data, typically in an emergency, where this is necessary to protect your vital interests, or someone else’s vital interests. In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent.

How we apply further protection in the case of “Special Categories” of personal data

“Special categories” of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.

The Special Categories of personal data consist of data revealing:

• racial or ethnic origin;
• political opinions;
• religious or philosophical beliefs;
• trade union membership.

They also consist of the processing of:

• genetic data;
• biometric data for the purpose of uniquely identifying someone;
• data concerning health;
• data concerning someone’s sex life or sexual orientation.
We may process special categories of personal data in the following circumstances:

- With your explicit written consent; or
- Where it is necessary in the substantial public interest, in particular:
  - is necessary for the purposes of the prevention or detection of an unlawful act, must be carried out without the consent of the data subject so as not to prejudice those purposes; or
  - for equal opportunities monitoring;
- Where the processing is necessary for archiving purposes in the public interest, or for scientific or historical research purposes, or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law.

We have in place an appropriate policy document and/or other safeguards which we are required by law to maintain when processing such data.

Less commonly, we may process this type of data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the data public.

*Criminal convictions and allegations of criminal activity*

Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. We may process such data on the same grounds as those identified for "special categories" referred to above.

**Details of our processing activities, including our lawful basis for processing**

We have prepared a detailed table setting out the processing activities that we undertake, the source of the data, the reasons why we process it, how long we keep it and the lawful basis we rely on.

The table includes detailed information about how and why we process various categories of data, and the related lawful basis including:

- Details of which course you are studying
- Other data that is necessary to the operation of the Pembroke College/student contract or to the functioning of Pembroke College including:
  - any data about you contained in your assessed work, our assessments of your work and details of any qualifications you are awarded;
  - details of any disciplinary complaints or decisions about you;
• your contact and accommodation details;
• any communications you have with us, and any communications we generate about you, for example if you ask us to defer your studies to a later academic year;
• details of any payments that you make to us, including your bank/payment card details.

- Data you and others sent us when you applied to us (including information sent to us via UCAS and your predicted grades). This includes your academic record and personal statement which we use to assess your application;
- Details of any relevant criminal convictions, allegations or charges that we ask you to declare to us either when you apply to us, or whilst you are a student, or which are reported to us, and of any Disclosure and Barring Service checks that we request. Relevant criminal convictions or charges are those that indicate an applicant or student might pose an unacceptable risk to other students or staff.

More information is available for undergraduate admissions at: https://www.ox.ac.uk/admissions/undergraduate/applying-to-oxford/decisions/criminal-convictions?wssl=1
And for graduate admissions at: https://www.ox.ac.uk/admissions/graduate/applying-to-oxford/university-policies/criminal-convictions?wssl=1.

- Information that you voluntarily provide to us about any disabilities or health conditions you have, and about your age, ethnicity, gender, religion and belief, and/or sexual orientation. You may also provide this information to us as part of the equality monitoring that we undertake pursuant to our legal obligations under the Equality Act 2010.
- Where you inform us of a health condition or disability, we will take this information into account when considering whether to make a reasonable adjustment under equality law and in other cases where we are legally required to.
- Data about you that we have to collect by law (for example where UK immigration law requires us to record information about you, or to report it to the immigration authorities);
- Data that we voluntarily provide about you, either whilst you are a student or after you graduate, for example if you ask us for a reference.
- Bank and other payment details, where we need to reimburse you, or where you provide such details to us when making a payment.

How we share your data
We will not sell your data to third parties. We will only share it with third parties if we are allowed or required to do so by law. This includes for example:

- where we are required to report information about students that are subject to visa controls to UK Visas and Immigration;
- where we are required to report information to the University of Oxford in order for it to fulfil its obligations to report information to the Higher Education Statistics Agency or its successor body in order to comply with regulatory obligations;
- where we decide to report alleged criminal misconduct to the police;

It also includes disclosures where the third party is an agent or service provider appointed by the Pembroke College to enable us to operate effectively, provided we are satisfied that appropriate safeguards have been put in place to ensure adequate levels of security for your data. All our third party service providers are required to take appropriate security measures to protect your personal information in line with our policies, and are only permitted to process your personal data for specific purposes in accordance with our instructions. We do not allow our third party providers to use your personal data for their own purposes.

More information on the categories of recipients of your data is set out below.

**Automated decision-making**

We do not envisage that any decisions will be taken about you based solely on automated means, however we will notify you in writing if this position changes.

**Sharing your data outside the European Union**

The law provides various further safeguards where data is transferred outside of the EU.

When you are resident outside the EU in a country where there is no “adequacy decision” by the European Commission, and an alternative safeguard is not available, we may still transfer data to you which is necessary for performance of your contract with us, or to take pre-contractual measures at your request.

We will not transfer your data outside the European Union without first notifying you of our intentions and of the safeguards that apply to your data.

**How long we keep your data**
The detailed table of processing activities explains how long we will keep your data. In some cases student data is retained permanently for archiving and/or research purposes, as explained in the table. Pembroke College’s Archives privacy notice has further detail about the information retained in the archive and your rights when data is archived.

Please note that we may keep anonymised statistical data indefinitely, but you cannot be identified from such data.

Your legal rights over your data

Subject to certain conditions set out in UK data protection law, you have:

- The right to request access to a copy of your data, as well as to be informed of various information about how your data is being used;
- The right to have any inaccuracies in your data corrected, which may include the right to have any incomplete data completed;
- The right to have your personal data erased in certain circumstances;
- The right to have the processing of your data suspended, for example if you want us to establish the accuracy of the data we are processing.
- The right to receive a copy of data you have provided to us, and have that transmitted to another data controller (for example, another University or College).
- The right to object to any direct marketing (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- The right to object to the processing of your information if we are relying on a “legitimate interest” for the processing or where the processing is necessary for the performance of a task carried out in the public interest. The lawful basis for any particular processing activity we carry out is set out below in our detailed table of processing activities.
- The right to object to any automated decision-making about you which produces legal effects or otherwise significantly affects you.
- Where the lawful basis for processing your data is consent, you have the right to withdraw your consent at any time. When you tell us you wish to exercise your right, we will stop further processing of such data. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent. You may withdraw your consent by contacting Mr Jeremy Bennett, Bursar, Pembroke College, Oxford, OX1 1DW. Email: DPO@pmb.ox.ac.uk
Further guidance on your rights is available from the Information Commissioner’s Office (https://ico.org.uk/). You may also wish to contact Jeremy Bennett, Bursar, Pembroke College, Oxford. OX1 1DW,(DPO@pmb.ox.ac.uk) if you are considering how or whether to exercise your rights.

You have the right to complain to the UK’s supervisory office for data protection, the Information Commissioner’s Office if you believe that your data has been processed unlawfully.

Future changes to this privacy notice, and previous versions

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes, if the University makes changes to its procedures, or to make Pembroke College’s operations and procedures more efficient. If the change is material, we will give you not less than two months’ notice of the change so that you can decide whether to exercise your rights, if appropriate, before the change comes into effect.

We will notify you of the change by email and via the student intranet.

Version control: V.1.0 (May 2018)
<table>
<thead>
<tr>
<th>Nr.</th>
<th>Category of personal data</th>
<th>Source of the data</th>
<th>Why we process it</th>
<th>How long we keep it</th>
<th>Our lawful basis for processing</th>
<th>Special category details of public interest see annex 2 (where applicable)</th>
<th>Criminal conviction/criminal allegation grounds (where applicable)</th>
<th>Exceptional conditions/criminal conviction grounds (further information)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Your dates of attendance, course of study and outcome of your studies, results of College examinations (“collections”), University examinations, and College and University assessments, awards, scholarships and prizes won. Records of your student status, including whether you are on the visiting student programme and whether you are a full-time or part-time student. Records of your name, gender/preferred title, official (administration) passport style photograph.</td>
<td>We generate this data about you; We obtain this data from the University of Oxford.</td>
<td>We do that we have a record of your results, as a record of your academic progress and if we are asked for a reference or verification of your attendance. So that we can administer and provide your course.</td>
<td>Permanently.</td>
<td>Processing is necessary for performance of our contract with you.</td>
<td>The College has a legitimate interest in promoting this data so that it can deliver your course.</td>
<td>N/A.</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Information about your health, dietary requirements and/or disabilities, and records of decisions we make taking that information into account.</td>
<td>We obtain this data from you; We obtain this data from third parties, such as medical professionals that you tell to provide us with information.</td>
<td>We consider what reasonable adjustments to make to our provision of accommodation, catering or teaching or we need to take account of any dietary requirements you have (whether for medical or belief reasons), or where there is a medical emergency, and any decisions that we take as a result.</td>
<td>4 years after the end of the academic year we considered you to be a registered student.</td>
<td>Processing is necessary for the purposes of our or someone else’s legitimate interests, except where overridden by your data protection rights and freedoms.</td>
<td>The College has a legitimate interest in taking such information into account when it makes decisions that may affect your health, wellbeing or ability to participate.</td>
<td>N/A.</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Information about your ethnicity, race, religion or philosophical belief and/or any medical conditions that may affect your health, wellbeing or ability to participate, including records of student self-assessment.</td>
<td>We obtain this data from you; We obtain this data from the University of Oxford.</td>
<td>The College has a legitimate interest in promoting or maintaining equality of opportunity or treatment, with a view to enabling such equality to be promoted or maintained.</td>
<td>Permanently.</td>
<td>Processing is necessary for the purposes of our or someone else’s legitimate interests, except where overridden by your data protection rights and freedoms.</td>
<td>The College has a legitimate interest in taking such information into account when it makes decisions that may affect your health, wellbeing or ability to participate.</td>
<td>N/A.</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Records of student performance and attendance, including records of student self-assessment.</td>
<td>We obtain this data from you; We generate this data about you.</td>
<td>To help develop and guide you during your studies, our tutors monitor and assess your progress in tutorials, including your written work, provide feedback and may ask you to self-assess your progress.</td>
<td>Permanently.</td>
<td>Processing is necessary for performance of our contract with you.</td>
<td>The College has a legitimate interest in promoting this data so that it can deliver your course.</td>
<td>N/A.</td>
<td></td>
</tr>
<tr>
<td>Records of requests for assistance with academic matters, such as applications for special examination arrangements, requests for extensions to deadlines and submissions of late coursework submissions. Decision making about such requests and records of action taken.</td>
<td>We obtain this data from you. To process this information and make decisions about you when you ask us to, and in accordance with the College’s policies relating to such requests.</td>
<td>Processing is necessary for performance of our contract with you. Processing is necessary for the prevention of a breach of its obligations under the Equality Act 2010. This processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning equality and to make reasonable adjustments. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Requests for assistance with academic matters, such as applications for special examination arrangements, requests for extensions to deadlines and submissions of late coursework submissions. Decision making about such requests and records of action taken.</td>
<td>We obtain this data from you. To process this information and make decisions about you when you ask us to, and in accordance with the College’s policies relating to such requests.</td>
<td>Processing is necessary for performance of our contract with you. Processing is necessary for the prevention of a breach of its obligations under the Equality Act 2010. This processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning equality and to make reasonable adjustments. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Records relating to your accommodation, such as tenancy agreements, tenancy agreements for students and employees of the College, records of your accommodation inventory and of the condition/cleanliness of your accommodation throughout your occupancy.</td>
<td>We generate this data about you.</td>
<td>Processing is necessary for performance of our contract with you. Processing is necessary for the performance of a task carried out in the public interest. Processing is necessary for compliance with a legal obligation. The College has a legitimate interest in ensuring that such requests for assistance are considered pursuant to its procedures and in accordance with relevant legislation.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Records of student helpers-hosts at open days, records of requests and bookings for rooms for visiting speakers.</td>
<td>We obtain this data from you. To ensure that freedom of speech within the law is secured for visiting speakers.</td>
<td>Processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning freedom of speech within the law. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Records of student helpers-hosts at open days, records of requests and bookings for rooms for visiting speakers.</td>
<td>We obtain this data from you. To ensure that freedom of speech within the law is secured for visiting speakers.</td>
<td>Processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning freedom of speech within the law. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Details of your tenancy or licence agreements, including the duration of your occupancy, payments you have made and decisions about your accommodation, applications and room allocation.</td>
<td>We obtain this data from you. To ensure that freedom of speech within the law is secured for visiting speakers.</td>
<td>Processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning freedom of speech within the law. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Details of your tenancy or licence agreements, including the duration of your occupancy, payments you have made and decisions about your accommodation, applications and room allocation.</td>
<td>We obtain this data from you. To ensure that freedom of speech within the law is secured for visiting speakers.</td>
<td>Processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning freedom of speech within the law. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other records relating to your accommodation, for example your contact information, accommodation requests and payments, lease agreements for students and guests, records of any family members or dependants who occupy the accommodation, records of overnight guests, rental of fridges, records of your accommodation inventory and of the condition/cleanliness of your accommodation throughout your occupancy.</td>
<td>We obtain this data from you. To ensure that freedom of speech within the law is secured for visiting speakers.</td>
<td>Processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning freedom of speech within the law. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other records relating to your accommodation, for example your contact information, accommodation requests and payments, lease agreements for students and guests, records of any family members or dependants who occupy the accommodation, records of overnight guests, rental of fridges, records of your accommodation inventory and of the condition/cleanliness of your accommodation throughout your occupancy.</td>
<td>We obtain this data from you. To ensure that freedom of speech within the law is secured for visiting speakers.</td>
<td>Processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning freedom of speech within the law. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Records of requests and bookings for rooms and facilities for events held by the College. Records of student visitors.</td>
<td>We obtain this data from you. To ensure that freedom of speech within the law is secured for visiting speakers.</td>
<td>Processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning freedom of speech within the law. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>Information about you submitted to UCAS such as your name, address, education qualifications and details of any criminal convictions.</td>
<td>We obtain this data from you.</td>
<td>In order to process your application and to inform you when you have been offered a place.</td>
<td>Records relating to criminal convictions will be retained for six months after the date on which you were offered a place.</td>
<td>The University has a legitimate interest in collecting this data.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Details relating to invoicing and payment (including payment information such as credit card details).</td>
<td>We collect fees due to the University on its behalf and account to it for such fees.</td>
<td>So that the College is able to provide a reference to its students and former students.</td>
<td>In order to provide your course, accommodation and associated services.</td>
<td>The University has a legitimate interest in collecting this data.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Information that you submitted to UCAS and/or details obtained from references and colleges about you.</td>
<td>We obtain this data from you.</td>
<td>In order to provide your course, accommodation and associated services.</td>
<td>Records of outstanding payments will be retained and they are paid in full.</td>
<td>The University has a legitimate interest in collecting this data.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Information about you submitted to UCAS such as your name, address, education qualifications and details of any criminal convictions.</td>
<td>We obtain this data from the University of Oxford.</td>
<td>In order to process your application and to inform you when you have been offered a place.</td>
<td>Where criminal convictions, incidents or allegations are declared or reported to us, we will store this data permanently.</td>
<td>The University has a legitimate interest in collecting this data.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>Details of any criminal records that you disclosed to us on your application, or during your studies, or of any criminal incidents or allegations concerning you reported to us by anyone else.</td>
<td>We obtain this data from you.</td>
<td>In order to provide your course, accommodation and associated services.</td>
<td>Where allegations are declared or reported to us, we will store this data permanently.</td>
<td>The University has a legitimate interest in collecting this data.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>Information that you submitted to UCAS such as your name, address, education qualifications and details of any criminal convictions.</td>
<td>We obtain this data from you.</td>
<td>In order to process your application and to inform you when you have been offered a place.</td>
<td>Where allegations are declared or reported to us, we will store this data permanently.</td>
<td>The University has a legitimate interest in collecting this data.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Your fee status (e.g. home, EU, or international) and associated information about your country of residence, the amount of your fees and funding information including your financial declaration, details of any guarantor from parents or others, any supporting information you provide about funding (e.g. loans, grants, alternative and/or self-funding means, including copies of evidence you supply) and decisions that we make in light of that information.

We obtain this data from the University of Oxford.

In order to determine the fees you are required to pay and to confirm that you will be able to meet the requirements to pay fees.

We retain this data for 6 years after the end of the academic year when you cease to be a registered student.

Processing is necessary for performance of our contract with you.

Processing is necessary for the purposes of our or someone else’s legitimate interests, except where overridden by your data protection rights and freedoms.

Processing is necessary for compliance with a legal obligation.

Aggregation determines to an extend the level of fees you are required to pay, based on your country of residence.

The College has a legitimate interest in being able to satisfy itself that students have appropriate arrangements in place to meet the costs of their course and living expenses.

16. Disciplinary, harassment or grievance records of students, staff or others, and records of complaints or cases involving students, staff or others. We obtain this data from you, from the University of Oxford, from third parties (e.g. parents, sponsors, guarantors).

The College has a legitimate interest in maintaining a record of any potential records of discipline, harassment, grievance or other complaints recorded or issued in connection with disciplinary or grievance procedures.

We generate this data about you.

Records will be retained within College archives permanently.

Processing is necessary for the purposes of our or someone else’s legitimate interests, except where overridden by your data protection rights and freedoms.

The College has a legitimate interest in maintaining a record of its cultural life, including for researchers and future students.

17. Attendances and absences

We retain this data from you.

In order to plan and provide catering services to students and to record them correctly for the purpose provided.

We retain this data for 6 years from the date generated for compliance with legal obligations.

Processing is necessary for performance of our contract with you.

Processing is necessary for compliance with a legal obligation.

Substantial public interest under the UK Data Protection Act 2018

18. Records of College cultural life (photographs and written records of events, choirs, clubs and societies, plays and performances, participation in events and sporting events and end of the outcomes.

We retain this data from you.

In order to allow the College’s cultural life to function and flourish, and in order to maintain a record of College life, which may be relevant to you individually (for example if you later request a reference from us) and which is also part of the College’s own archive record of what its members have achieved over time.

Records will be retained within College archives permanently.

Processing is necessary to the purposes of our or someone else’s legitimate interests, except where overridden by your data protection rights and freedoms.

The College has a legitimate interest in maintaining a record of its cultural life, including for researchers and future students.

19. Special category data (for example the details of special educational needs or learning disabilities)

We retain this data from you.

In order to provide reasonable adjustments for students with learning disabilities and to meet legal and regulatory requirements.

Special records will be retained for a period of 6 years from the date generated for compliance with legal obligations and for the data to be retained for a longer period (for example in connection with legal advice, or in relation to auditing obligations).

Processing is necessary for the purposes of our or someone else’s legitimate interests, except where overridden by your data protection rights and freedoms.

Processing is necessary for compliance with a legal obligation.

Substantial public interest under the UK Data Protection Act 2018

20. Data for arranging cultural events abroad.

We retain this data from you.

Where the College organises an event abroad (for example a College Choir event).

We retain this data for 6 months after the date on which you return from the overseas event.

Processing is necessary for the purposes of our or someone else’s legitimate interests, except where overridden by your data protection rights and freedoms.

The College has a legitimate interest in arranging cultural events abroad.

Aggregation determines to an extend the level of fees you are required to pay, based on your country of residence.
### Information and copies of records confirming contractual terms and conditions

<table>
<thead>
<tr>
<th>Information/Records</th>
<th>Source/Method</th>
<th>Duration After End of Academic Year</th>
<th>Processing Necessary For</th>
</tr>
</thead>
<tbody>
<tr>
<td>Records of attendance and participation in College</td>
<td>Obtain the data from the University of Oxford where it is held; in internal communications, we may record attendance of student members on certain committees.</td>
<td>6 years</td>
<td>Performance of our contract with you; Compliance with a legal obligation; Legitimate interests, except where overridden by your data protection rights; Compliance with the requirements of UK Visas and Immigration law.</td>
</tr>
<tr>
<td>Minutes and in internal communications</td>
<td></td>
<td></td>
<td>For the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights.</td>
</tr>
</tbody>
</table>

### Emergency contact details

<table>
<thead>
<tr>
<th>Information/Records</th>
<th>Source/Method</th>
<th>Duration After End of Academic Year</th>
<th>Processing Necessary For</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contacts generated in the event of an emergency</td>
<td>Obtain the data from you</td>
<td>6 years after the end of the academic year</td>
<td>Performance necessary for our performance of our contract with you.</td>
</tr>
</tbody>
</table>

### Contextual admissions information for undergraduate admissions

<table>
<thead>
<tr>
<th>Information/Records</th>
<th>Source/Method</th>
<th>Duration After End of Academic Year</th>
<th>Processing Necessary For</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information about your school performance, postcode and care background</td>
<td>Obtain the data from you</td>
<td>6 years after the end of the academic year</td>
<td>Performance necessary for our performance of our contract with you; Compliance with a legal obligation; Legitimate interests, except where overridden by your data protection rights and freedoms.</td>
</tr>
</tbody>
</table>

### College committee meetings

<table>
<thead>
<tr>
<th>Information/Records</th>
<th>Source/Method</th>
<th>Duration After End of Academic Year</th>
<th>Processing Necessary For</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minutes and in internal communications</td>
<td>Obtain the data from you</td>
<td></td>
<td>Performance necessary for our performance of our contract with you; Compliance with a legal obligation; Legitimate interests, except where overridden by your data protection rights and freedoms.</td>
</tr>
</tbody>
</table>

### Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights

- Performance of our contract with you
- Compliance with a legal obligation
- Legitimate interests
- Compliance with the requirements of UK Visas and Immigration law

### Data obtained from students

- Immigration law.
- Under relevant legislation the University is required to adhere to the agreement it has with the Office for Fair Access / Office for Students, which includes the use of contextual data in the undergraduate admissions process.

### Data obtained from students

- Immigration law.
- Under relevant legislation the University is required to adhere to the agreement it has with the Office for Fair Access / Office for Students, which includes the use of contextual data in the undergraduate admissions process.

---

** Explicit consent:**

In the case of right to work information, the processing is necessary for the College to comply with the requirements of UK Visas and Immigration law.

---

**Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms:**

- Performance of our contract with you
- Compliance with a legal obligation
- Legitimate interests
- Compliance with the requirements of UK Visas and Immigration law
26 Applications for and decisions about financial support (see 29), bursaries and hardship funds. This includes communications that we send and receive to third parties that provide financial support.

- We obtain this data from you
- We generate this data about you
- In order to make decisions about financial support and to ensure that the College is encouraging and supporting participation by talented people from all backgrounds.
- For 6 years after the end of the academic year you cease to be a registered student

Processing is necessary for the purposes of our or someone else’s legitimate interests, except where overridden by your data protection rights and freedoms.

The College has a legitimate interest in receiving, considering and making decisions about financial support in the interests of its students.

27 Records relating to degree ceremonies; attendees, catering requirements, names of your guests.

- We obtain this data from you
- We generate this data about you
- In order to provide and operate degree ceremonies.
- These records will be retained for one year from the date on which the ceremony took place.

Processing is necessary for performance of our contract with you.

28 Records concerning nominations and decisions to confer prizes, scholarships and awards, where third party donors are not involved.

- We obtain this data from you
- We generate this data about you
- In order to decide who is to receive scholarships, awards or prizes.
- Permanently.

Processing is necessary for the purposes of our or someone else’s legitimate interests, except where overridden by your data protection rights and freedoms.

29 Records concerning nominations and decisions to confer prizes, scholarships and awards from third party donors.

- We obtain this data from you
- We generate this data about you; We receive this information from third party donors.
- In order to decide who is to receive scholarships, awards or prizes.
- Permanently.
- We will only share your information with such a donor with your consent.

30 Student debtor records and records of debts recovered, records of decisions we take about debts.

- We generate this data about you
- To operate College library facilities.
- These records will be retained for a period of one year from the date of closure of your library account.

Processing is necessary for performance of our contract with you.

Processing is necessary for the purposes of our or someone else’s legitimate interests, except where overridden by your data protection rights and freedoms.

31 Library access and book records, overdue book records, records of library cards and library fines.

- We generate this data about you
- To operate College library facilities.
- These records will be retained for a period of one year from the date of closure of your library account.

Processing is necessary for performance of our contract with you.

Processing is necessary for the purposes of our or someone else’s legitimate interests, except where overridden by your data protection rights and freedoms.
5. We obtain and process information about you for marketing and administrative purposes, such as photographs of College events, records of any students that participate in outreach activity, and outreach materials, such as photographs of College life.

6. We obtain and process information about you for the purposes of our or someone else’s legal interests, which are overridden by your data protection rights and freedoms.

7. We obtain and process information about you for archiving purposes.

8. We obtain and process information about you for the purposes of legal claims.

9. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which provides safeguards by making specific provisions preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

10. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

11. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

12. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

13. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

14. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

15. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

16. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which provides safeguards by making specific provisions preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

17. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

18. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

19. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

20. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

21. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

22. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

23. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

24. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

25. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

26. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

27. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

28. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

29. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

30. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

31. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

32. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

33. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

34. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

35. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

36. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

37. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

38. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.

39. We obtain and process information about you for the purposes of measures or procedures preventing processing which is likely to cause substantial damage or substantial distress to a data subject, and/or which is carried out for the purposes of measures or procedures with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved research.
| We generate this data about you | When we are asked to provide a reference for you | Where we are asked to provide a reference for you | Copies of references will be kept for six years from the date of provision of the reference. An entry noting that a reference was provided will be retained on your permanent record. | Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms | The College, its students and the recipients of references have a legitimate interest in providing and receiving references. |