# This privacy notice applies to attendees, organisers and others involved in Pembroke College conferences and events

# 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 attendees, organisers and others involved in conferences and events ("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 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. current students
- 2. current staff, office holders and senior members
- 3. archives (which explains what data we hold 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)

#### 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".

Data protection law requires Pembroke College ("us" or "we"), as data controller for your data:

• 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 College's Contact Details**

If you need to contact us about your data, please contact: conferences@pmb.ox.ac.uk.

## What personal data we hold about you and how we use it

We may hold and use a range of data about you at different stages of our relationship with you. We might receive this data from you; we might create it ourselves, or we might receive it from someone else (for example if someone provides us with a reference about you).

Categories of data that we collect, store and use include (but are not limited to):

- Contact details that you provide to us, including names, addresses and telephone numbers.
- Details of event organisers and guests, including details of organisations represented and event purpose.
- Financial information including your details of invoicing and outstanding payments (including payment information such as credit card or banking payment information) for facilities and services provided by the College at your request.
- Room and meal booking information, including any medical issues and/or disabilities that you have notified to us.
- Dietary requirements
- Photographs, audio and video recording of events (where applicable).
- Computing and email information, including Guest login information (IP address(es), devices connected, traffic monitoring data).
- Religious beliefs (if relevant)

Further categories of data that we hold in relation to attendees, organisers and others involved in conferences and events are set out below in our Record of Processing Activity.

#### 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 purpose(s).

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 to comply with a legal obligation;
- Where it is necessary for the performance of a task in the public interest;
- 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 personal information, 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 information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information.

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 information in the following circumstances:

- With your explicit written consent; or
- Where it is necessary in the substantial public interest, in particular:
  - for the exercise of a function conferred on Pembroke College or anyone else
     by an enactment or rule of law; or
  - o 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 appropriate policy documents and/or other safeguards which we are required by law to maintain when processing such data.

Less commonly, we may process this type of information 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 information 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

Details of the lawful bases we rely on for the processing of the categories of data that we hold in relation to conferences and events are set out in our Record of Processing Activity. Details of retention periods, plus details of parties to whom we transfer data, and on what basis, are available below.

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

Most data that you provide to us is processed by us in order that we, and you, can each fulfil our contractual obligations and/or comply with obligations imposed by law. For example:

- Financial information, as listed above, must be provided as part of any contract between us for the provision of services or access to facilities.
- Details of event organisers and guests, including details of organisations represented and event purpose must be provided to us under the contract in place between us, in

order that we can properly manage Pembroke College's facilities and ensure that our facilities are not used to further illegal or inappropriate aims.

The consequences for any failure to provide such data will depend on the particular circumstances. For example, a failure to provide the relevant financial information will mean that we are unable to process any payment from you and may not be able to enter into the relevant contract with you. A failure to provide accurate organisation and purpose details for events may mean that we choose not to enter into the relevant contract with you, or that an event in progress is not permitted to continue.

Some data that you give to us is provided on a wholly voluntary basis – you have a choice whether to do so. Examples include:

- Disability and health condition information, which you may choose to provide to us in order that we can take this information into account when allocating appropriate accommodation to you.
- Religious beliefs, which you may choose to provide to us if you have any special requirements.

# 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 generate about you, such as when communicating with you, receiving your requests, orders and/or payments;
- Guests attending the relevant conference and/or event;
- Third parties with an interest in the activities of your organisation;

Our Record of Processing Activity (below) indicates the sources of each of the various categories of data that we process.

#### How we share your data

We do not, and will not, sell your data to third parties. We will only share it with third parties external to the collegiate University, if we are allowed or required to do so by law.

Examples of bodies to whom we are required by law to disclose certain data include, but are not limited to:

Organisation	Why?
Agencies with responsibilities for the prevention and detection of crime, apprehension and prosecution of offenders.	For the prevention, detection or investigation of crime, for the location and/or apprehension of offenders, and/or for the protection of the public (in cases where there is a duty on us to report).
HM Revenue & Customs (HMRC)	Invoicing information to the extent required to fulfil Pembroke College's tax reporting obligations.

Examples of bodies to whom we may voluntarily disclose data, in appropriate circumstances, include but are not limited to:

Organisation	Why?
Other Colleges and/or PPH's within the University of Oxford	Where events are progressed on a joint basis.
Third party service providers	To facilitate activities of Pembroke College. Any transfer will be subject to an appropriate, formal agreement between Pembroke College and the processor.
Agencies with responsibilities for the prevention and detection of crime, apprehension and prosecution of offenders.	For the prevention, detection or investigation of crime, for the location and/or apprehension of offenders, and/or for the protection of the public.

Where information is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

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 extensive information on the categories of recipients of your data is set out here.

### **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. Pembroke College Conference & Events Privacy Notice

Otherwise, 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.

## **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.

# How long we keep your data

We retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements.

Details of expected retention periods for the different categories of your personal information that we hold are set out in our Record of Processing Activity.

Retention periods may increase as a result of legislative changes, e.g. an increase in limitation periods for legal claims would mean that Pembroke College is required to retain certain categories of personal data for longer. Any such changes will be reflected in updated versions of our Record of Processing Activity.

If there are legal proceedings, a regulatory, disciplinary or criminal investigation, suspected criminal activity, or relevant requests under data protection or freedom of information legislation, it may be necessary for us to suspend the deletion of data until the proceedings, investigation or request have been fully disposed of.

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 and exception 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 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. 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 the Pembroke College Data Protection Officer
  at <a href="mailto:DPO@pmb.ox.ac.uk">DPO@pmb.ox.ac.uk</a>

If you wish to exercise any of your rights in relation to your data as processed by Pembroke College please contact our Data Protection Officer at <a href="mailto:DPO@pmb.ox.ac.uk">DPO@pmb.ox.ac.uk</a>. Some of your rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

Further guidance on your rights is available from the Information Commissioner's Office (<a href="https://.ico.org.uk/">https://.ico.org.uk/</a>). You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office at <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a> if you believe that your data has been processed unlawfully.

#### Future changes to this privacy notice

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes or to make the Pembroke College's or the University'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 exercise your rights, if appropriate, before the change comes into effect.

Version control: V.1.0 (May 2018)

Pembroke College Conference & Events Privacy Notice

Pembroke College Conference & Events Privacy Notice

ID.	Category of personal data	Source of the data	Why we process it	How long we keep this data	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal Conviction Grounds	Criminal conviction grounds (further information)
1	the extent collected, of event attendees, speakers and conference organisers.	someone is organising an event that involves you as a speaker.		relating to alumni, and relevant privacy notice, for further details as to what we hold for alumni). If you have requested addition to our communications lists, in order to be notified of future events and opportunities, we will continue to hold your contact details until you tell us you no longer wish to be contacted or time has passed such that we are no longer certain that you wish to continue to receive messages and we are unable to obtain renewed confirmation from you that you do.	request prior to entering a contract  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	Where you have an expressed an interest in events and conferences, processing is necessary in order to enable us to enter into relevant contracts with you or take relevant preparatory steps. We also have a legitimate interest in processing your personal contact data for the purposes of marketing additional events to you, where appropriate and in line with other regulatory and legislative regimes.			N/A	
2	Security records, including CCTV records, access control records, guest vehicle registrations and records of keys issued. Records of security incidents, accident reports and health and safety records.	We generate this data about you	To monitor the attendance of people on College premises, as part of the College's safety and security arrangements.	CCTV records, access control and access logs are retained for six months. Security incidents, accident reports and health and safety records are retained for 6 years from creation. If incidents are mentioned during Governing Body meetings, the minutes will be retained in the College archive in perpetuity.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	residents have a legitimate	Substantial public interest under the UK Data Protection Act 2018	The College processes special category information in pursuit of our functions and under health and safety legislation, and for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the College or the data subject in connection with employment, social security or social protection.		To the extent that data recorded includes data on criminal offences, convictions and allegations.
3	Records of College events and conferences in which you have expressed an interest, or for which you have registered for and/or attended.	We generate this data about you	To enable the proper management of College events, to ensure that we have an accurate record of attendance at College events and to enable us (where permitted) to inform you of additional events which may be of interest to you. Also, to inform the planning of future events.	(please refer to the record of processing activity	Processing is necessary for performance of our contract with you  Processing is necessary in order to take steps at your request prior to entering a contract  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	To the extent that your attendance is based on a contractual relationship, processing is necessary for the performance of that contract or as part of preparatory steps prior to entering into that contract. For other events, we have a legitimate interest in understanding who will be attending College events for organisational, Health and Safety and similar purposes.  Further, we have a legitimate interest in all cases in recording this information, in order to assess the popularity and impact of College events, plan future events and make details of planned events available to parties likely to be interested in attending (where permitted by relevant regulatory and statutory regimes).	N/A		N/A	

4	requirements and/or disabilities.	We obtain this data from you	When we consider what reasonable adjustments to make, or we need to take account of any dietary requirements you have (whether for medical or belief reasons), when planning for you attendance at events.  So that we have a record of	Data is collated for use in relation to specific events, and is deleted within one year of the event occurring. However, if you are an alum or regular donor or attendee, we may save the information on file in order that it can be referenced and appropriate provision made for you at future events.  This data will be retained for a period of seven	Processing is necessary for	Processing is necessary for compliance with equality law, and/or food safety law. We also have a legitimate interest in ensuring that you receive an appropriate service and treatment in your interactions with us.	Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is complying with obligations under the Equality Act 2010 and/or pursuant to health and safety legislation. The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning equal opportunity and to make reasonable adjustments, and to comply with its health and safety obligations.  Where it processes special category data	N/A  The processing meets a	What it accesses
		about you	information supplied, both in the interests of good administration and also to meet legal and regulatory requirements.	years from the date the record was generated.	compliance with a legal obligation		interest under the UK Data Protection Act 2018	for these purposes, the College is complying with its obligations under legislation. The processing is necessary for reasons of substantial public interest, namely the requirement for the College to comply with its statutory and legal obligations.	condition in Part 2 of Schedule 1 to the Data Protection Act 2018	criminal convictions/allegations data for these purposes, the College is complying with its obligations under legislation. The processing is necessary for reasons of substantial public interest, namely the requirement for the College to comply with its statutory and legal obligations.
6	Opinions and comments made by you on College events, as expressed in communications with the College (to the extent recorded).	We obtain this data from you	The views and concerns of attendees at our events help to guide the planning of future activities.	Comments regarding forthcoming events may be held until the event has occurred. The the extent that they are used to inform the planning of additional events, they may be referenced in College managerial documents and held in the College archives in perpetuity.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We have a legitimate interest in proactively managing our events programme.	N/A		N/A	
7		We obtain this data from you	As part of taking payments (including deposits and balances) for events, providing invoices and pursuing outstanding amounts.	For seven years from the point of invoice. To the extent that payments remain outstanding, retention of the data may be extended to enable recover proceedings to take place.	Processing is necessary for performance of our contract with you.  Processing is necessary in order to take steps at your request prior to entering a contract		N/A		N/A	
8	7	We obtain this data from you	To hold an accurate record of our communications with you.	Correspondence will ordinarily be held for its useful life, and the majority will be deleted within seven years of receipt. However, where the content of communications continues to inform College activity, copies may be kept longer. In addition, correspondence referenced in Governing Body minutes will be added to the College archive in perpetuity.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and	We, and you, have a legitimate interests in the College holding a full record of our correspondence with you, which can be referred back to as required.	N/A		N/A	
9		We generate this data about you	To maintain a record of College events, including entry of materials into the College archive. Images are also used to advertise activities within the College, both internally and externally, in circumstances where any required consents have been obtained.	Photographs taken at events and conferences will be deleted within seven years of the date of the 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 maintaining a record of College life, and in marketing College life, and in marketing College facilities and opportunities.	N/A		N/A	

10	Chapel Office: information relating to individuals who have, or intend to be, married in the College chapel, including names, ages, occupations, marriage dates, and wedding preferences and plans.	We obtain this data from you	To make the College chapel available to current and former staff, students , office-holders, members and others for the purpose of wedding ceremonies.	Details of alumni ceremonies may be noted on the relevant alum files held by the College and held permanently. A skeleton record of ceremonies is held by the College (details of main participants, type of event, dates and times). A register of marriages (which may be held by the Chapel or belong to the Parish Church – St Mary the Virgin) is held permanently.	Processing is necessary for performance of our contract with you  Processing is necessary in order to take steps at your request prior to entering a contract  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We, and you , have a legitimate interest in our recording sufficient data to enable your planned nuptials to proceed. We also have a legitimate interest in recording those details on the College Archive, as part of the record of College life.	N/A		N/A	
11	Conference room bookings (overnight guests), including names, contact details, ages, and disability details.	We obtain this data from you We generate this data about you	As part of the administration and management of College property.	For seven years following the booking. In the event that disputes arise in relation to the booking, we may retain the data for a longer period, until a reasonable period after the dispute is resolved.	Processing is necessary for performance of our contract with you  Processing is necessary in order to take steps at your request prior to entering a contract  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	interest in the proper management of College facilities, in maintaining the security of College premises, in understanding the purposes for which facilities have been reserved, and in recording the identities of those booking College	Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is complying with obligations under the Equality Act 2010 and/or pursuant to health and safety legislation. The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning equal opportunity and to make reasonable adjustments, and to comply with its health and safety obligations.	N/A	
12	Computer and email information, including guest login, username and password information for College IT systems, IP addresses of devices you connect to College IT systems, details of when you connected or logged in to our network, and records of internet usage.	We generate this data about you	For the proper management of College IT resources.	Records will be destroyed after one year.	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	We have a legitimate interest in the proper management of College IT resources.	N/A		N/A	
13	Meal bookings.	We generate this data about you	So that we may provide catering services to guest in accordance with relevant entitlements, and invoice correctly for services provided.		Processing is necessary for performance of our contract with you		N/A		N/A	

14	Records of requests and bookings for	We obtain this data	As part of the management	Where concerns exist in relation to a proposed	Processing is necessary for	Substantial public	Where it processes special category data	The processing meets a	Where it processes
	conferences and events, including	from you	of event bookings and to	event, or one that has occurred, records may be	compliance with a legal	interest under the UK	for these purposes, the College is	condition in Part 2 of	criminal
	records of any decisions the College		comply with our legal	retained for seven years following the date of	obligation	Data Protection Act	exercising functions conferred under the	Schedule 1 to the Data	conviction/allegation da
	makes pursuant to its obligation to take	We generate this data	obligations.	the event. Details of other proposed or actual		2018	the Education (No 2) Act 1986. The	Protection Act 2018	ta for these purposes,
	such steps as are reasonably practicable	about you		events will be held for up to one year.			processing is necessary for reasons		the College is exercising
	to ensure that freedom of speech within	Third party					of substantial public interest, namely that		functions conferred
	the law is secured for members,						the College must comply with its statutory		under the the Education
	students and employees of the College						obligations concerning freedom of speech		(No 2) Act 1986. The
	and for visiting speakers.						within the law.		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