



Global Privacy Notice

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Responsible Committee: Governing Committee

Responsible Officer: Head of Governance

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Summary

Pembroke College is committed to protecting the privacy and security of your personal information. This notice explains how we collect, use, and share your data, and outlines your rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This notice applies primarily to students and members of the college. Other notices may apply to you depending on your relationship with the college, such as those for staff, alumni, or website users.

We are required by law to explain how we use your personal data. This notice tells you how we handle this information and your rights.

1. Introduction

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

This policy 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 document 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:

- Applicants and prospective students
- Alumni and donors (including what financial information we hold about our Alumni and how we use it when considering fundraising initiatives)
- Archives (which explains what data we hold about former students in our archive)
- Security, maintenance and health and safety (including how we use CCTV)
- Website and cookies (including how we monitor use of our website)

- IT systems (including how we monitor internet and email usage)
- Staff (which may be relevant for example if you are a graduate student or tutor)

“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.

2. Provision and Source of Data

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.

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.

3. Data processing

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 process personal data because it is:

- necessary to perform a contract we have entered into with you;
- necessary to comply with a legal obligation;
- necessary for the performance of a task carried out in the public interest; or
- necessary for our legitimate interests (or those of a third party) where these are not overridden by your rights.

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.

"Special categories" of sensitive personal data (for example, information about health, ethnicity, religion, or sexual orientation) require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.

We only process sensitive personal data where one of the following applies:

- you have given explicit consent;
- it is necessary for reasons of substantial public interest (for example, equal opportunities monitoring or the prevention or detection of unlawful acts);
- it is required for archiving, research, or statistical purposes in the public interest; or
- it is needed for the establishment, exercise, or defence of legal claims.

Appropriate policies and safeguards are in place to protect this information, as required by law.

Where we process data relating to criminal convictions or allegations, we do so only under the same strict conditions that apply to special category data.

A record of our processing activities (ROPA), including the lawful bases relied upon and applicable retention periods, can be provided on request.

4. How we share your data

We will not sell your data to third parties. We will only share your information where we are permitted or required to do so by law, or where this is necessary for the operation of College activities. This includes:

- 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;

We also share data with a limited number of trusted service providers who act on our behalf and under our instructions (for example, IT system suppliers, software platforms, and mailing or event services). These providers are required to apply appropriate security measures consistent with our policies and may only process personal data for the purposes specified by the College. They are not permitted to use your personal data for their own purposes. More information about the main categories of recipients of personal data is available upon request.

- **Automated decision-making** – The College does not currently carry out any automated decision-making or profiling with legal or similarly significant effects, and 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 United Kingdom (including the European Union)** - The law provides additional safeguards when personal data is transferred outside the United Kingdom. Where data is transferred to a country or territory covered by a UK adequacy regulation, including those in the European Economic Area (EEA), it is protected by that decision. If data must be transferred to a country without an adequacy regulation and no other safeguard is available, the College may still transfer your data where this is necessary for the performance of your contract with us, or to take pre-contractual steps at your request. We will not transfer your personal data outside the United Kingdom without informing you of the transfer and the safeguards that apply.

5. How long we keep your data

Pembroke College maintains detailed internal records of its processing activities, which include information about how long different categories of personal data are retained and processed. Information about relevant retention periods can be provided upon request.

In some cases, student data is retained permanently for archiving and/or research purposes. Further details about material held in the College Archives, and about your rights in relation to archived data, are set out in the Archives Privacy Notice.

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

6. Your legal rights over your data

Under UK data protection law, you have a number of rights in relation to your personal data. These rights are not absolute and may be subject to certain conditions and exemptions. They include the right to:

- **Access** - 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;
- **Rectification** - The right to have any inaccuracies in your data corrected, which may include the right to have any incomplete data completed;
- **Erase** – The right to have your personal data erased in certain circumstances;
- **Restriction** - 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
- **Data portability** - 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).
- **Object to direct marketing** - 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.
- **Object to processing** - 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 each type of processing is described in our Record of Processing Activities, which is available upon request.

- **Automated decision-making** - The right to object to any automated decision-making about you which produces legal effects or otherwise significantly affects you.
- **Withdrawal of consent** - 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.

If you have any questions about how your personal data is handled or wish to exercise any of your data protection rights, please contact the **Bursar**, who also serves as the College's **Data Protection Officer**, at **DPO@pmb.ox.ac.uk**, or by post at **Pembroke College, Oxford, OX1 1DW**.

Further information about your rights, including your right to lodge a complaint if you are not satisfied with how we have handled your data, is available from the **Information Commissioner's Office** at www.ico.org.uk

7. Changes to this Privacy Notice

Pembroke College may update this notice from time to time, for example to reflect changes in the law, regulatory requirements, or College and University procedures. Any material changes will be communicated in advance, normally by privacy notice updates and via the college intranet.