

## Privacy Notice

### Data Processing activities undertaken by Pembroke College, Oxford, for security and monitoring relating to staff, students and visitors to College premises including CCTV, other security and related processing.

#### Introduction

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

This notice applies anyone who interacts with Pembroke College's security, including the College Lodge and CCTV systems operated by the College - including staff, students and visitors. There are separate privacy notices covering the other aspects of processing of staff, student and others' data, including users of the College website, which are available on Pembroke's website.

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 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.

#### **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 College's Contact Details**

If you need to contact us about your data, please contact our Data Protection Officer: Ms

Julie Saunders, Bursar, Pembroke College, Oxford, OX1 1DW

[DPO@pmb.ox.ac.uk](mailto:DPO@pmb.ox.ac.uk)

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

In most cases the data you provide will be a necessary requirement of entering or living on Pembroke College's premises. If you do not provide such data you may not be able to enter College premises, and, depending on circumstances, this may become a disciplinary matter that could lead to the termination of your contract with us whether you are an employee, or a student.

### **Other sources of your data**

Apart from the data that you provide to us, we may also generate data about you, for example if you use a Pembroke College fob or swipe card to access premises, the College access control system will generate a log of your attendance.

### **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 for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where necessary to comply with a legal obligation;

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.

*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 (below) 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. It includes:

- CCTV monitoring that Pembroke College undertakes to help provide safety and security on College premises, and to assist with the prevention and detection of crime. Pembroke College may take disciplinary action if a safety or security incident involves a breach of staff or student disciplinary policies, and/or report safety/security incidents to the police if the incident involves an apparent criminal offence. Monitoring for such purposes may only be carried out in accordance with Pembroke College's CCTV policy which includes safeguards to ensure that individual privacy is respected appropriately.
- Movement records of staff, students and visitors to Pembroke College premises, for example the details of access to buildings or offices, whether through electronic access systems or manual records. The lawful basis for such processing is that the College, its members and visitors have a legitimate interest in implementing such measures to help maintain College safety and security.
- Records of requests and bookings for rooms, including records of any decisions the College makes pursuant to its obligation to take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, students and employees of the College and for visiting speakers. The lawful basis for such processing is that the College has a legitimate interest in making its rooms available to members of the College to enable events to be held. Where freedom of speech issues are involved, the processing is necessary for compliance with a legal obligation (namely under the Education (No 2) Act 1986).

## **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 decide to report alleged criminal misconduct to the police.

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 in a table below.

### **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 (if you are a staff member or student).

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**

The detailed table of processing activities explains how long we will keep your data.

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

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.

### **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 **the Data Protection Officer Ms Julie Saunders, The Bursar, Pembroke College, OX1 1DW**.  
Email: [DPO@pmb.ox.ac.uk](mailto: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 Pembroke College’s Data Protection Officer if you are considering how or whether to exercise your rights.

[DPO@pmb.ox.ac.uk](mailto:DPO@pmb.ox.ac.uk)

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 Pembroke College or 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 **our website**.

**Version control: V.1.0 (May 2018)**

CCTV, security and related processing

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/criminal allegation Grounds	Criminal conviction/criminal allegation grounds (further information)
1	CCTV recordings and still images taken from recordings, records of who has accessed the CCTV images and recordings and the reason for accessing them.	Only the authorised Data Controllers as per the college CCTV policy are able to download and save images. All data is obtained from the CCTV system installed at the college.	We hold recordings of CCTV footage for a period of 3 months, unless held as part of an ongoing investigation. CCTV is used for the prevention and detection of crime and public safety.activity See CCTV policy.	21 days before overwrite by the system, downloaded images are held for 3 months, unless part of an ongoing live investigation.	See CCTV policy	The College, its members and visitors have a legitimate interest in being in a safe and secure environment.  Logs of who has accessed the recordings and their reason for accessing them are recorded to comply with the College's security and accountability obligations under data protection law.			The processing is necessary for purposes of the prevention or detection of an unlawful act and must be carried out without the consent of the data subject, so as not to prejudice those purposes.	
2	The College holds contact information for students, emergency contacts (e.g. parents of students) and staff and bedroom numbers for students.	We obtain this data from the University of Oxford We obtain this data from you We generate this data about you	So that we can contact staff, students or their nominated emergency contacts in case of an emergency.	Whilst you are 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, its staff and students have a legitimate interest in being able to communicate with each other in case of an emergency.				
3	Emergency medical information about students may be held by College security.	We obtain this data from you	Where students inform us of a medical condition and/or disability that might be of assistance to us if they have a medical emergency.	Whilst you are a registered student.	Processing is necessary to protect your vital interests, or someone else's;  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 and its students have a legitimate interest in the College holding information which might help treat or prevent a medical emergency.	Processing is necessary to protect someone's vital interests where you are incapable of giving consent	N/A		
4	Informing emergency contacts about any medical emergency	We obtain this data from you and/or others who have information about you, depending on the nature of the emergency.		Whilst you are 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 and its students have a legitimate interest in emergency contacts being made aware in the event of a medical emergency.	Explicit consent.			
5	Security access records for staff, students and visitors (e.g. conference delegates, contractors). This includes your name and potentially any identity number (e.g. linked to your key swipe card or fob, including your university card number) and/or vehicle registration number. This information is also linked to our records of the timing of your access to any of our buildings or offices generated manually when you sign in with us and electronically by our key swipe card/fob system. We also hold records of the access rights that individual key holders have.	We generate this data about you	We process this information to assist with security of College premises, so that we have records of who is on the premises in the event of a fire or similar emergency, to prevent unauthorised access to College premises and to assist with issuing replacement keys, cards and fobs.	For six months.	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 members and visitors have a legitimate interest in implementing such measures to help maintain College safety and security.				
6	College security holds contact details for contractors working on College premises, and information about the contract they are working on.	We obtain this data from you	So that we may contact those working on College premises to discuss the work they are undertaking, or in an emergency.	Whilst work is ongoing or the need for further work involving you is anticipated.	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 and its contractors have a legitimate interest in being able to communicate about the work they are undertaking, or in an emergency.				
7	Accident records containing information about the date and nature of the accident, who was involved, who witnessed it and any steps taken concerning it.	We generate this data about you	So that we have a record of accidents occurring on College premises. In some cases the College also has a legal obligation to record and report accidents to the relevant regulatory authority.	Five years from the date of the accident.	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 processing is necessary for compliance with a legal obligation.	The College has a legitimate interest in creating and retaining records of accidents on College premises to assist with its management of health and safety risks.  In some cases the College is obliged to record and report accidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.	Substantial public interest under the UK Data Protection Act 2018	The processing is necessary for the protection of members of the public from any potential health and safety risks, and must be carried out without the consent of the individual so as not to prejudice such protection.  Processing to record and report relevant accidents is (where a legal obligation is imposed on the College) in the substantial public interest and pursuant to the exercise of a function conferred on a person by an enactment.		



8	Records of keys and access cards/fobs issued, including the name of the person to whom the key/fob has been issued and the identity number of the fob.	We obtain this data from the University of Oxford We generate this data about you	So that we have a record of who holds keys and access cards/fobs to support College security arrangements.	For as long as you hold the key/card/fob.	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 the security of its premises.				
9	Room bookings consisting of room, date/time, booking description and the identity of the person/society/organisation booking the room.  Records of requests and bookings for rooms, including records of any decisions the College makes pursuant to its obligation to take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, students and employees of the College and for visiting speakers.	We obtain this data from you We generate this data about you	As part of the system for providing College rooms and facilities to members of the College.	Until 12 months after 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.  Processing is necessary for compliance with a legal obligation (where freedom of speech issues are involved).	The College has a legitimate interest in making its rooms available to members of the College to enable events to be held.	Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is exercising functions conferred under the the Education (No 2) Act 1986. The 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 meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018	Where it processes criminal convictions/allegations of criminal activity data for these purposes, the College is exercising functions conferred under the the Education (No 2) Act 1986. The 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.
10	Names and addresses for delivery of mail and other items, including Parcel receipt and management records: containing names of recipient, location of parcel and who signed for it. WE do not use a parcel database system.	N/A		N/A	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 and its members have legitimate interests in receiving deliveries, and in maintaining records to help reduce the risk of deliveries being lost after receipt at the College.				
12	Pigeon hole management records, consisting of the names of pigeon hole holders.	We generate this data about you	To assist with delivering post and other items to pigeon holes.	For as long as you have the pigeon hole.	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 and its members have a legitimate interest in operating a pigeon hole system to assist with the efficient delivery of post and similar items.				
13	Parking access requests are either by email or in person and are recorded in the lodge diary.		So that we can consider applications for a parking space and decide whether to provide a space to applicants. Governing Body members have parking rights, this is not recorded.	Current lodge diary is used for 12 months. The old diary is kept for 6 months.	Processing is necessary for compliance with a legal obligation  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 supporting staff with disabilities who may have particular need of parking spaces, and taking account of its obligations to make reasonable adjustments.	Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is processing such information for the purpose of complying with its duties under the Equality Act 2010 and is necessary for the purposes of preventing a breach of that legislation. The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning equality and discrimination, including the obligation to make reasonable adjustments.  The processing must be carried out without the individual's consent, so as to avoid prejudice to the College's legal obligations if such consent were to be withdrawn.		