

**This privacy notice applies to individuals whose personal data is retained in Pembroke College, Oxford's archives**

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

**This privacy notice applies to anyone whose personal data is retained in Pembroke College, Oxford's archives. This group will include:**

- 1. Former students**
- 2. Current and former staff and officers of Pembroke College, Oxford**
- 3. Individuals who have donated items to our archives**
- 4. Researchers who access our archives**
- 5. Other third parties referred to in records held in the archive**

This notice explains what personal data Pembroke College, Oxford, 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.

This notice also explains the lawful basis on which we process your data.

For the parts of your personal data that we generate about you, or that we receive from others, this notice also explains the sources 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, Oxford's, Contact Details**

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

Jeremy Bennett, 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**

If you as a researcher do not provide your data (such as your name and contact details), you may not be allowed to access the archive.

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

Apart from the data that you provide to us, the data we hold about you may have been obtained from our staff, students, the University of Oxford, donors to our archives or other third parties.

### **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. The data we hold will generally have been obtained for other purposes originally and the law permits Pembroke College, Oxford, to retain lawfully obtained data for the purposes of archiving in the public interest, for historical or scientific research purposes or for statistical purposes. The law provides further safeguards that such processing must (a) not be likely to cause substantial damage or substantial distress to you or another individual; and/or (b) must not be carried out for the purposes of measures or decisions with respect to you or another individual, unless the purposes for which the processing is necessary include the purposes of approved medical research.

In addition, the College (or a third party such as researchers or donors of archive material) will typically also have a legitimate interest in processing data for such purposes, provided your interests and fundamental rights do not override those 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. The safeguards are that the processing must (a) not be likely to cause substantial damage or substantial distress to you or another individual; and/or (b) must not be carried out for the purposes of measures or decisions with respect to you or another individual, unless the purposes for which the processing is necessary include the purposes of approved medical research. In addition, the processing must also be in the public interest.

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 vital interests (or someone else's vital 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*

Similar 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 (in addition to the lawful basis on which we originally collected the data).

The table includes detailed information about how and why we process various categories of data, and the related lawful basis including the legitimate interest that Pembroke College, Oxford, has in processing in its archives:

- Student files including dates of attendance, course of study and outcome of their studies, results of College examinations ("collections"), University examinations, and College and University assessments, awards, scholarships and prizes conferred, applications (e.g. UCAS forms and references), academic and disciplinary records. These files may include information about a former student's personal life including their health, family circumstances, ethnicity, sexuality, political opinions, religious or philosophical beliefs, criminal convictions or allegations, gender, background, family circumstances and/or financial circumstances. Pembroke College, Oxford, has a legitimate interest in processing such data for the purposes of research and its archive in the public interest. Pembroke College, Oxford, also considers that it is in the public interest to process special category and/or criminal convictions or allegations data for such purposes.
- Extracts from staff records consisting of employee name, dates of employment, role(s), reason(s) for departure (including for example retirement, new employment or dismissal) and staff photographs.

- Other administrative records of Pembroke College, Oxford, for example Governing Body and committee records. Such records may include the personal data of College staff where they are mentioned in Governing Body minutes, for example.
- Other material collected by or donated to our archive.

### **How we share your data and the safeguards we apply to such sharing**

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. Our archives may be consulted by researchers, with our permission and subject to Data Protection law. Copies of material may be made or provided subject to the researcher signing an agreement relating to conditions of use where relevant.

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.

### **Sharing your data outside the European Union**

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

We may transfer your data outside the European Union, but only for the purposes of research and provided either:

- There is a decision of the European Commission that the level of protection of personal data in the recipient country is adequate; or
- Appropriate safeguards are in place to ensure that your data is treated in accordance with UK data protection law, for example through the use of standard contractual clauses; or
- There is an applicable derogation in law which permits the transfer in the absence of an adequacy decision or an appropriate safeguard.

### **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**

As your data is being processed for the purposes of archiving and historical research, we will keep it until the data is no longer required for this purpose. In practice, this means your data is likely to be retained permanently. However, if you believe our processing this data will cause you substantial damage or substantial distress, please contact our Data Protection Officer so that we may consider whether it is appropriate for us to continue processing it, and/or whether further safeguards may be applied to our processing of the 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 in our detailed table of processing activities below.
- 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 our Data Protection Officer:

Jeremy Bennett, Bursar, Pembroke College, Oxford, OX1 1DW

[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.

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, Oxford'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)**

Oxford Colleges GDPR Project - Archives

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	Names, contact information, the dates and nature of enquiries including visitors  Records include the contact details of enquirers and records of enquiries which may include other personal data relevant to the enquiry.  Records may also include disability information if this is relevant to accessibility of the archive. It may also include information about the reasons for the researcher's interest, which may refer for example to their religion or belief.	We obtain this data from you We generate this data about you	To maintain a record of how our archives have been used and who has previously used them, so that we can monitor the use and integrity of our archives.  It is useful to refer back to earlier enquiries on similar topics.  This information is also retained for the security of the collections.	Permanently, except for disability information provided to us solely for accessibility purposes, which will be retained for 12 months after your last contact with us.	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 integrity of its archives, to ensure they are kept securely and are available as a resource for researchers and others with a legitimate interest in reviewing the archives.	Processing is necessary for compliance with equality law (Substantial public interest under the UK Data Protection Act)	In the case of processing disability data relevant for access requirements, the processing is necessary for the prevention of a breach of its obligations under the Equality Act 2010. The 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.  Such processing must be carried out without consent so as not to prejudice those purposes.  In the case of other special category data, the processing is necessary for archiving and/or scientific or historical research purposes, and is in the public interest.	N/A	
2	Records of College cultural life: photographs, pictures, written records, trophies, other memorabilia and ephemera of college members, teams, choirs, clubs and societies, plays and performances, of participation in events and sporting fixtures and of the outcomes. This may include written correspondence and minute books relating to these matters.	We obtain this data from you We generate this data about you We obtain this data from other third parties e.g. student societies.	As part of the College archive recording College life, which may be relevant to you individually (for example if you later request a reference from us), but which is also part of the College's own record of what its members have achieved over time.	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.	Processing is necessary for archiving purposes in the public interest as permitted under the UK Data Protection Act	There is a public interest in the College maintaining its archive of College life for future generations, and in the context of the College being a College of a long-established University with a strong identity and history.  The College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision 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 decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.	The processing meets a condition in Part 1 of Schedule 1 to the Data Protection Act 2018	Where it processes such data for archiving purposes, the College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision 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 decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.
3	Conservation information relating to items in the College archive, including the identity of who carried out the conservation and of the item on which the conservation measures were performed.	We obtain this data from you We generate this data about you Third party	To maintain a record of conservation measures applied to items in our archive to help with future conservation.	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 records of conservation measures which will assist future conservators to make decisions about the appropriate conservation techniques to use.	N/A			

4	<p>Personal papers and collections donated to the College archive. These may consist of correspondence and documents relating to and/or referring to the donor or third parties.</p>	<p>We obtain this data from you We may receive this from third parties (e.g. donors)</p>	<p>As part of the College archive we accept and maintain papers and collections of significance to the College or which are otherwise of importance as an archive.</p>	<p>Permanently.</p>	<p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p>	<p>The College has a legitimate interest in receiving collections and papers for its archive, and donors have a legitimate interest in giving such collections and papers to the College.</p>	<p>Processing is necessary for archiving purposes in the public interest and for research purposes as permitted under the UK Data Protection Act</p>	<p>There is a public interest in the College maintaining its archive of College life for future generations, and in the context of the College being a College of a long-established University with a strong identity and history.</p> <p>The College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision 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 decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.</p>	<p>The processing meets a condition in Part 1 of Schedule 1 to the Data Protection Act 2018</p>	<p>Where it processes criminal convictions data for archiving purposes, the College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision 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 decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.</p>
5	<p>Records of the acquisition of items in the archive, including who the item was received from and the date of receipt. Catalogues, indexes and lists of items in the archive including the same information.</p>	<p>We generate this data about you</p>	<p>To maintain a record of the content of our archive and how it was acquired, as a record in its own right and in case enquiries are subsequently made about the archived item itself (for example, about ownership of the item).</p>	<p>Permanently.</p>	<p>Processing is necessary for the performance of a task carried out in the public interest</p> <p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p>	<p>The College has a legitimate interest in recording, indexing and cataloguing its archive acquisitions.</p>				
6	<p>Archives of academic conferences, seminars and lectures hosted and/or organised by the College, consisting of the names of attendees, agenda/programmes, papers delivered.</p> <p>These records may include the personal data of attendees and organisers.</p>	<p>We obtain this data from you</p>		<p>Permanently.</p>	<p>Processing is necessary for compliance with a legal obligation</p> <p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p>	<p>The College has a legitimate interest in archiving past conferences, seminars and lectures that it hosted and/or organised.</p>				
7	<p>Student files including dates of attendance, course of study and outcome of their studies, results of College examinations ("collections"), University examinations, College and University assessments, awards, scholarships and prizes conferred, applications (e.g. UCAS forms and references), academic and disciplinary records.</p> <p>These files may include information about a former student's personal life including their health, family circumstances, ethnicity, sexuality, political opinions, religious or philosophical beliefs, criminal convictions or allegations, gender, background, family circumstances and/or financial circumstances.</p>	<p>We generate this data about you; We obtain this data from the University of Oxford.</p>	<p>So that we have a record of student results, as a record of your academic progression and if we are later asked for a reference or verification of your attendance.</p> <p>To maintain the College archive of its former students and to historically document the College's teaching function, and for the purposes of future research.</p>	<p>Permanently.</p>	<p>Processing is necessary for performance of our contract with you;</p> <p>Processing is necessary for the performance of a task carried out in the public interest;</p> <p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.</p>	<p>The College has a legitimate interest in maintaining an archive of its activities as part of a long established university with a strong identity and history, and in maintaining such records for future research.</p>	<p>Processing is necessary for archiving in the public interest, and/or for historical research purposes.</p>	<p>There is a public interest in the College maintaining its archive of College life for future generations, and in the context of the College being a College of a long-established University with a strong identity and history.</p> <p>The College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision 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 decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.</p>	<p>The processing meets a condition in Part 1 of Schedule 1 to the Data Protection Act 2018</p>	<p>Where it processes such data, the College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision 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 decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.</p>

8	Employee records for academic staff consisting of the employee name, dates of employment, role(s) and reason(s) for departure (including for example retirement, new employment or dismissal), staff photograph.	We obtain this data from you We generate this data about you	To maintain historic records of College employees for the archive, and in case we are approached for references.	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 activities as part of a long established university with a strong identity and history, and in maintaining such records for future research.  The College, its former employees and other parties have a legitimate interest in the College being able to provide references for former staff.	Processing is necessary for archiving in the public interest, and/or for historical research purposes.	There is a public interest in the College maintaining its archive of College life for future generations, and in the context of the College being a College of a long-established University with a strong identity and history.  The College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision 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 decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.	The processing meets a condition in Part 1 of Schedule 1 to the Data Protection Act 2018	Where it processes such data, the College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision 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 decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.
9	Employee records for non-academic staff, consisting of the employee name, dates of employment, role(s) and reason(s) for departure (including for example retirement, new employment or dismissal), staff photograph.	We obtain this data from you We generate this data about you	To maintain historic records of College employees for the archive, and in case we are approached for references.	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 activities as part of a long established university with a strong identity and history, and in maintaining such records for future research.  The College, its former employees and other parties have a legitimate interest in the College being able to provide references for former staff.				
10	Governing body and committee agenda, minutes and related correspondence. These may include personal data of the meeting attendees, correspondents and of individuals referred to in the documents.	We obtain this data from you We generate this data about you	To maintain a historic record of College administration.	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 activities as part of a long established university with a strong identity and history, and in maintaining such records for future research.	Processing is necessary for archiving purposes in the public interest as permitted under the UK Data Protection Act	There is a public interest in the College maintaining its archive of College life for future generations, and in the context of the College being a College of a long-established University with a strong identity and history.  The College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision 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 decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.	The processing meets a condition in Part 1 of Schedule 1 to the Data Protection Act 2018	Where it processes such data, the College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision 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 decisions with respect to a particular data subject, unless the purposes for which the processing is necessary include the purposes of approved medical research.

11	Financial records and legal records relating to College assets and the College estate. These may include the personal data of individuals involved in managing the College assets and estate, witnesses and parties to legal documents. This also include records relating to financial assets owned by the College (for example clerical livings) and may include details of related individuals such as incumbents.	We obtain this data from you We generate this data about you	To maintain a historic record of College finances and assets.	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 activities as part of a long established university with a strong identity and history, and in maintaining such records for future research.				
12	Records relating to College buildings, including architectural records and maintenance records. These may include the personal data of those involved in construction and maintenance of College buildings. This also include records relating to property previously owned by the College and may include details of related individuals such as tenants, previous and subsequent owners.	We obtain this data from you We generate this data about you	To maintain a historic record of College architecture, and to assist future conservation of College buildings.	Permanently.	Processing is necessary for the performance of a task carried out in the public interest;  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 its historic buildings. It also has a legitimate interest in maintaining a record of its activities as part of a long established university with a strong identity and history, and in maintaining such records for future research.				
13	Governance documents: College statutes and documents relating to their interpretation, including Privy Council documents and correspondence, decisions and documents relating to the College Visitor, Royal Commissions and related documents.  These records may include the personal data of those named in the documents, including correspondents.	We obtain this data from you We generate this data about you	To maintain a historic record of governance documents relating to the College.	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 governance documents for future reference.				
14	Domestic records including but not limited to: room lists; domestic arrangements; visitors books; student surveys and suggestion books	We obtain this data from you We generate this data about you	To maintain a historic record of College mamagement.	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 governance documents for future reference.				