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

A summary of what this notice explains

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

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

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

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

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

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

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

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

"Processing" your data includes various operations that may be carried out on your data, including collecting, recording, organising, using, disclosing, storing and deleting it.

Data protection law requires us:

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

Pembroke's Contact Details

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

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

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

Other sources of your data

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

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

- Medical and social care professionals
- Financial organisations
- Law enforcement and government authorities

The lawful basis on which we process your data

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

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

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

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

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

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

The Special Categories of personal data consist of data revealing:

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

They also consist of the processing of:

- genetic data;
- biometric data for the purpose of uniquely identifying someone;
- data concerning health;
- data concerning someone's sex life or sexual orientation.

We may process special categories of personal data in the following circumstances:

- With your explicit written consent; or
- Where it is necessary in the substantial public interest, in particular:
 - is necessary for the purposes of the prevention or detection of an unlawful act, must be carried out without the consent of the data subject so as not to prejudice those purposes; or
 - 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 an appropriate policy document and/or other safeguards which we are required by law to maintain when processing such data.

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

Criminal convictions and allegations of criminal activity

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

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

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

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

- Details of which course you are studying
- Other data that is necessary to the operation of the Pembroke College/student contract or to the functioning of Pembroke College including:
 - any data about you contained in your assessed work, our assessments of your work and details of any qualifications you are awarded;
 - o details of any disciplinary complaints or decisions about you;

- o your contact and accommodation details;
- any communications you have with us, and any communications we generate about you, for example if you ask us to defer your studies to a later academic year;
- details of any payments that you make to us, including your bank/payment card details.
- Data you and others sent us when you applied to us (including information sent to us via UCAS and your predicted grades). This includes your academic record and personal statement which we use to assess your application;
- Details of any relevant criminal convictions, allegations or charges that we ask you to declare to us either when you apply to us, or whilst you are a student, or which are reported to us, and of any Disclosure and Barring Service checks that we request. Relevant criminal convictions or charges are those that indicate an applicant or student might pose an unacceptable risk to other students or staff.

More information is available for undergraduate admissions at:

https://www.ox.ac.uk/admissions/undergraduate/applying-to-

oxford/decisions/criminal-convictions?wssl=1

And for graduate admissions at:

https://www.ox.ac.uk/admissions/graduate/applying-to-oxford/universitypolicies/criminal-convictions?wssl=1.

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

How we share your data

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

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

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

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

Automated decision-making

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

Sharing your data outside the European Union

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

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

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

How long we keep your data

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

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

Your legal rights over your data

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

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

Further guidance on your rights is available from the Information Commissioner's Office (<u>https://.ico.org.uk/</u>). You may also wish to contact Jeremy Bennett, Bursar, Pembroke College, Oxford. OX1 1DW ,(<u>DPO@pmb.ox.ac.uk</u>) if you are considering how or whether to exercise your rights.

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

Future changes to this privacy notice, and previous versions

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

Version control: V.1.0 (May 2018)

Prospective students and applicants

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	and hardship funds. This includes communications that we send and receive to third parties that provide financial support.	from you;	In order to make decisions about financial support and to ensure that the College is encouraging and supporting participation by talented people from all backgrounds.	Successful applicants who enrol: Permanently. Unsuccessful applicants: for 12 months after the end of the application cycle. Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.	You have given your consent to the processing for one or more specific purposes.					
2		from you We generate this data		For six months after the open day.	for the purposes of our	The College and prospective students have a legitimate interest in arranging and attending open days to share and learn about College life before deciding whether to apply.				
3	Information you provide to us or the University of Oxford during the application process, including with your UCAS and graduate application forms consisting of your name, intended course, perferred Colleges, contact details, gender identity, education and employment history, predicted grades, language proficiency, personal statement, references and any research proposal or written work that you submit during the application process.	We obtain this data from the University of Oxford	To make admission decisions.	Successful applicants who enrol: Permanently. Unsuccessful applicants: for 12 months after the end of the application cycle. Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.	in order to take steps at your request prior	should be offered places.				
4	Records of our admissions decisions, including decision letters that we send to applicants, notes of your interview performance. feedback we provide you on your application, records of the offers we make, records of whether you accept the offer, and where you do, records of whether you meet the conditions of the offer and records of whether buy our encil at the College. We also receive details of equivalent decisions by the University department that you apply to.		To make admissions decisions and inform you of the outcome.	Successful applicants who enrol: Permanently. Unsuccessful applicants: for 12 months after the end of the application cycle. Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.						

5	Sensitive data that you provide during the application process, consisting of information	We obtain this data from the University of	We process this data in order to consider whether to make reasonable adjustments (in the case of information about your disability and/or health), to implement them and for equality monitoring purposes.	Successful applicants who enrol:		The College has a legitimate interest in assessing whether any individual poses an	Substantial public interest under the UK Data	Where the College processes special category The processing meets data for these purposes, the processing is a condition in Part 2 of	Where the College processes criminal convictions/allegations data for these
	about your ethnicity, disabilities, special needs,	Oxford We obtain this data	initiation about you diadowly alogin reality, to inperient utern and to requiring molinitiang purposes. In the case of criminal convictions, the College and University will use this data to consider and make decisions about whether any conviction poses an unacceptable risk in the collegiate university environment.	remaining, Unsuccessful applicants: for 12 months after the end of the application cycle. Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.		eszeszing wirecner any nuovoua poses an unacceptable safety risk.	Protection Act 2018	una to unser purpose, tre processing sa excessary for the prevention of a breach of its Schedule to the Data obligations under the Equality Act 2010. The protection Act 2018 processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning equality and to make reasonable adjustments. The processing must be carried out without	
					Vernoten by your data protection rights and freedoms Processing is necessary for compliance with a legal obligation			The processing most set called our windout concert so as not to prejudice those purposes.	The processing most be carried out without consent so as not to prejudice those purposes.
6	Your fee status (e.g. home, EU or international) and associated information about your country of esidence, the amount of your frees and funding information including upor financial declaration, any supporting information you provide about funding (e.g. loans, grants, sponschip and/or self-funding resources, including copies of evidence you submit) and declisions that we make in light of that information.	We obtain this data from you We obtain this data from third parties (e.g. parents).	In order to determine the fees you are required to pay and to confirm that you will be able to meet the requirement to pay fees.	Successful applicants who enrol: Permanently. Unsuccessful applicants: for 12 months after the end of the application cycle. Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.	in order to take steps	Legislation determines to an extent the level of fees you are required to pay, based on your country of residence.			
	The evidence submitted by you or on your behalf may include financial information about those assisting you financially, for example parents bank statements. We may also share this data with the University.								
7	Pre-application communications with prospective students.	We obtain this data from you We generate this data	To answer queries that you may have about studying at the College.	Successful applicants who enrol: EITHER for 6 years after the end of the academic year when you cease to be a	in order to take steps at your request prior	The College has a legitimate interest in receiving and responding to a range of queries from prospective students.			
		about you		registered student, but if you are awarded a scholarship this will remain on your record permanently as part of the College archive. Unsuccessful applicants: for 12 months after	to entering a contract Processing is necessary for the purposes of our or someone else's legitimate interests,				
				the end of the application cycle. Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.	except where overridden by your data protection rights and freedoms				
8	Records about whether to invite applicants for	We obtain this data	We process this data to decide who to invite for interview.	Successful applicants who enrol:	Processing is necessary	The College has a legitimate interest in using			
-	interview, including consideration of contextual information (relating to information	from the University of	The role of contextual admissions data is explained more fully on the University's website, but is taken into	EITHER for 6 years after the end of the academic year when you cease to be a	for the purposes of our or someone else's	appropriate data about academic performance, and to take account of the			
	about your school performance, postcode and	We generate this data	account when deciding whether to invite applicants for interview in addition to candidates who have met the	registered student, but if you are awarded a	legitimate interests,	context of academic achievement in order to			
	written work that we have requested. We will	about you We also obtain this	usual departmental admissions criteria: https://www.ox.ac.uk/admissions/undergraduate/applying-to- oxford/decisions/contextual-data?wssl=1	scholarship this will remain on your record permanently as part of the College archive.	except where overridden by your	decide who to invite for interview.			
	also hold copies of the tests and written work that you submit.	data from you		Unsuccessful applicants: for 12 months after the end of the application cycle.	data protection rights and freedoms.				
				Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.					
9	We may assist students making visa applications before they arrive, and making	from you	Overseas students need visas in order to attend university.	Successful applicants who enrol: EITHER for 6 years after the end of the	Processing is necessary for performance of our		Explicit consent		
	visa extensions when they are on the course. This involves us taking copies of passports and visas, which we store electronically and share with the University so that it has records of students' entitlement to study. We also			academic year when you cease to be a registered student, but if you are awarded a scholarship this will remain on your record permanently as part of the College archive.	contract with you; Processing is necessary for compliance with a legal obligation				
	provide the University with students' name, date of birth, passport number, course, fees paid & due for it to share this information with the Home Office/UK Vissa and Immigration as part of its reporting obligations under			Unsuccessful applicants: for 12 months after the end of the application cycle. Successful applicants who do not enrol: 12					
	immigration law.			months after the last date when you could have enrolled.					

Student Data

ID. 1	Category of personal data Your dates of attendance, course of study and outcome of your studies, results of College examinations ("collections"), University examinations, and College and University assessments, awards, scholarships and prizes conferred. Records of your student status, including whether you are on the visiting student programme and whether you are a full- time or part-time student. Records of your name, gender/preferred title, official headshot/passport style photograph.		record of your academic progression and if we are later asked for a reference or verification of your attendance. So that we can administer	How long we keep it Permanently.	Our lawful basis for processing Processing is necessary for performance of our contract with you; Processing is necessary for the performance of a task carried out in the public interest; Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	Details relating to lawful basis (where applicable) The College has a legitimate interest in processing this data so that it can deliver your course. Where we keep information for the purposes of the College archive, the College has a legitimate interest in maintaining a record of who has attended, the results, awards, prizes and scholarships that were awarded, so that it may provide references and verify attendance and as part of its historic archives.	Special category grounds N/A	Special category- details of public interest etc (where appropriate)	Criminal conviction/criminal allegation grounds N/A	Criminal conviction/criminal allegation grounds (further information)
2	Information about your health, dietary requirements and/or disabilities, and records of decisions we make taking that information into account.		accommodation, catering or teaching or we need to take account of any dietary requirements you have (whether for medical or belief reasons), or where there is a medical emergency, and any decisions that we take as a result.	For 6 years after the end of the academic year yo cease to be a registered student.	 Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms; Processing is necessary for compliance with a legal obligation 	The College has a legitimate interest in taking such information into account when it makes decisions that may affect your health, wellbeing or ability to participate. Processing is also necessary for compliance with equality law, and/or food safety law.	Data Protection Act 2018	Where the College processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under the Equality Act 2010 and/or under 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 equality and to make reasonable adjustments, and to comply with its health and safety obligations. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.	N/A	
3	Information about your ethnicity, health, religion or philosophical beliefs and/or sexuality processed for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment, with a view to enabling such equality to be promoted or maintained.	We obtain this data from the University of Oxford We obtain this data from you	For equality monitoring purposes	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 and its students have a legitimate interest in monitoring and promoting equality of opportunity.	Substantial public interest under the UK Data Protection Act 2018	The processing is necessary for equality of opportunity or treatment purposes in accordance with the conditions and safeguards specified in the Data Protection Act 2018, with a view to promoting or maintaining such equality.	N/A	
4	assessment.	We obtain this data from you We generate this data about you	To help develop and guide you during your studies, our tutors monitor and assess your contributions in tutorials, including your written work, provide feedback and may ask you to self-assess your progress.	Permanentiy.	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.	The College has a legitimate interest in keeping such records to help develop and guide students during their studies.	N/A		N/A	

5 Requests for assistance with academic matters, such as applications for special examination arrangements, requests for extensions to written work and submission of extenuating circumstances. Decision-making about such requests and records of actions taken.	We obtain this data from you We generate this data about you	We process this information and make decisions about you when you ask us to, and in accordance with the College's policies relating to such requests.	Permanently.	Processing is necessary for performance of our contract with you; Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms; Processing is necessary for the performance of a task carried out in the public interest Processing is necessary for compliance with a legal obligation	The College has a legitimate interest in ensuring that such requests for assistance are considered pursuant to its procedures and in accordance with relevant legislation.	Substantial public interest under the UK Data Protection Act 2018	Where the College processes special category data for these purposes, 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. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.		
6 Records of student helpers/hosts at open days, consisting of the name and contact details of the helper/host, records of the hours worked			For 6 months after the end of the academic year you cease to be a registered student.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College and prospective students attending open days have a legitimate interest in current students acting as hosts, to give prospective students an insight into College life.				
7 Details of your accommodation tenancy or licence agreement, including the duration of your occupancy, payments you have made and decisions about accommodation applications and room allocation.	We generate this data about you	In order to provide you with accommodation.	Records relating to accomodation tenancy or licence agreements will be retained for 6 years after the end of the academic year when your tenancy or licence ends.	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	The College and its residents have a legitimate interest in the College providing accommodation and operating it efficiently and safely.				
8 Other records relating to your accommodation, for example your contact information, accommodation requests and preferences, booking forms for students and guests, records of any family members or dependants who occupy the accommodation, records of overnight guests, lost property records, rental of fridges, records of your accommodation inventory and of the condition/cleanliness of your accommodation throughout your occupancy.		In order to provide you with accommodation and related services and so that we have records for safety purposes of who is in College premises.		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	The College and its residents have a legitimate interest in the College providing accommodation and operating it efficiently and safely.				
9 Records of requests and bookings for rooms and facilities for events held by students/student societies, 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.		As part of the system for providing College facilities to students and student societies.	Records will be retained for one year from the date on which a decision is made.	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 the performance of a task carried out in the public interest; Processing is necessary for compliance with a legal obligation.	The College has a legitimate interest in ensuring that such requests and bookings are considered pursuant to its procedures and in accordance with relevant legislation. The College has a legal obligation under the Education (No 2) Act 1986 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.		Where the College processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under 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 is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.	condition in Part 2 of Schedule 1 to the Data Protection Act 2018	Where the College processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under 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 is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.

10 Financial information including your contact information and details of invoicing and payment (including payment information such as credit card or banking payment information) of "battels", namely: College fees, accommodation, deposits, food and drink, laundry, use of sporting and other facilities as we have arranged with you.	We obtain this data from you We generate this data about you	In order to provide your course, accommodation and associated services.	Records of outstanding payments will be retained until they are paid in full. Records relating to invoicing and payment details will be retained for six months after the date on which you cease to be a registered student at the College.	Processing is necessary for performance of our contract with you;					
owe so that we may do this. We transfer the	We generate this data about you We obtain this data from the University of Oxford		For 6 years after the end of the academic year you cease to be a registered student.		The University has a legitimate interest in collecting fees due to it.				
12 Information that you submitted to UCAS and/or the University, College or any third party when you applied to study at Oxford, including your academic, employment history, predicted grades, language proficiency and personal statement; details of our admissions decision about you. Details of any references, written work or research proposals you submit as part of your application, and any records we make of your application or interview. Communications between us about your admission, including feedback we provide.		So that we have a record of our admissions decisions and can administer your application and your course. Also so that we have information and about your background and history if we are asked to provide a reference at a later date.	Permanently.	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.	The College has a legitimate interest in being able to provide references to its students and former students.				
13 Details of any criminal records that you declare to us on your application, or during your studies, or of any criminal incidents or allegations concerning you reported to us by anyone else. Details of any Disclosure and Barring Service Checks about you obtained prior to or during your studies.	We obtain this data from you; We generate this data about you; We may obtain this data from third parties		Where criminal convictions, incidents or allegations are declared or reported to us, we will retain this data permanently. Where we require a Disclosure and Barring Service check to be carried out, we will retain the DBS certificate information for 6 months from the date the certificate is recieved and a skeleton record that the check was satisfactory or unsatisfactory passed will be kept on your College file for 6 years from the end of the academic year in which you cease to be a registered student at the College.	you; Processing is necessary for the purposes of our or someone else's legitimate interests, except where	The College has a legitimate interest in requiring DBS checks to be carried out where its students are or may be engaged in regulated activity with children or vulnerable adults.	Substantial public interest under the UK Data Protection Act 2018	Where the College processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under 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 equality and to make reasonable adjustments, and to comply with its health and safety obligations. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.	condition in Part 2 of Schedule 1 to the Data Protection Act 2018	Where the College processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under 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 equality and to make reasonable adjustments, and to comply with its health and safety obligations. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.

	Your fee status (e.g. home, EU, or international) and associated information about your country of residence, the amount of your fees and funding information including your financial declaration, details of any guarantee from parents or others, any supporting information you provide about funding (e.g. loans, grants, sponsorship and/or self-funding resources, including copies of evidence you submit) and decisions that we make in light of that information.		In order to determine the fees you are required to pay and to confirm that you will be able to meet the requirement to pay fees.	Permanently.	Processing is necessary for performance of our contract with you; Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms; Processing is necessary for compliance with a legal obligation	Legislation determines to an extent the level of fees you are required to pay, based on your country of residence. The College has a legitimate interest in being able to satisfy itself that students have appropriate arrangements are in place to meet the costs of their course and living expenses.			
	Disciplinary, harassment or grievance records if a disciplinary, harassment, grievance or other complaint is made by you or about you to the College, including records of any investigation and / or decision that we take, and of any appeals process.	We obtain this data from the University of Oxford We obtain this data from you We generate this data about you We obtain this data from third parties	So that the College can maintain appropriate standards of conduct and behaviour for the benefit of all its members and visitors.	Disciplinary, harassment or grievance records about you will be retained for 6 years after the end of the academic year when you cease to be a registered student.	Processing is necessary for performance of our contract with you; Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College, its staff and students have a legitimate interest in the College being able to operate disciplinary, harassment and grievance procedures in accordance with its procedures.	Data Protection Act	Where the College processes special category data for these purposes, 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. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018 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. The processing is also necessary for the exercise of a protective function. In both cases, the processing must be carried out without consent so as not to prejudice those purposes.
	Records of College cultural life: photographs and written records of teams, choirs, clubs and societies, plays and performances, of participation in events and sporting fixtures and of the outcomes.	We generate this data about you	To allow the College's cultural life to function and flourish, and in order to maintain a record of College life, which may be relevant to you individually (for example if you later request a reference from us), and which is also part of the College's own archive record of what its members have achieved over time.	Records will be retained within College archives permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining a record of its cultural life, including for researchers and future students.			
17	Meal bookings and attendance.	We obtain this data	So that we may provide catering services to		Processing is necessary for				
			students and invoice them correctly for the services provided.	when you cease to be a registered student.	performance of our contract with you.				
	Records generated for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom of information legislation, records made to comply with safeguarding, health and safety or counter-terrorism legislation, in connection with legal advice or claims, or to comply with auditors' requirements.	about you	So that we have a record of information supplied, both in the interests of good administration and also to meet legal and regulatory requirements.	These records will be retained for a period of 6 years from the date generated for compliance purposes unless there is compelling justification for the data to be retained for a longer period (for example in connection with legal advice, or in relation to auditing obligations).	Processing is necessary for compliance with a legal obligation		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 legislation and/or complying wth regulatory requirements. The processing is necessary for reasons of substantial public interest, namely the requirement for the College to comply with its statutory and legal obligations.	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018 complying wth regulatory requirements. The processing is necessary for reasons of substantial public interest, namely the requirement for the College to comply with its statutory and legal obligations.
19	Passport records for overseas trips and events.	We obtain this data from you	Where the College organises an event abroad (for example a College Choir event).	For 3 months after the date on which you return from the overseas event/trip.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in arranging cultural events abroad.	Explicit consent		

20	Information and copies of records confirming your entitlement to study in the UK, including records of your confirmation of acceptance for studies, passport, student visa and/or biometric residence permit, attendance records. We also have access to the University's system that shows whether you have the right to work in the UK.	We obtain this data from the University of Oxford We obtain this data from you		For 6 years after the end of the academic year you cease to be a registered student.	Processing is necessary for performance of our contract with you; 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, its students and the University have a legitimate interest in the Colleges being able to provide information to the University in order to enable it to comply with immigration law obligations. In the case of right to work information, the processing is necessary for the College to comply with the requirements of UK Visas and Immigration under immigration law.		
21	We may assist students making visa applications before they arrive, and making visa extensions when they are on the course. This involves us taking copies of passports and visas, which we store electronically and share with the University so that it has records of students' entitlement to study. We also provide the University with students' name, date of birth, passport number, course, fees paid & due for it to share this information with the Home Office/UK Visas and Immigration as part of its reporting obligations under immigration law.	We generate this data about you	university.	For 6 years after the end of the academic year you cease to be a registered student.	performance of our contract with you; Processing is necessary for compliance with a legal obligation		Explicit consent	
22	Emergency contact details	We obtain this data from you	So that we are able to contact people close to you in the event of an emergency.	For 6 years after the end of the academic year when you cease to be a registered student.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College and its students have a legitimate interest in the College being able to contact someone you nominate for emergency situations.		
23	Contextual admissions information for undergraduate admissions (relating to information about your school performance, postcode and care background).	We obtain this data from the University of Oxford	The role of contextual admissions data is explained more fully on the University's website, but is taken into account when deciding whether to invite applicants for interview (in addition to candidates who have met the usual departmental admissions criteria): https://www.ox.ac.uk/admissions/und ergraduate/applying-to- oxford/decisions/contextual-data?wssl=1	Permanently. Please note that if you participated in an outreach programme, such data may also be held on the Higher Education Achievement Tracker, operated by the University. An explanation of what is held on HEAT and for how long it is retained on that system is available here (link pending)	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.	The College has a legitimate interest in ensuring that people from a range of backgrounds have the opportunity to attend the College. Under relevant legislation the University is required to adhere to the agreement it has with the Office for Fair Access / Office for Students, which includes the use of contextual data in the undergraduate admissions process.		
24	Information about your contractual terms and conditions, personal tutor, university card number, contact details and any carer responsibilities that you tell us about.	We obtain this data from you We generate this data about you	So that we are able to deliver your course and can take account of your circumstances when we deliver it.	Permanently.	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.	The College has a legitimate interest in being able to take account of relevant circumstances when providing your course.		
25	Records of attendance at and participation in College committee meetings	We generate this data about you	Where you are a student member of a College committee, we may record your attendance and details of your involvement in the meeting minutes and in internal communications.	A permanent record will be retained in the College archive where your attendance and comments are recorded in committee mintutes. Other records will be held for 6 years after the end of the academic year when you cease to be a registered student.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College has a legitimate interest in having student representatives on certain committees, and it is necessary to process your data for those committees to function properly.		

26	Applications for and decisions about financial support (see 29), bursaries and hardship funds. This includes communications that we send and receive to third parties that provide financial support.	We obtain this data from you We generate this data about you We may receive decisions from third parties that provide financial support	In order to make decisions about financial support and to ensure that the College is encouraging and supporting participation by talented people from all backgrounds.	For 6 years after the end of the academic year you cease to be a registered student	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms. Processing is necessary for performance of a task in the public interest.	The College has a legitimate interest in receiving, considering and making decisions about financial support in the interests of its students.	
27	Records relating to degree ceremonies; attendees, catering requirements, names of your guests.	We obtain this data from you We generate this data about you	In order to provide and operate degree ceremonies.	These records will be retained for one year from the date on which the ceremony took place.	Processing is necessary for performance of our contract with you.		
28	Records concerning nominations and decisions to confer prizes, scholarships and awards, where third party donors are not involved.	We obtain this data from you We generate this data about you	In order to decide who is to receive scholarships, awards or prizes.	Permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College has a legitimate interest in making awards and awarding scholarships and prizes to students, and in fulfilling the wishes of its benefactors.	
29	Records concerning nominations and decisions to confer prizes, scholarships and awards from third party donors.	We obtain this data from you We generate this data about you; We receive this information from third party donors.	In order to decide who is to receive scholarships, awards or prizes.	Permanently.	We will only share your information with such a donor with your consent.		
30	Student debtor records and records of debts recovered, records of decisions we take about debts.	We generate this data about you	In order to consider and take appropriate action. Depending on the circumstances this may include exploring alternative funding options and support that the College may offer, instalment payments, considering and implementing other measures to recover debts, such as late payment charges, disciplinary options and/or debt recovery action.	Records of outstanding payments will be retained until they are paid in full (or a final decision is made in relation to recovery of the debt). Information will otherwise be retained for 6 years from the date on which you cease to be a registered student of the College.	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	The College has a legitimate interest in being able to collect detbs owed by students and former students.	
31	Library access and book records, overdue book records, records of library cards and library fines.	We generate this data about you	To operate College library facilities.	These records will be retained for a period of one year from the date of closure of your library account.	Processing is necessary for performance of our contract with you; Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in being able to operate its library and collect fines in accordance with its regulations and procedures.	

l	

32	Records of any decisions that you tell us about regarding your course, such as options you wish to take, or if you decide to change or withdraw from your course, intermit or suspend your studies. Records of any decisions we make about your wishes, such as whether to allow you to take options, change your course or suspend your studies.	We obtain this data from you We generate this data about you	In order to consider and make decisions about your requests.	Permanently.	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.	The College has a legitimate interest in being able to make decisions about your requests in accordance with its regulations and procedures.		
33	Welfare records, including confidential records about requests for support and counselling, and of support and counselling provided.	We obtain this data from you We generate this data about you	In order to provide support and counselling services to our students.	For 6 years after the end of the academic year when you cease to be a registered student.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College and its students have a legitimate interest in providing and having access to support and counselling services.	Explicit consent	
34	Records of students who have opted out of public display of [their results/scholarships/awards/prizes]	We obtain this data from you	In order to comply with student requests	For 3 months after the end of the academic year when you cease to be a registered student.	Processing is necessary for performance of our contract with you; Processing is necessary for compliance with a legal obligation.			
35	Mailing lists informing you about events and other information about the College and University.	We generate this data about you	To enable students to participate in College events	Your email contact data will be removed from mailing lists within three months of the date on which you cease to be a registered student at the College.	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 that students are notified of information about the College and University (for example, events).		
36	Student information that appears in marketing and outreach materials, such as photographs of students and quotations about their experience, records of any students that participate in outreach activity.		To promote the College to potential applicants.	Permanently. Student information may be transferred to College archives for purposes in the public interest, or for historical research purposes as a record of College life.	You have given your consent to the processing for one or more specific purposes			
37	Research student records, including details of your supervisor, the supervision process, examiner, College advisor, thesis title, submission and viva details and outcomes, progress reports, records of meetings about your progress.	We obtain this data from the University of Oxford We generate this data about you	In order to monitor your progress and make decisions about it.	Permanently.	Processing is necessary for performance of our contract with you.			
38	Records of consultations and any medical treatment or advice given by the College nurse.	We obtain this data from you We generate this data about you		For 3 years after the end of the academic year when you cease to be a registered student, or when you reach age 21, whichever is later.	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 making a College nurse available to provide basic medical advice and treatment to its students.	Processing is necessary for health purposes under the Data Protection Act 1988.	
39	Data listed in this table that we hold after the end of your contract with us, including data that we hold permenently for archiving and research purposes.		In order to provide references, and so that we have a record if required by a regulator, for archiving and research purposes and/or for the purposes of legal claims.	See periods listed elsewhere in this table.	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 being able to provide references to its students and former students, and in being able to provide information to regulators, and/or defend or make legal claims. The College also has a legitimate interest in maintaining an archive of its activities as part of a long established university with a strong identity, history and research tradition, and in maintaining such records for future research.	Processing is necessary for the establishment, exercise or defence of legal claims. Processing is necessary for archiving in the f public interest, and/or for historical research purposes.	maintaining its archive of College I generations, and in the context of being a College of a long-establish with a strong identity and history.

in the College 'College life for future ontext of the College established University History. D implement or individuals' rights ata Protection Act taking specific cressing which is likely age or substantial a and/or which is ses of measures or a particular data ses for which the culdude the purposes of ch.	Processing is necessary for the establishment, exercise or defence of legal claims. 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.
	1	

40	References we provide.	We generate this data	Where we are asked to provide a reference for	Copies of references will be kept for six years	Processing is necessary for the	The College, its students and the recipients of	
		about you	you.	from the date of provision of the reference. An	purposes of our or someone else's	references have a legitimate interest in	
				entry noting that a reference was provided will be	legitimate interests, except where	providing and receiving references.	
				retained on your permanent record.	overridden by your data protection		
					rights and freedoms		