



Protecting your privacy

1. Introduction and purpose of this document

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

This Privacy Notice explains the types of personal data we may collect about you when you interact with us. It also explains how we store and handle that data and keep it safe. This Privacy Notice does not constitute, or form part of, any contract between us. We hope that this document answers any questions you have but, if not, please do get on touch. Contact details are set out below.

The **main section** of this document covers the following information:

- Who we are, our aims and objectives;
- Key definitions, a summary of our legal obligations and contact details;
- Details regarding when and how we will collect your data, and the lawful bases we will rely on to process it;
- Our use of cookies;
- Your rights as a data subject; and
- Additional information about how we use your data including retention and sharing of your data and how to make a complaint.

The **annexes** to this document provide additional detail regarding our data collection and processing in relation to the following:

Annex A.	Students
Annex B.	Staff
Annex C.	Alumni and supporters
Annex D.	Archives
Annex E.	Conferences and events
Annex F.	Security
Annex G.	Guest Accommodation
Annex H.	Student Accommodation
Annex I.	IT systems
Annex J.	Tenants

You should refer to all relevant annexes for more specific information about the types of personal data we hold about you and how we will use it. Please be aware that more than one annex may be relevant to you, depending on your circumstances, and it is important therefore that you read this notice together with the other applicable annexes.

It is likely that we will need to update this Privacy Notice from time to time, and you are welcome to come back and check this at any time or contact us by any of the means shown below.

Past versions of this Privacy Notice are available by request to the Data Protection Officer – dataprotection@exeter.ox.ac.uk



2. Who we are, our aims and objectives

Exeter College, founded in 1314, is the fourth-oldest constituent college in the University of Oxford. It is a registered charity and operates under a Royal Charter granted in 1565 by Queen Elizabeth I and through Statutes approved from time to time by Privy Council.

The College's charitable objects are:

To maintain and support a College within the University of Oxford for the advancement of knowledge, education, research, learning and religion.

In keeping with its own history and the history of the wider collegiate University, and in pursuit of its charitable objects, Exeter College is a society of professional academics (the fellows and tutors), students (both undergraduates and post-graduate) and non-academic employees (professional officers and staff), visiting academics and persons with academic interests or other connections with the College who are offered association with the Senior Common Room, and Emeritus Fellows and Honorary Fellows working, and often living, together within the College's campus.

The College provides domestic and pastoral services to its students in addition to teaching and education. The College maintains relations with former students, former fellows and many members of its staff long after they have left the College. The College also forms similar relationships with other individuals who do not have these prior associations but who, through encounters with the College, become affiliated as supporters and friends. It is through these diverse and enduring networks of associations that the College fulfils its academic objectives and these same networks constitute the core of the College's philanthropic supporter network.

As an academic institution, the College promotes the research and academic achievements of its fellows, tutors and other associates, both present and past, and it records and similarly promotes the achievements of its students and staff, including former students and employees who have achieved distinction in many different ways after leaving the College. Throughout its history, the College has maintained a record of its activities as a place of scholarship and of the people associated with it. These records form the College archive and are a valuable source of information for present and future research and scholarship. The archive will include records of present and past members, including undergraduates, graduates, fellows, scholars, alumni and other persons associated with the College.

3. Key definitions

Exeter College is a data controller. This means that we are responsible for deciding how we hold and use personal information about you.

"Personal data" is information relating to you as a living, identifiable individual.

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

The 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.

4. Contact us

The following sections will answer any questions you have but if not, please contact our Data Protection Officer at:

By Post Exeter College, Oxford OX1 3DP, United Kingdom

By Email dataprotection@exeter.ox.ac.uk

By Telephone (44) 01865 279600

5. How we collect your personal data

Data that we collect includes names, contact details, socio-economic, medical and financial information, education, qualifications and references, passport details and nationality, awards and achievements and is collected during various periods and interactions. The data collection could be in electronic or paper format.

We collect your data:

- When you are a student of Exeter College;
- When you apply to Exeter College or request information;
- When you are an alumnus/alumna or supporter of Exeter College;
- When you are an employee of Exeter College, or an applicant for a vacancy;
- When you have a formal association with Exeter College which is not one of employment; When you are employed by Exeter College as a contractor;
- When you visit Exeter College as a tourist, a researcher in the library and archive, as a guest at a conference, event or a continuing education student;
- When you are a tenant of Exeter College;
- When you communicate or engage with Exeter College by letter, email or other means, including social media;
- When your image or vehicle number plate is recorded on our CCTV system; and
- When you access or engage with our website.

For further information about the specific types of information we collect about you, please refer to the relevant annexes.

Often, we receive your personal data directly from you. In addition, we may receive data from the University, from other Colleges, from other members of the University members, or other third parties. We may also produce personal data relating to you in the course of our relationship with you.

6. Why we collect your personal data

Exeter College collects personal data in order to manage its functions as a college within the



University of Oxford, to provide agreed courses of study, to manage college personnel and to fulfil legal and other obligations.

For example:

- Copies of passports, right to work, and visa information may be collected by us to enable us to comply with UK Immigration and Visa requirements;
- Financial data, such as student loan references, account numbers and sort codes, NI number, tax codes and payments information are collected by us to enable us to manage college accounts, fees and payroll;
- Information that you provide to us about any disabilities or health conditions you have, and about your age, ethnicity, gender, religion and belief, and/or sexual orientation may be used for equality monitoring purposes, as well as to fulfil our obligations to make reasonable adjustments pursuant to our legal obligations under the Equality Act 2010;
- When you visit our website, we may collect your IP Address, page visited, web browser, any search criteria entered, previous web page visited and other technical information. This information is used for web server monitoring and to deliver the best visitor experience;
- We may collect your social media username if you interact with us through those channels, in order to help us respond to your comments, questions and feedback;
- When we interact with you we may also collect notes from our conversations with you, and details of any complaints or comments you make.

If we are unable to collect necessary data, it may mean that we are unable to properly manage College activities, or to fulfil our obligations. Where provision of a service to you requires the collection of your personal data, it may not be possible to offer that service to you if we are unable to collect the data needed.

7. Explaining the legal bases we rely on when processing your data

The law on data protection sets out a number of different reasons or conditions for which an organisation may collect and process your personal data. When collecting your personal data, we will always make clear to you which data is necessary for each purpose.

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

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations. For example, course applicants and students will need to provide us with personal data to enable us to process their applications, manage students on-course and provide other pastoral and domestic services. Similarly, applicants for jobs and employees will need to provide details of their qualifications, and we will need to process their bank details for payments to be made.

Legal compliance

If the law requires it, we may need to collect and process your data. Relevant data may include employment information required to report earnings to tax authorities, or evidence of student attendance in support of visa conditions.



We may also share personal data with law enforcement and similar agencies to meet our obligations under UK and international law in matters such as Safeguarding and Prevent in the UK, or to assist in the investigation of fraud or other criminal activity affecting Exeter College.

Legitimate interests

In specific situations, we will process your data to achieve legitimate interests, aims and objectives as an organisation. For example, we will keep records of past members and associates of the College so we can keep you informed about the College and invite you to events which we consider will be of interest to you. We will keep donors and supporters informed of new developments in the College and of new goals which you might wish to support. We will also preserve personal data relating to present and past members and associates in the archives to record the activities of the College and College life. Where we do so, that processing will be carried out with appropriate safeguards, and in a manner which respects your rights, freedoms and interests.

Consent

In specific situations, we can collect and process your data with your consent. The use of consent will generally be limited to circumstances in which we need to collect and process special category data and where no other legal basis is applicable, for example, medical information in relation to requests for support in respect of a disability or counselling services, nationality information in support of a student's visa application, and other special category data relating to tenants of College-owned property. If you are aged under 18, we may ask your parent or guardian to provide appropriate consent.

We may also rely on your consent to send you electronic communications detailing certain events and opportunities which we consider may be of interest to you.

You are entitled to withdraw your consent at any time. This may mean that we are not able to provide you with information in which you may subsequently have an interest.

Vital 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.

For specific information about which lawful basis we will rely on in relation to your data, please see the relevant annex.

8. Special category 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. We aim to collect and process special category data as little as possible. Generally, we will only collect information on your health where we are legally obliged to do so. This is to uphold our duty of care and to ensure the safeguarding of students, candidates, employees and visitors. Other special categories of data may be revealed to us by students during the course of their studies.



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 (e.g. fingerprints) 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:

- Where there is a legal obligation;
- Where it is necessary in the substantial public interest, and further conditions are met;
- 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; or
- With your explicit written consent;

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. We have in place appropriate documents and safeguards which govern the processing of such data.

9. Visitors to our website: our use of Cookies

We use cookies on our website, which track your activity when you visit our website. We use the information gathered to improve our website and user experience. Cookies are small text files that are placed on your computer by the websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Cookies we use on the College website are:

Cookie Name	Expiration Time	Description and purpose
_ga	2 years	Google Analytics used to distinguish users
_gid	24 hours	Google Analytics used to distinguish users
_gat	1 minute	Google Analytics used to throttle request rate
PHPSESSID	end of session	Used for browser session management

These cookies are used to collect information about how visitors use our site. We only use the information to compile reports and to help us improve the site. The cookies collect information in



an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

If you would prefer to restrict, block or delete cookies from us, or indeed any other website, you can use your browser preferences to do so. If you wish to opt out of all Google Analytics tracking then you can do so, here: <https://tools.google.com/dlpage/gaoptout>

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see which cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

10. What are your rights over your personal data?

Subject to certain conditions and exceptions 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, which we will provide on request;

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 Exeter College’s Data Protection Officer using the contact details below.

Some of these rights are not automatic and we reserve the right to discuss the basis of your request with us before taking action.

Further guidance on your rights is available from the Information Commissioner’s Office (<https://ico.org.uk/>). You may also wish to contact Exeter 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.



To protect the confidentiality of your information and the interests of the College, we will ask you to verify your identity before proceeding with any request to exercise the above rights. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to request such information.

11. Data retention

Whenever we collect or process your personal data, we will only keep it for as long as is necessary for the purpose for which it was collected. The College's Registers of Processing Activities (ROPAs) includes retention periods and will indicate the types of data which are archived for historical or statistical purposes. The ROPA can be viewed [here](#).

Retention periods may increase as a result of changes in legislation and in the circumstances of legal proceedings, it may be necessary to suspend the deletion of personal data. At the end of the retention period your data may be deleted completely, put beyond use or anonymised.

Where data is placed into the archives of the college, it will be kept in perpetuity. Such data includes that which reflects College life, or our history and heritage, and which is therefore archived by us in the public interest.

We may retain anonymised statistical data indefinitely to enable us to report on such matters as diversity and equality, or the incidents of complaints. Anonymous data is no longer personal data, and as such is not subject to data protection legislation requirements.

For your security, we use all appropriate organisational and technical security controls to safeguard your data.

12. Sharing your data

Where appropriate, data is shared by the College with the University.

We do not, and 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. Where information is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the relevant purpose. Examples of instances in which we may share your data are:

- Data to facilitate joint events may be shared within the collegiate University;
- Legal advisors, accountants, auditors, and agents: to facilitate the legal, financial, charitable, commercial and other activities of the College.
- Police and other investigatory agencies: where, in context, it is necessary in order to carry out, or assist in, a relevant investigation.
- Third party contractual service providers: to ensure the smooth running of College services and systems.

It also includes disclosures where the third party is an agent or service provider appointed by the 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 the Data Sharing Table [here](#).

13. Protecting your data outside the EEA

Occasionally we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA). The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA, but we will only do so if an adequacy decision of the European Commission is in place, or appropriate data protection safeguards have been put in place, or it is otherwise lawful to transfer the data. For example, this might be required when we store data in a Cloud Service, or engage international firms to carry out data processing activities on our behalf.

14. The use of personal data for marketing purposes

We will only send you electronic communications where we have your consent. In relation to other marketing activities, including postal and telephone communications, and analysis or profiling of contacts to ensure appropriate messages are provided, we have a legitimate interest in carrying out these activities and do so with appropriate consideration of and regard for your rights.

You are free to opt out of hearing from us at any time. You can stop communications from Exeter College as follows:

By clicking the 'unsubscribe' link in any email communication that we send you will stop further marketing communications. ; or

By contacting us using the information below.

15. Automated decision making

The College does not carry out automated decision making.

16. How to complain about our processing of your data

If you feel that your data has been handled incorrectly, or you are unhappy with the way we have dealt with your query regarding the way we use your personal data, you have the right to complain to the Information Commissioner's Office (ICO) which regulates the use of information in the UK.

You can call them on [0303 123 1113](tel:03031231113) or go online to www.ico.org.uk/concerns

If you are based outside the UK you have the right to complain to the relevant data protection supervisory authority in your country.



EXETER
COLLEGE
OXFORD

If you would like to discuss any aspect of this policy or the way Exeter College processes your information please contact:

The Data Protection Officer;

By Post Exeter College, Oxford OX1 3DP, United Kingdom

By Email dataprotection@exeter.ox.ac.uk

By Telephone (44) 01865 279600

This version of the Privacy Statement was confirmed on **28 November 2018**.