



# Name of Policy: Privacy Policy

**RESPONSIBLE COMMITTEE:** General Purposes Committee

**RESPONSIBLE OFFICER:** Principal Bursar

**LINKED DOCUMENTS: College:** Records of Processing Activities, Data Sharing Table, Cookie Policy

**LINKED DOCUMENTS: Other:** N/A

**Annual Review date:** First meeting of Hilary Term

## INTRODUCTION

St John's College respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. [Important Information and Who We Are](#)
2. [The Data We Collect About You](#)
3. [How Is Your Personal Data Collected](#)
4. [How We Use Your Personal Data](#)
5. [Disclosures of Your Personal Data](#)
6. [International Transfers](#)
7. [Data Security](#)
8. [Data Retention](#)
9. [Your Legal Rights](#)
10. [Glossary](#)

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### Purpose of this privacy policy

This privacy policy aims to give you information on how St John's College collects and processes your personal data. In particular, this privacy policy informs you as to how St John's College collects and processes your personal data where:

- You are a student or prospective student at St John's College;
- You are an employee or applicant for employment or senior membership with St John's College;
- You are a member in our St John's College Staff Pension Fund (**SJCS**P) (including



current members, deferred members, pensioners and individuals who have opted out of membership);

- You are next of kin or other emergency contact for a student, staff member or visitor of St John's College;
- You are one of our alumni, or a donor or supporter of St John's College;
- Your personal data is retained in our archives;
- You are an attendee or organiser of, or otherwise involved in, a conference or event hosted at St John's College;
- You are (or the business that you represent is) a supplier or contractor of St John's College, or you have a relationship with St John's College in connection with property transactions or for accounting, administrative or other similar purposes;
- You are involved in our access and outreach programmes (including pupils, parents, guardians, teachers or school staff);
- You are a user of St John's College IT systems, email or telephone/mobile devices;
- You are a visitor of our Inspire Digital Hub;
- Your personal data is processed by St John's College for security and CCTV purposes.
- You are a user of the St John's College website.

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements the other notices and is not intended to override them.

## Controller

St John's College is the controller and responsible for your personal data (collectively referred to as **St John's, we, us or our** in this privacy policy).

We have appointed a Data Protection Officer (**DPO**) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise [your legal rights](#) please contact the DPO using the details set out below.

## CONTACT DETAILS

Our full details are:

Full name of legal entity: Saint John Baptist College in the University of Oxford.

Our address is St Giles, Oxford OX1 3JP.

Email address: [data.protection@sjc.ox.ac.uk](mailto:data.protection@sjc.ox.ac.uk)

Postal address: The Data Protection Officer, St John's College, St Giles, Oxford OX1 3JP



Telephone number: 01865 277321

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Data protection law requires St John's College, as controller for your data:

- 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.

### **Your duty to inform us of changes**

It is important that the personal data we hold about you is accurate and current. We may ask you to confirm updates to your personal data from time to time but please keep us informed if your personal data changes during your relationship with us in the meantime. Please inform the DPO of any changes in your data at the following email address: [data.protection@sjc.ox.ac.uk](mailto:data.protection@sjc.ox.ac.uk)

### **Third-party links**

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We and organisations connected with us (such as Oxford University) have a social media presence for the purpose of engaging with our students, alumni and visitors.

If you enable such connections or choose to communicate your personal data to us via third-party websites or social media, please remember that we do not control these third-party websites and are not responsible for their privacy statements. When you leave our website or interact with us on social media, we encourage you to read the privacy policy of every website or forum that you visit or use.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we



have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, details of the organisation that you represent where applicable, vehicle registration, marital status, title, date of birth, gender, photographs and audio and video recordings, copy identification documents, right to work and entitlement to study checks, visa information (including applications and extensions) and other immigration data, biometric residence permit or other biometric data as part of immigration records, your university card number, your library card number.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Financial Data** is usually relevant where we have made payments to you or received payments from you, and includes information relating to your battels if you are a student, deposit information, bank account and payment card details, BACS IDs, national insurance numbers, tax codes, payslips, student loan status, financial support information and library fines.
- **Transaction Data** includes details about payments to and from you and other details of transactions you have entered with us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, other technology on the devices you use to access our website and fob or swipe card access data.
- **Profile Data** includes your username and password to any St John's College online service, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, services and networks.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Application Data** is usually relevant where you have applied to study with us or participate in one of our access programmes, and includes:
  - academic qualifications, awards and achievements, references, employment and professional history;
  - information relating to your school performance and predicted grades;
  - any information you may provide to us or to the University of Oxford as part of your application to study (including via UCAS) and your personal statement;
  - information relating to your interview with us and any tests or written work we ask you to submit;
  - any offers we make to you (including conditions on such offers), any feedback we may give to you on your application; and
  - your interests and preferences (such as with regard to courses and colleges);
  - for our access programmes: your school name, home postcode, date of birth, legal sex, disability or long-term medical condition, ethnicity, first language, in receipt of free school meals, in care with a local authority.
- **Education Data** is usually relevant where you are a student or former student of St John's College. This includes:



- your contract with us, details of your course, your dates of attendance and records of any decisions regarding your course (such as optional modules, withdrawals, suspensions or changes to your course), matriculation or start date and graduation date;
- your assessed and self-assessed work, our assessments of your work, your contributions in tutorials, any feedback we may give on your work, your thesis title and submission, viva details and outcomes and progress reports;
- examination results, any qualifications you are awarded and the outcome of your studies, details of awards, scholarships, accolades, bursaries and prizes you are awarded and your achievements;
- information relating to your use of our facilities (including bookings for rooms and facilities for events), information relating to your participation in college teams, choirs, clubs, societies plays, performances, events and sporting fixtures, records of your attendance at and participation in College committee meetings and details relating to your library access and usage; and
- information about you contained in any communications between you and us.

- **Accommodation Data** is usually relevant where you are a student or former student of St John's College, and includes:
  - details of your accommodation tenancy or licence agreement, including the duration of your occupancy;
  - your accommodation requests and preferences and decisions about accommodation applications and room allocations;
  - booking forms for students and guests, records of family members, dependants or other overnight visitors who occupy the accommodation; and
  - lost property records, fridge rental information, accommodation inventory and information relating to the condition and cleanliness of your accommodation.
- **Professional Data** is usually relevant where you are an employee or have applied for a job or senior membership with St John's College, and includes:
  - position and role, contract terms, grade, salary, benefits entitlement and usage (including in relation to childcare vouchers, healthcare, interest free loans and travel passes, as applicable);
  - recruitment records and application paperwork, including academic qualifications, awards and achievements, professional history, references, requests for special arrangements, communications regarding our decisions and relevant committee and panel reports, probation period records and decisions;
  - teaching schedule information, rotas, time sheets, casual work claim forms;
  - information relating to your SCR membership;
  - opinions and comments made by you on students' academic reports or



otherwise expressed and recorded (such as during College meetings);

- learning and development records, including completions, accreditations and certifications;
- capability procedure records, including performance indicators, records of review meetings, feedback, evaluations, decisions and outcomes;
- promotion and progression records, including applications, references and supporting materials and records of deliberations and decisions, feedback and awards (including long service awards), appraisal records and personal development plans;
- attendance and absence records, including leave requests, sabbatical entitlement and requests;
- housing information including applications, decisions and arrangements, information relating to tenancy agreements, rents, deposits and occupants;
- research project and funding applications and renewals;
- information relating to your use of our facilities (including bookings for rooms and facilities for events), information relating to your participation in college teams, clubs, societies plays, performances, events and sporting fixtures, records of your attendance at and participation in College committee meetings and details relating to your library access and usage;
- details of your attendance at and participation in College administrative meetings;
- information relating to joint equity scheme arrangements (including title documents, copies of mortgage paperwork and payment records);
- information about you contained in communications between us and you; and
- end of employment records including details of exit interviews, termination or redundancy records.

- **Welfare Data** is usually relevant where you are a student or former student of St John's College or have applied for a job or senior membership with us. This includes:

- emergency contact information, age, ethnicity, gender, religion and belief, sexual orientation, disability information, dietary requirements and information relating to criminal convictions and allegations of criminal activity (including DBS check results);
- medical and sickness records, and health and safety or accident related information, fit notes and return to work documentation;
- grievance and disciplinary information, information relating to harassment allegations or other complaints;
- pastoral care records;
- your requests for assistance (including applications or requests for reasonable adjustments, special examination arrangements, requests for extensions to written work, submission of extenuating circumstances) and our decisions in relation to such requests or applications;



- your carer responsibilities and information relating to your care background and other similar contextual information; and
- information relating to your accommodation requirements or concerns.
- **Pensions Data** is relevant where you are a member of the SJCSPF and includes identification numbers, quotes and projections, terms, benefits and contributions, birth, marriage and death certificates and divorce arrangements, details of dependents and expressions of wish for in service benefits.
- **Alumni, Donor and Supporter Data** is relevant where you are a member of our alumni or have donated to or otherwise supported St John's College, and includes:
  - biographical information, including Education Data (where you are a member of our alumni), information relating to your involvement in sports teams, clubs and societies whilst at Oxford and subsequently, employment, career and professional activities (including salary/salary band), your interests, activities, accolades, honours and life achievements, your profile picture taken from publicly accessible sources (subject to copyright), and links to your social media or other online presence;
  - details of your ongoing relationship, engagement and communication preferences with us, including your interactions and communications with us, details of your involvement in fundraising activities, details of your attendance (and that of your guests) at events, details of benefits and services provided to you (including your use of College or University libraries, careers services or other facilities), your connections to others within the collegiate University community, membership of College or University social media groups, record of your voluntary support such as advice or mentorship or voluntary work you have undertaken;
  - information about your giving (including both financial and non-financial gifts such as library donations), including current and past donations and pledges, documentation relating to these gifts and records of projects you have supported, an indication of your intent to leave a legacy including copies of your wills, your requests for anonymity in relation to your giving, thank you letters or donor reports, correspondence and notes of meetings relating to your gifts, plans for activities and future interactions, records of membership of any societies or groups related to your giving, your relationship to friends and patrons groups associated with the University, and your relationship to relevant trusts, foundations and corporates;
  - information relating to your willingness or financial capacity to support our charitable objectives, including our understanding of your likely philanthropic interests and a note of projects we consider may be of interest to you, information about your giving to other organisations information which may give an indication of the scale of any potential philanthropic gift (such as information about earnings and assets, property or publicly reported estimates of wealth), estimates of potential scale of support based on this information and your previous giving, and personal recommendations that you may be willing and able to provide support;
  - information relating to your use of our facilities and accommodation;



- your comments, opinions and feedback on our development, programmes and events and any other information expressed in communications between you and us.
- **Archive Data** includes information relating to our archives, including access and usage information, donations and enquiries relating to our archives.

We refer to the above categories of data in the [Purposes for which we will use your personal data tables](#).

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We may collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Much of this information is provided by way of **Welfare Data** and identified as such in our information tables. This may include information about criminal convictions and offences. Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. All such information is collected in accordance with this privacy policy. We have in place appropriate policy documents and/or other safeguards which we are required by law to maintain when processing such data.

#### If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, your student contract or employment contract). In this case, we may have to terminate the contract you have with us but we will notify you if this is the case at the time.

Where we need to collect personal data from you or your school to enable you or your school to participate in our access and outreach programmes and you fail to provide that data when requested, we may not be able to enrol you or your school in our programmes or events.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial, Education, Professional, Welfare, Accommodation, Pensions, Alumni, Donor and Supporter Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - enrol with us;
  - apply for a job at St John's College;
  - apply to take part in any of our access and outreach programmes;
  - make a donation to St John's College;



- request access to our library or archive;
- enquire, book or make a payment to us for events or services; or
- give us some feedback.

- **Automated technologies or interactions.** As you interact with our websites (including the main College website and linked sites), we may automatically collect **Technical Data** about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details. We may also generate Technical Data about you where you use a fob or swipe card to access our premises, in which case our access control system will generate a log of your attendance.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below. These sources are based inside the UK save where otherwise stated:
  - Education, Accommodation and Welfare Data that we and our staff generate about you, such as during tutorials and in connection with your attendance and accommodation at St John's College;
  - Professional and Welfare Data that we generate about you during your employment or senior membership with us;
  - Archive Data that we generate about you as you interact with our archives;
  - Identity, Education, Welfare, Financial and Alumni, Donor and Supporter Data from the University of Oxford and other Oxford colleges you may have attended that participate in our shared relationship management system (DARS);
  - Professional Data from your previous educational establishments or employers (based inside or outside the UK, as applicable);
  - Financial and Pensions Data that we generate about you as your employer and pursuant to the administration of SPCSPF or other employee benefits;
  - Financial Data from third parties (e.g. parents) that provide financial support to our students;
  - Alumni, Donor and Supporter Data from publicly available sources such as social media or other online platforms or press, or from third party partners who undertake research on our behalf;
  - Data from your fellow students, family members, friends, visitors to St John's College, event attendees, donors to our archives and other contacts who may provide us with information about you if they contact us or vice versa (based inside or outside the UK, as applicable);
  - From your internet service provider, any data you submit while using remote access services from outside of the University Network (based inside or outside the UK, as applicable);
  - Technical and Usage Data that we generate in the course of operating our IT systems, or that we obtain from our third-party suppliers;
  - Technical Data from analytics providers such as Google based outside the UK;
  - Financial and Transaction Data from banks and providers of technical and payment services.



#### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

[Click here to find out more about the types of lawful basis that we will rely on to process your personal data.](#)

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#).

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Our tables are broken down into categories, so that you can review the section(s) most relevant to you:

- [Students and applicants](#)
- [Employees and applicants for employment or senior membership](#)
- [St John's College Staff Pension Fund members](#)
- [Next of kin or other emergency contacts](#)
- [Alumni, donors and supporters](#)
- [Archives](#)
- [Conferences & events](#)
- [Contractors, suppliers and property management](#)
- [Outreach programme](#)
- [Inspire Digital Hub](#)



- [Information technology](#)
- [Security & CCTV](#)
- [Website users](#)

In some cases, more than one section may be relevant to you (for example, if you have applied for a job with us and also used our website, or if you are a donor and have also attended an event with us). Please [contact us](#) if you have any queries as to which section(s) apply to you.



## STUDENTS AND APPLICANTS

If you are a student of St John's College, or have applied to study or visit an open day at St John's College, this section will be relevant to you.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To provide prospective students with information about St John's College, including to:</p> <p>(a) enable us to communicate with prospective students and answer queries</p> <p>(b) enable us to run open days at St John's College and provide accommodation</p>	<p>(a) Identity (b) Contact (c) Application (d) Welfare (e) Financial (f) Transaction (g) Marketing and Communications (h) Accommodation</p>	Necessary for our legitimate interests (to provide prospective students with information about St John's College, respond to any queries they may have and enable them to attend open days to learn more about us and college life before deciding whether to apply)
<p>To:</p> <p>(a) consider your application*;</p> <p>(b) make a decision regarding your admission;</p> <p>(c) communicate our decision to you (including any conditions on any offer we may make) and provide you with feedback;</p> <p>(d) record whether you meet the conditions of any offers we have made and whether you decide to enrol with us;</p> <p>(e) make reasonable adjustments;</p>	<p>(a) Identity (b) Contact (c) Application (d) Welfare (e) Financial</p>	<p>(a) Necessary for our legitimate interests (to consider the suitability of our applicants)</p> <p>(b) Necessary to comply with a legal obligation</p>



<p>(f) conduct equal opportunities monitoring;</p> <p>(g) consider and make decisions about whether any criminal conviction poses an unacceptable risk in our collegiate university environment**.</p> <p>* As part of our decision making process, we may consider contextual information (including Identity, Education and Welfare Data, specifically information relating to your school, postcode and care background). Further information on this process is <a href="#">available here</a>.</p> <p>** More information is available <a href="#">for undergraduate admissions here</a>, and <a href="#">for graduate admissions here</a>.</p>		
To consider your application for financial support (including bursaries, scholarships and hardship funds)	(a) Identity (b) Contact (c) Application (d) Welfare (e) Financial	Necessary for our legitimate interests (to enable prospective students to fund their studies)
To register you as a student and provide you with teaching and ancillary services	(a) Identity (b) Contact (c) Application (d) Education (e) Welfare (f) Financial	Performance of the student contract



To check your entitlement to study, support you with visa applications and extensions and to share this information with the University of Oxford to enable it to report to the Home Office pursuant to its obligations under immigration law	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary to comply with a legal obligation
To provide you with accommodation and ensure that it meets your needs and requirements, and to operate such accommodation safely and efficiently	(a) Identity (b) Contact (c) Education (d) Accommodation (e) Welfare (r) Financial (g) Transaction	(a) Performance of the student contract (b) Necessary for our legitimate interests (to ensure the safe and efficient operation of our accommodation and ensure that our accommodation is suitable for our students' needs and requirements)
To provide you with catering	(a) Identity (b) Contact (c) Welfare (d) Financial (e) Transaction	(a) Performance of the student contract; (b) Necessary to comply with a legal obligation; (c) Necessary for our legitimate interests (ensuring that you have an appropriate service on an ongoing basis).
To: (a) provide you with trips and events (including overseas);	(a) Identity (b) Contact	(a) Performance of the student contract; (b) Necessary for our legitimate interests (to arrange cultural events for the benefit of our



(b) Make necessary arrangements to present candidates at University graduation ceremonies and related events.	(c) Education (d) Accommodation (e) Welfare (f) Financial (g) Transaction	students).
To consider nominations for and administer prizes, scholarships and awards (including from third party donors).	(a) Identity (b) Contact (c) Education (d) Financial (e) Transaction	Necessary for our legitimate interests (to make awards and award scholarships and prizes to students, and fulfil the wishes of benefactors).
To provide you with use of library, laundry, sporting and other facilities, and enable you to book rooms and facilities for events (including as part of student societies) and take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, students and employees of St John's College and for visiting speakers.	(a) Identity (b) Contact (c) Education (d) Welfare (e) Financial (f) Transaction	(a) Necessary to comply with a legal obligation; (b) Necessary for our legitimate interests (to make rooms and facilities available to our students to enhance their educational and extra-curricular activities).
To: (a) protect and ensure your health, safety and welfare during your enrolment with us (including during any medical emergencies) and to provide	(a) Identity (b) Contact (c) Welfare	(a) Necessary for our legitimate interests (ensuring the safety of our students, staff and visitors, to ensure that our students have access to support and counselling services, to consider your health, wellbeing or ability to participate when we make



<p>you with support and counselling and access to the College nurse or other subscribed student assistance programmes;</p> <p>(b) consider your personal circumstances and make reasonable adjustments (including in relation to accommodation, teaching and catering) and consider and make decisions about any requests for assistance (such as alternative examination arrangements, extensions to written work and submission of mitigating circumstances);</p> <p>(c) conduct equal opportunities monitoring.</p>	<p>(d) Application (e) Education (f) Accommodation</p>	<p>decisions, and to monitor and promote equality of opportunity);</p> <p>(b) Necessary to comply with a legal obligation.</p>
<p>To:</p> <p>(a) Manage payments, fees and charges (including to understand your fee status, determine the level of fees you will be required to pay and verify that you will meet the requirement to pay fees);</p> <p>(b) Collect and recover money owed to us;</p> <p>(c) Collect fees from you on behalf of the University of Oxford;</p> <p>(c) Make payment to you or provide you with another benefit (for example, where you are owed a refund or we otherwise owe you money or benefits such as where you work for us, e.g. as student helpers).</p> <p>This applies to our fees and any other costs you may pay to us (such as for accommodation,</p>	<p>(a) Identity (b) Contact (c) Education (d) Accommodation (e) Welfare (f) Financial (g) Transaction (h) Marketing and Communications</p>	<p>(a) Performance of the student contract; (b) Necessary to comply with a legal obligation; (c) Necessary for our legitimate interests (to recover debts due to us).</p>



catering, events and library charges).		
To consider and administer any changes you request to your course, such as optional modules, withdrawals, suspension or a change in course	(a) Identity (b) Contact (c) Education	Necessary for our legitimate interest (to make decisions about your requests in accordance with our policies and procedures)
To handle grievances, disciplinaries, harassment allegations or other complaints made by you or that otherwise involve you	(a) Identity (b) Contact (c) Education (d) Welfare	(a) Performance of the student contract; (b) Necessary for our legitimate interests (to operate disciplinary, harassment and grievance procedures in accordance with St John's College procedures).
To provide references	(a) Identity (b) Contact (c) Professional (d) Welfare	(a) Necessary for our legitimate interests (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, to maintain a record of the college's activities and maintain such record for future research).
To maintain records of St John's College cultural life	(a) Identity (b) Contact (c) Education	Necessary for our legitimate interests (maintaining a record of cultural life including for researchers and future students).
To conduct and operate College committee meetings	(a) Identity (b) Contact (c) Education	Necessary for our legitimate interests (to have student representatives on certain committees and retain records of committee meetings).



To contact you to inform you about events and provide you with other information about St John's College and the University of Oxford	(a) Identity (b) Contact (c) Accommodation (d) Marketing and Communications	Necessary for our legitimate interests (to provide students with information that may be of interest including relating to events).
To conduct marketing campaigns, which may include making use of photographs of our students or quotations about their experience	(a) Identity (b) Contact (c) Education	Necessary for our legitimate interests (to conduct marketing).
To manage our relationship with you which will include notifying you about changes to our terms, policies and procedures.	(a) Identity (b) Contact (c) Profile (d) Marketing and communications	(a) Performance of the student contract; (b) Necessary to comply with a legal obligation.
To maintain records for archiving purposes, or where required by law (for example, pursuant to requests made under data protection 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).	The College may retain various records comprising various types of personal data from all categories defined above for these purposes. However, please note that data is regularly securely deleted or otherwise disposed of in accordance with our retention procedures and data protection law, and information is not retained save where we consider this genuinely necessary or legitimate for legal or archiving purposes.	(a) Necessary for our legitimate interests (to maintain an archive of activities as part of a long, established university with a strong identity, history and research tradition, and to maintain such records for future research; and (b) Necessary to comply with a legal obligation.



## EMPLOYEES AND APPLICANTS FOR EMPLOYMENT OR SENIOR MEMBERSHIP

If you are an employee or have applied for a job or senior membership at St John's College, this section will be relevant to you. This notice does not form part of any contract of employment. When we refer to the employment contract within this table, this includes a contract for senior membership, where applicable.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To:</p> <ul style="list-style-type: none"><li>(a) consider and administer your application;</li><li>(b) consider any criminal convictions you disclose to us and review the results of your DBS check;</li><li>(c) comply with immigration law;</li><li>(d) conduct equal opportunities monitoring*;</li><li>(e) enable us to make appropriate adjustments for you during the recruitment process;</li><li>(f) archive our records.</li></ul> <p>*Please note that where possible, we will conduct such activities on an anonymised basis.</p>	<ul style="list-style-type: none"><li>(a) Identity</li><li>(b) Contact</li><li>(c) Professional</li><li>(d) Welfare</li></ul>	<ul style="list-style-type: none"><li>(a) Performance of the employment contract (to enable us to take steps to enter into such contract with you);</li><li>(b) Necessary to comply with a legal obligation;</li><li>(c) Necessary for our legitimate interests (to consider suitability of applicants and to maintain and archive a record of St John's College's recruitment activities).</li></ul>
To engage you as our employee and conduct right to work and immigration checks	<ul style="list-style-type: none"><li>(a) Identity</li><li>(b) Contact</li><li>(c) Professional</li></ul>	<ul style="list-style-type: none"><li>(a) Performance of the employment contract;</li><li>(b) Necessary to comply with a legal obligation.</li></ul>



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
	(d) Welfare (e) Financial (f) Transaction	
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"><li>(a) to pay and monitor salary, expenses, PAYE, pension contributions;</li><li>(b) to provide you with benefits;</li><li>(c) to manage grievance, disciplinary and capability matters;</li><li>(d) to manage your probationary period;</li><li>(e) to provide and manage housing;</li><li>(f) to administer promotion applications, awards and long service awards;</li><li>(g) notifying you about changes to our policies and procedures;</li><li>(h) to provide you with appropriate resources such as library access and room bookings;</li><li>(i) providing you with catering, events and meal bookings;</li></ul>	<ul style="list-style-type: none"><li>(a) Identity</li><li>(b) Contact</li><li>(c) Professional</li><li>(d) Welfare</li><li>(e) Financial</li><li>(f) Pension</li></ul>	<ul style="list-style-type: none"><li>(a) Performance of the employment contract or housing related contract we have with you;</li><li>(b) Necessary to comply with a legal obligation;</li><li>(c) Necessary for our legitimate interests in respect of:<ul style="list-style-type: none"><li>ensuring appropriate use of our expense system;</li><li>ensuring that you receive appropriate catering services on an ongoing basis;</li><li>pension contributions to enable the pension provider to operate the pension in accordance with the scheme and your and their respective rights and obligations;</li><li>understanding when your interests conflict with those of St John's College and when you will be unable to contribute to management and/or decisions;</li><li>holding an up-to-date record of your learning and development achievements for workforce planning and recognition;</li><li>the proper investigation and handling of relevant complaints, disputes, grievances and disciplinary</li></ul></li></ul>



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>(j) providing you with occupational health services;</p> <p>(k) processing conflict of interest declarations;</p> <p>(l) to plan teaching services and manage your absence records (including holiday, sickness, sabbatical, maternity/paternity/parental leave, time off for dependents, career breaks and other absences);</p> <p>(m) to manage research project and funding applications and renewals;</p> <p>(n) to give references about you;</p> <p>(o) to manage leave and buyout requests;</p> <p>(p) to administer joint equity schemes;</p> <p>(q) to administer SCR membership;</p> <p>(r) to manage the end of your employment.</p>		<p>matters;</p> <p>management of College facilities;</p> <p>monitoring and managing the availability and timekeeping of employees and casual workers;</p> <p>recording the research activities of our employees and identifying sources of funding they receive and supporting applications for funding;</p> <p>providing references about our former staff;</p> <p>understanding why our employees leave and handling any redundancy or termination related queries.</p>
<p>To:</p> <p>(a) ensure health and safety and security (including by way of access control records, security incidents, accident reports and health and safety logs);</p> <p>(b) contact your emergency contact in the event of an emergency or where there is significant concern for your welfare;</p> <p>(c) make reasonable adjustments for you;</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Professional</p> <p>(d) Welfare</p>	<p>(a) Performance of the employment contract;</p> <p>(b) Necessary to comply with a legal obligation;</p> <p>(c) Necessary for our legitimate interests (health and safety management, ensuring the security of our premises and excluding non-authorised individuals, archiving a visual record of employees and office holders, creating historical archives regarding College life and recording pastoral care information to ensure the proper functioning of our</p>



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
(d) enable identification of staff and office holders for security purposes, and to publish images of staff and office holders to enable identification by others;  (e) take and maintain photographs of college life, including at events and societies;  (f) maintain records of student advisees and tutor groups for pastoral care purposes (including details of your pastoral responsibilities, advisees, interventions and advice).		pastoral care system and handle complaints in relation thereto).
To enable you to provide feedback on students and participate in College administrative meetings, and to enable us to keep a formal record of matters relating to the administration and management of College business and to archive this information.	(a) Identity (b) Contact (c) Professional	(a) Processing is necessary for the performance of a task carried out in the public interest;  (b) Processing is necessary for our legitimate interests (in compiling a record of teaching, administrative and managerial matters, decisions and outcomes, and archiving such records).
To maintain records of St John's College cultural life	(a) Identity (b) Contact (c) Professional	Necessary for our legitimate interests (maintaining a record of cultural life including for researchers and future students).
To contact you to inform you about events and provide you with other information about St John's	(a) Identity	Necessary for our legitimate interests (to provide you with information that may be of interest



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
College and the University of Oxford	(b) Contact (c) Professional (d) Marketing and Communications	including relating to events).
To conduct marketing campaigns, which may include making use of photographs of our staff and senior members	(a) Identity (b) Contact (c) Professional	Necessary for our legitimate interests (to conduct marketing).
To manage our relationship with you which will include notifying you about changes to our terms, policies and procedures.	(a) Identity (b) Contact (c) Profile (d) Marketing and communications	(a) Performance of the employment contract; (b) Necessary to comply with a legal obligation.
To maintain records for archiving purposes, or where required by law (for example, pursuant to requests made under data protection 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).	The College may retain various records comprising various types of personal data from all categories defined above for these purposes. However, please note that data is regularly securely deleted or otherwise disposed of in accordance with our retention procedures and data protection law, and	(a) Necessary for our legitimate interests (to maintain an archive of activities as part of a long, established university with a strong identity, history and research tradition, and to maintain such records for future research; and (b) Necessary to comply with a legal obligation.



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
	information is not retained save where we consider this genuinely necessary or legitimate for legal or archiving purposes.	



## ST JOHN'S COLLEGE STAFF PENSION FUND (SJCSPF)

If you are a current member, deferred member, pensioner or individual who have opted out of membership this section will be relevant to you. The administration of the Staff Pension Fund is handled by Aon, please refer to Aon Solutions UK Limited Privacy Notice appended below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To administer member benefits	(a) Identity (b) Contact (c) Financial (d) Pensions (e) Welfare (f) Transaction	(a) Performance of a contract (b) Necessary for our legitimate interests (to enable the pension provider to operate the pension in accordance with the scheme and your and their respective rights and obligations)
To verify eligibility for membership, salary, working hours, absences	(a) Identity (b) Contact (c) Financial (d) Pensions (e) Welfare (f) Transaction	(a) Performance of a contract (b) Necessary for our legitimate interests (to enable the pension provider to operate the pension in accordance with the scheme and your and their respective rights and obligations)
To pay pensioners and dependants	(a) Identity	(a) Performance of a contract (b) Necessary for our legitimate interests (to enable



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
	(b) Contact (c) Financial (d) Pensions (e) Transaction	the pension provider to operate the pension in accordance with the scheme and your and their respective rights and obligations)
To administer member AVC funds	(a) Identity (b) Contact (c) Financial (d) Pensions (e) Transaction	(a) Performance of a contract (b) Necessary for our legitimate interests (to enable the pension provider to operate the pension in accordance with the scheme and your and their respective rights and obligations)



## AON SOLUTIONS UK LIMITED PRIVACY NOTICE

Aon Solutions UK Limited (and, where appointed, the Scheme Actuary – together “Aon”) has been appointed to provide pensions advisory and calculation services that relate to your membership of the St John’s College Staff Pension Fund (SJCSFP). In doing so, Aon will use personal information about you, such as your name and contact details, information about your pension contributions, age of retirement, and in some limited circumstances information about your health (where this impacts your retirement age) in order to be able to provide these services. The purposes for which we use personal information will include management of the pension scheme and your membership within it, funding the pension scheme (i.e. helping to ensure that the funds within the pension scheme are sufficient to cover the members who are party to it), liability management (that is to say providing advice on the different ways benefits could be determined, and drawn, from the pension scheme), scheme actuary duties (which include assessing individuals who are members of the pension scheme and assessing how the make-up of the membership may affect the amounts payable and when they become payable so as to manage the pension scheme appropriately), regulatory compliance, process and service improvement and benchmarking.

We may pass your personal details to third parties such as financial advisors and benefits providers, insurers, our affiliates and service providers and to certain regulatory bodies where legally required to do so. Depending on the circumstances, this may involve a transfer of data outside the UK and the European Economic Area to countries that have less robust data protection laws. Any such transfer will be made with appropriate safeguards in place.

More detail about Aon’s use of your personal information is set out in the [full Privacy Notice](#), or you can request a copy by contacting us, including reference to the scheme name:

Data Protection Officer, Aon Solutions UK Limited (Retirement and Investment UK), PO Box 730, Redhill, RH1 9FH



## NEXT OF KIN AND EMERGENCY CONTACTS

If you are an emergency contact or next of kin to a student, employee or visitor at St John's College, this section will be relevant to you.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To record your details when they are provided to us by our students, employees or visitors, and to contact you in the event of an emergency or concern	(a) Identity (b) Contact	Necessary for our legitimate interests and those of the individual who has provided your details to us (to ensure the safety of such individual and to contact you in the event of a concern for their health or welfare)



## ALUMNI, DONORS AND SUPPORTERS

If you are part of our alumni or are a donor or supporter of St John's College, this section will be relevant to you. Development and Alumni Relations teams across the collegiate University work closely together and have aligned privacy policies to provide clarity for our alumni, donors and supporters. Please refer to the [University's privacy notices](#) relating to other activities and relationships.

St John's Colleges utilises a shared relationship management system known as DARS (Development and Alumni Relations System) to store and share data across the collegiate University of Oxford. St John's is therefore a [joint data controller](#) of your personal data, together with the University of Oxford and other participating colleges.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To:</p> <p>(a) keep a record of the fact that you attended St John's College and are part of our alumni;</p> <p>(b) provide a record of your interactions and contributions to College and University life</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Alumni, Donor and Supporter</p>	<p>(a) Performance of a contract</p> <p>(b) Necessary for our legitimate interests (to maintain records of College life).</p>
<p>For alumni and supporter engagement and to correspond with you, including to:</p> <p>(a) offer and manage a varied programme of events tailored to your interests and to contact you about these events to enable you to participate, and to provide catering at such events and make reasonable adjustments for you;</p> <p>(b) manage payments, fees and charges in relation to alumni events and services;</p> <p>(c) to contact you in relation to alumni news and</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p> <p>(e) Alumni, Donor and Supporter</p> <p>(f) Marketing and Communications</p> <p>(g) Welfare</p>	<p>(a) Performance of a contract;</p> <p>(b) Necessary to comply with a legal obligation;</p> <p>(c) Necessary for our legitimate interests (to facilitate contact with our alumni, keep our alumni up to date with relevant news, events and opportunities and to engage with them for the continued benefit of the College and our current students, and to pursue a long term relationship with our alumni).</p> <p>(d) Consent to the processing for one or more</p>



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>events and provide you with information about benefits and services, including access to the University of Oxford Careers Service;</p> <p>(d) inform you of volunteering opportunities;</p> <p>(e) to accept and process commercial revenue;</p> <p>(f) understand your interests, circumstances and occupation to deepen our relationship with you.</p>		specific purposes
To identify and profile potential volunteers, alumni ambassadors and event attendees	(a) Identity (b) Contact (c) Alumni, Donor and Supporter (d) Marketing and Communications	Necessary for our legitimate interests (to identify potential volunteers, alumni, ambassadors and event attendees in pursuance of our fundraising and development activities)
To create classifications and groupings (through manual or automated analyses) in order to best direct engagement and fundraising activities, and to analyse the success of our engagement and fundraising activities, collect feedback and manage complaints	(a) Identity (b) Contact (c) Alumni, Donor and Supporter (d) Marketing and Communications	Necessary for our legitimate interests (to conduct statistical analysis of our activities and donor base, to make forecasts and predictions about philanthropic activity, gauge levels of support and ensure our messaging is timely and relevant)
For fundraising and donor stewardship, including: (a) to help ensure that our fundraising efforts and conducted efficiently, that our approaches are	(a) Identity (b) Contact (c) Alumni, Donor and Supporter	Necessary for our legitimate interests (to manage, administer and improve our fundraising activities, including seeking donations)



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>respectful, professional and based on evidence and our understanding of what may interest you;</p> <p>(b) to request your support on fundraising programmes, always mindful of fundraising best practice and according to the <a href="#">Fundraising Promise</a>;</p> <p>(c) to accept and process philanthropic revenue;</p> <p>(d) to provide acknowledgement, recognition and stewardship of your gift, and to inform you of the impact of your gift;</p> <p>(e) to support peer-to-peer fundraising campaigns;</p> <p>(f) to inform our fundraising, marketing and donor stewardship strategies.</p>	<p>(d) Financial</p> <p>(e) Transaction</p> <p>(f) Marketing and Communications</p>	
<p>To fundraise for major gifts, including:</p> <p>(a) to use publicly available information and recommendations to identify you if we believe you have the interest and financial capacity to make a major gift;</p> <p>(b) where we have reason to think a potential donor may possess an interest and financial capacity to donate we may research and collate additional information from sources in the public domain concerning a potential donor's interests, philanthropic activity, financial capacity and networks in order to substantiate this;</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Alumni, Donor and Supporter</p> <p>(d) Financial</p> <p>(e) Transaction</p> <p>(f) Marketing and Communications</p>	<p>(a) To comply with a legal obligation;</p> <p>(b) Necessary for our legitimate interests (to manage, administer and improve our fundraising activities, including seeking donations)</p>



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>(c) to collate information into a briefing or profile to assist our planning of an approach to you to discuss your interest in our work and supporting it;</p> <p>(d) to carry out due diligence on potential donors using publicly available information.</p> <p>We may undertake the above research ourselves or use the services of a third-party partner.</p> <p>Where this activity is being undertaken for a new contact with whom we have no previous relationship, we will provide the individual link to this privacy notice as part of our initial engagement.</p>		
To process and administer donations and gifts (including legacies made in wills), and to thank our donors and legators, and to record the source of monies received, wishes of donors and maintain an accurate record of support provided to the College.	(a) Identity (b) Contact (c) Alumni, Donor and Supporter (d) Financial (e) Transaction (f) Marketing and Communications	(a) Necessary to comply with a legal obligation; (b) Necessary for our legitimate interests (to seek and administer donations and to thank donors, legators and their families, maintain materials to demonstrate the College's interest in such funds, retaining records of support provided to the College).
To record prizes, scholarships and bursaries awarded and to provide updates to our donors regarding the use of their donations, and to facilitate communications between communities of	(a) Identity (b) Contact (c) Alumni, Donor and Supporter	(a) Necessary for our legitimate interests (to record and detain data on monies distributed and holding information pertinent to the ongoing deep relationship and communications between us and



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
scholars, donors and recipients.	(d) Financial (e) Transaction (f) Marketing and Communications	our donors). (b) Necessary for the legitimate interests of our donors (to understand the use(s) to which their contributions are put).
To conduct operational reporting and to produce management information and for other relevant purposes relating to the governance of the collegiate University.	(a) Identity (b) Contact (c) Alumni, Donor and Supporter (d) Financial (e) Transaction	Necessary for our legitimate interests (to keep records of management information).
To publish your name in an online directory, in donor listings, as part of a guestlist, press releases or case studies to be included in our publications or websites	(a) Identity (b) Alumni, Donor and Supporter	Consent
To maintain a record of alumni achievements and life events	(a) Identity (b) Contact (c) Welfare (d) Financial (e) Transaction (f) Alumni, Donor and Supporter	Necessary for our legitimate interests (to recognise the achievements of our alumni, both within our records and at a public level).



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enable you to use College facilities and to record your use of such facilities	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Alumni, Donor and Supporter	Necessary for our legitimate interests (to ensure the proper operation of College facilities) and necessary for your legitimate interests (to enable you to access such facilities).
To use your comments and feedback to guide College development activities	(a) Identity (b) Contact (c) Alumni, Donor and Supporter	Necessary for our legitimate interests (to operate a proactive, positive and engaged development programme).
To maintain records of St John's College cultural life	(a) Identity (b) Contact (c) Alumni, Donor and Supporter	Necessary for our legitimate interests (maintaining a record of cultural life including for researchers and future students).
To manage our relationship with you which will include:  (a) Notifying you about changes to our terms or privacy policy;  (b) Undertaking surveys and market research.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Alumni, Donor and Supporter	(a) Necessary to comply with a legal obligation  (b) Necessary for our legitimate interests (to keep our records updated and to study how alumni, donors and supporters use our services and engage with us)
To maintain records for archiving purposes, or	The College may retain various	(a) Necessary for our legitimate interests (to



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
where required by law (for example, pursuant to requests made under data protection 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).	records comprising various types of personal data from all categories defined above for these purposes. However, please note that data is regularly securely deleted or otherwise disposed of in accordance with our retention procedures and data protection law, and information is not retained save where we consider this genuinely necessary or legitimate for legal or archiving purposes.	maintain an archive of activities as part of a long, established university with a strong identity, history and research tradition, and to maintain such records for future research; and (b) Necessary to comply with a legal obligation.

If you want to provide updates to your data, make any changes to your communication preferences or exercise any of your rights as outlined in this privacy policy, please contact us at one of the following addresses:

Development and Alumni Relations Office

St John's College

St Giles

Oxford OX1 3JP

United Kingdom

Email: [alumni@sjc.ox.ac.uk](mailto:alumni@sjc.ox.ac.uk)



University Development and Alumni Relations Database Team

University of Oxford Development Office

University Office

Wellington Square

Oxford OX1 2JD

United Kingdom

Email: [database@devoff.ox.ac.uk](mailto:database@devoff.ox.ac.uk)

Phone: +44 (0)1865 611530

*If possible, please quote your Alumni Number*

If you have registered with [Oxford Alumni Online](#), either via the central University Alumni Office or via your college, you can [login](#) and update your communication preferences at any time



## ARCHIVES

If you are a former student, current or former member of staff or officer of St John's college, an individual who has donated items to our archives, a researcher who has accessed our archive or a third party referred to in records held in our archives, this section will be relevant to you.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To maintain a record of how our archives have been used and who has previously used them, refer back to earlier enquiries on similar topics and for the security of the collection	(a) Identity (b) Contact (c) Welfare (d) Archive	Necessary for our legitimate interests (to maintain the integrity of our archives, to ensure they are kept securely and are available as a resource)
To maintain records of St John's College cultural life	(a) Identity (b) Contact (c) Education (d) Professional (e) Alumni, Donor and Supporter	Necessary for our legitimate interests (maintaining a record of cultural life including for researchers and future students)
To maintain a record of conservation measures applied to items in our archive to help with future conservation	(a) Identity (b) Archive	Necessary for our legitimate interests (to maintain records of conservation measures)



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To accept and maintain papers and collections of significance to the College or which are otherwise of importance as an archive	(a) Identity (b) Contact (c) Transaction (d) Archive	Necessary for our legitimate interests (to receive collections and papers for our archives) and necessary for the legitimate interests of our donors (to give collections and papers to the College)
To maintain a record of the content of our archive and how it was acquired and to deal with subsequent enquiries about the archived item(s)	(a) Identity (b) Contact (c) Archive	Necessary for our legitimate interests (to record, index and catalogue the College's archive acquisitions)
To maintain a record of academic conferences, seminars and lectures hosted and/or organised by St John's College	(a) Identity (b) Contact (c) Education (d) Professional (e) Archive	Necessary for our legitimate interests (to record and maintain an archive of past conferences, seminars and lectures)
To maintain a record of past student results, as a record of their academic progression and to provide references or verification of attendance, and to maintain the archive of former students to historically document the College's teaching function and for purposes of future research	(a) Identity (b) Contact (c) Education (d) Archive	(a) Performance of a contract with you; (b) Necessary for our legitimate interests (to maintain a record of College activities as part of a long established university with a strong identity and history, and to maintain records for future research); (c) Necessary for the performance of a task carried



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
		out in the public interest
To maintain historic records of college employees (both academic and professional for the archive, and in case we are approached for references	(a) Identity (b) Contact (c) Professional	(a) Necessary for our legitimate interests (to maintain a record of activities as part of a long established university with a strong identity and history, and to maintain records for future research); (b) Necessary for the legitimate interests of our former employees and other parties (to enable us to provide references for former staff)
To maintain a historic record of St John's College administration	(a) Identity (b) Contact	Necessary for our legitimate interests (to maintain a record of activities as part of a long established university with a strong identity and history, and to maintain records for future research)
To maintain a historic record of College finances and assets	(a) Identity (b) Financial	Necessary for our legitimate interests (to maintain a record of activities as part of a long established university with a strong identity and history, and to maintain records for future research)
To maintain a historic record of College architecture, and to assist future conservation of College buildings	(a) Identity	(a) Necessary for our legitimate interests (to maintain historic buildings and to maintain a record of activities as part of a long established university with a strong identity and history, and to maintain



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
		records for future research)
To maintain a historic record of governance documents relating to the college	(a) Identity (b) Contact	Necessary for our legitimate interests (to maintain a record of governance documents for future reference)
To maintain a record of how our library collections have been used and who has previously used them (including accessibility information where applicable), so that we can monitor the use and integrity of our library collections. This information is also retained for earlier enquiries on similar topics and for the security of the collections.	(a) Identity (b) Contact (c) Welfare (d) Archive	Necessary for our legitimate interests (to maintain the integrity of library collections, to ensure they are kept securely and are available as a resource)

We may also retain data in our archives as indicated elsewhere in this Privacy Policy where directly relevant to specific categories of individuals.

Our archives may be consulted by researchers, with our permission and subject to the requirement that data relating to living individuals will only be made available to researchers carrying out historical or statistical research who have agreed to use the data in any publications or outputs anonymously.



## CONFERENCES AND EVENTS

If you are an attendee, organiser or are or have been otherwise involved in St John's College conferences or events this section will be relevant to you.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To communicate with you about events and conferences you are attending, have expressed an interest in or may have an interest in	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you; (b) Necessary for our legitimate interests (to market additional events to you)
To monitor the attendance of people on college premises, as part of the college's safety and security arrangements	(a) Identity (b) Welfare (c) Technical (d) additional information relating to a bespoke event, preferences and plans	Necessary for our legitimate interests (to restrict access to college property to authorised persons, to monitor the attendance of people on college premises and to maintain a record of incidents occurring on College property)
To enable the proper management of College events and ensure that we have an accurate record of attendance at college events and to enable us (where permitted) to inform you of additional	(a) Identity (b) Contact (c) Marketing and	(a) Performance of a contract with you; (b) Necessary for our legitimate interests (to assess the popularity and impact of college events, plan



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
events which may be of interest to you and inform the planning of future event	Communications (d) additional information relating to a bespoke event, preferences and plans	future events and make details of planned events available to parties likely to be interested in attending)
To manage meal bookings, provide you with catering and make reasonable adjustments when planning events	(a) Identity (b) Contact (c) Welfare (d) additional information relating to a bespoke event, preferences and plans	(a) Necessary to comply with a legal obligation; (b) Necessary for our legitimate interests (ensuring that you have an appropriate service and treatment in your interactions with us).
To understand the views and concerns of attendees at our events to guide the planning of future activities and to record correspondence with our attendees	(a) Identity (b) Contact (c) additional information relating to a bespoke event, preferences and plans	Necessary for our legitimate interest (to proactively manage our events programme and to keep a record of correspondence with our attendees)
To: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you; (b) Necessary for our legitimate interests (to recover debts due to us)



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To:</p> <ul style="list-style-type: none"><li>(a) maintain a record of College events;</li><li>(b) enter materials relating to events into archive;</li><li>(c) advertise activities within the college, both internally and externally</li></ul>	<ul style="list-style-type: none"><li>(a) Identity</li><li>(b) additional information relating to a bespoke event, preferences and plans</li></ul>	Necessary for our legitimate interests (to maintain a record of college life and to market College facilities and opportunities)
To make the college chapel available to current and former staff, students, office-holders, members and others for the purpose of wedding ceremonies	<ul style="list-style-type: none"><li>(a) Identity</li><li>(b) Contact</li><li>(c) additional information relating to your wedding preferences and plans.</li></ul>	<ul style="list-style-type: none"><li>(a) Performance of a contract with you;</li><li>(b) Necessary for our legitimate interest (to enable the nuptials to proceed and record those details on the College archive)</li></ul>
To maintain a record of St John's College administration and management of college property	<ul style="list-style-type: none"><li>(a) Identity</li><li>(b) Contact</li></ul>	<ul style="list-style-type: none"><li>(a) Performance of a contract with you;</li><li>(b) Necessary for our legitimate interest (for managing College facilities, understanding the purpose for which facilities have been reserved and recording the identities of those booking College facilities)</li></ul>
To manage St John's College IT resources	<ul style="list-style-type: none"><li>(a) Identity</li><li>(b) Contact</li><li>(c) Usage</li><li>(d) Profile</li></ul>	Necessary for our legitimate interests (in the proper management of IT resources)



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To manage event bookings and comply with our legal obligations with regard to ensuring freedom of speech within the law is secured for members, students and employees of the College and for visiting members.	(e) Technical  (a) Identity (b) Contact (c) additional information relating to a bespoke event, preferences and plans	Necessary to comply with a legal obligation
To maintain records for archiving purposes, or where required by law (for example, pursuant to requests made under data protection 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).	The College may retain various records comprising various types of personal data from all categories defined above for these purposes. However, please note that data is regularly securely deleted or otherwise disposed of in accordance with our retention procedures and data protection law, and information is not retained save where we consider this genuinely necessary or legitimate for legal or archiving purposes.	(a) Necessary for our legitimate interests (to maintain an archive of activities as part of a long, established university with a strong identity, history and research tradition, and to maintain such records for future research; and  (b) Necessary to comply with a legal obligation.



## CONTRACTORS, SUPPLIERS AND PROPERTY MANAGEMENT

If you are a contractor or supplier to St John's College, or have a relationship with us in connection with property transactions, for accounting, administrative and similar purposes, this section will be relevant to you. This notice does not form part of any contract to provide services.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a supplier or contractor and as part of the College's operations and dealings with suppliers and contractors	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary for our legitimate interests (to engage suppliers and contractors that meet our required standards)
To process payments for events and merchandise, and to process bookings and payments for conferences	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract
To execute and retain title documents, transfers, leases and contracts	(a) Identity	(a) Performance of a contract with you; (b) Necessary for our legitimate interests (to enter into contracts, leases and transfers of land and to manage the College's properties)
To operate the college's bank account and for budgeting and accounting purposes	(a) Identity	(a) Performance of a contract with you; (b) Necessary for our legitimate interests (in



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
	(b) Transaction (c) Financial (d) Contact	operating processes and maintaining records for budgeting, accounting, cashflow, auditing and investment purposes)
To maintain a historic record of College administration	(a) Identity (b) Contact (c) Transaction	Necessary for our legitimate interest (in maintaining historic buildings and maintaining a record of activities as part of a long established university with a strong identity and history, and in maintaining such records for future research)
To maintain records for archiving purposes, or where required by law (for example, pursuant to requests made under data protection 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).	The College may retain various records comprising various types of personal data from all categories defined above for these purposes. However, please note that data is regularly securely deleted or otherwise disposed of in accordance with our retention procedures and data protection law, and information is not retained save where we consider this genuinely necessary or legitimate for legal or archiving purposes.	(a) Necessary for our legitimate interests (to maintain an archive of activities as part of a long, established university with a strong identity, history and research tradition, and to maintain such records for future research; (b) Necessary to comply with a legal obligation.



## OUTREACH PROGRAMME

If you are a pupil, parent, guardian, teacher or member of staff at a school involved in the College's access and outreach programmes, this section will be relevant to you. Where you are aged under 18, we may ask your parent or guardian for their consent also, or for other relevant information required for you to take part safely in our programmes.

For pupils participating in access and outreach activities that we or the University organise aimed at encouraging participation in higher education, an additional privacy notice concerning data entered into the Higher Education Access Tracker (HEAT) is available [here](#).

If you are using the Inspire Digital Hub as part of the Inspire outreach programme, please read the relevant data processing section in this policy.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>For teachers or members of school staff:</p> <p>(a) to advertise, administer and evaluate your participation, or that of your school or pupils, in our programmes;</p> <p>(b) to contact you about events and activities for which you, your pupils or your school may be eligible;</p> <p>(c) to confirm or verify information provided by pupils about their application or participation in our programmes;</p> <p>(d) to maintain a safe and accessible environment for all attendees at college events;</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Application</p> <p>(d) Welfare</p> <p>(e) Transaction</p> <p>(f) Marketing and Communications</p> <p>(g) Profile</p>	<p>(a) Necessary to comply with a legal obligation;</p> <p>(b) Necessary for our legitimate interests in respect of:</p> <p>running and participating in access and outreach programmes;</p> <p>recording involvement of schools and participants in our programmes, and contacting link schools and teachers;</p> <p>retaining contact with link schools and teachers;</p> <p>evaluating our programmes;</p> <p>ensuring that you receive appropriate service on an ongoing basis.</p>



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>(e) to make reasonable adjustments for visitors, including provision of catering that meets the requirements of the individual;</p> <p>(f) to assess usage of our programme materials.</p>		(c) Consent
<p>For participant or prospective participants:</p> <p>(a) to advertise, administer and evaluate your participation in our programmes;</p> <p>(b) to monitor the impact of our programmes, including on different demographic groups;</p> <p>(c) to target our programmes to areas and demographics of greatest need or impact;</p> <p>(d) to maintain a safe and accessible environment for all attendees at college events;</p> <p>(e) to make reasonable adjustments for visitors, including provision of catering that meets the requirements of visitors;</p> <p>(f) to monitor and evaluate our programmes together with data provided by the student or school during the registration process;</p> <p>(g) to make assessment of eligibility of financial or academic awards or bursaries;</p> <p>(h) for engagement data to be shared with teachers running the Inspire programmes.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Welfare</p> <p>(d) Transaction</p> <p>(e) Marketing and Communications</p> <p>(f) Applicant</p>	<p>(a) Necessary to comply with a legal obligation;</p> <p>(b) Necessary for our legitimate interests in respect of:</p> <p>running and participating in access and outreach programmes;</p> <p>recording involvement of participants in our programmes, and contacting participants;</p> <p>evaluating our programmes;</p> <p>ensuring that you receive appropriate service on an ongoing basis.</p> <p>(c) Consent</p>



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>For parents and/or guardians:</p> <p>(a) to advertise, administer and evaluate your participation, or that of your child, in our programmes.</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Marketing and Communications</p>	Necessary for our legitimate interests (to run and host outreach activities and events, for which consent may be required or desirable for under-18s)
To pay or reimburse you for grants or other expenses incurred through our programme.	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p>	Necessary for our legitimate interest (to operate the programme and pay or reimburse individuals) and necessary for the legitimate interests of the individual (to receive payment or reimbursement)



## INSPIRE DIGITAL HUB

If you are a visitor to our Inspire Digital Hub, this section will be relevant to you. The Inspire Digital Hub is hosted on [Avallain.com](https://www.avallain.com). Avallain processes data collected in accordance with their own privacy notice, which you can review - [here](#)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To make available and maintain our Inspire Digital Hub	(a) Identity (b) Contact (c) Technical	(a) Consent; (b) Necessary for our legitimate interests (to ensure the proper functioning of our site)
To administer and protect the Inspire Digital Hub (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for provision of administration and IT services, network security and to prevent fraud); (b) Necessary to comply with a legal obligation
For participants or prospective participants and teachers:  (a) to monitor and evaluate our access and outreach Inspire programmes as detailed in the OUTREACH section of this policy	(a) Identity (b) Contact (c) Usage / Engagement data as part of the Inspire Programmes (d) Marketing and communication (e) Assessment of eligibility for awards and bursaries	(a) Consent (b) Legitimate Interest (to monitor and evaluate the Inspire programmes and provide financial assistance and prioritise educational programmes)



## IT FUNCTIONS

If you are a user St John's College IT systems, email and telephones/mobile devices this section will be relevant to you.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To enable users to login to our systems using their password, to operate and maintain our systems, and for the purpose of:</p> <ul style="list-style-type: none"><li>(a) maintaining the College's networks;</li><li>(b) protecting their integrity;</li><li>(c) investigating computer misuse;</li><li>(d) minimising the risk of misuse recurring;</li><li>(e) managing and operating our systems and controlling who has access to them;</li><li>(f) for troubleshooting purposes and to determine which users are affected by a security incident;</li><li>(g) to monitor and prevent malicious network traffic, suspected access of illegal materials, alleged copyright infringement or violation of University or College regulations.</li></ul> <p>Records might also be used for disciplinary purposes where staff or students have breached College policies.</p>	<ul style="list-style-type: none"><li>(a) Identity</li><li>(b) Profile</li><li>(c) Technical</li><li>(d) Usage</li><li>(e) Contact</li><li>(f) Welfare</li></ul>	<p>(a) Necessary for our legitimate interests (to maintain the integrity of our systems, investigate misuse, to keep a record of access to the system, websites visited and activity to assist with IT security, taking action to prevent misuse recurring and in taking disciplinary action under its contracts with staff or students if appropriate);</p> <p>(b) Necessary to comply with a legal obligation.</p>



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To administer and protect St John's College and our website and other digital resources (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security and to prevent fraud); (b) Necessary to comply with a legal obligation.
For the purpose of:  (a) maintaining the College's networks; (b) protecting their integrity; (c) investigating computer misuse; and (d) minimising the risk of misuse recurring;  Such records might also be used for disciplinary purposes where staff or students have breached College policies.	(a) Identity (b) Profile (c) Technical (d) Usage (e) Contact (f) Welfare	(a) Necessary for our legitimate interests (to maintain the integrity of our systems, investigate misuse and taking action to prevent misuse recurring and in taking disciplinary action under its contracts with staff or students if appropriate); (b) Necessary to comply with a legal obligation.
To ensure we have been invoiced correctly by the provider, and to check that College provided telephones are being used in accordance with College policy.	(a) Identity (b) Contact (c) Usage	Necessary for our legitimate interests in the proper administration of College telephones and in ensuring they are being used correctly.



## SECURITY & CCTV

If you are a member of staff, student, visitor of the College or otherwise interact with St John's College security, including the College Lodge and CCTV systems operated by the College, this section will be relevant to you.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To record and retain CCTV footage for the purposes of providing safety and security on the College's premises and to assist with the prevention and detection of crime or other unlawful activity. Where an incident is recorded we may capture images for the purposes of any investigation by the College or police.	(a) Identity (b) Welfare	(a) Necessary to comply with a legal obligation; (b) Necessary for our legitimate interests (to maintain a safe and secure environment).
To contact staff, students or their emergency contacts in the event of an emergency or to discuss work being undertaken on site	(a) Identity (b) Contact (c) Welfare	Necessary for our legitimate interests (to communicate with others about work being undertaken on site or in the event of an emergency)
To assist in the event of a medical emergency	(a) Identity (b) Welfare	Necessary to protect someone's vital interests when they are incapable of giving consent
To maintain records of who is on the premises for use in the event of a fire or similar emergency, and to prevent unauthorised access to premises and to	(a) Identity (b) Technical	Necessary for our legitimate interests (to maintain College safety and security)



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
issue and maintain a record of who has keys, cards and fobs		
To record accidents occurring on College premises using Saeker Health and Management System and, where appropriate, report these to the relevant regulatory authority	(a) Identity (b) Welfare	(a) Necessary to comply with a legal obligation; (b) Necessary for our legitimate interests (to assist with management of health and safety risks).
To provide rooms and facilities to College members and record details of the person, society or organisation booking the room	(a) Identity (b) Contact (c) Education (d) Professional	Necessary for our legitimate interests (to make rooms available to College members)
For the delivery of mail and parcels	(a) Identity (b) Contact	Necessary for our legitimate interests (in maintaining records to reduce the risk of deliveries being lost after receipt) and the legitimate interests of our members (in receiving deliveries)
To assist with administration and security of College punts	(a) Identity (b) Contact (c) Education (d) Professional	Necessary for our legitimate interests (in providing access to College punts)
For pigeon hole management	(a) Identity	Necessary for our legitimate interests and those of our members (in operating a pigeon hole system to



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
		assist with the efficient delivery of post and similar items)
To consider applications for parking spaces and decide whether to grant spaces (including as part of reasonable adjustments)	(a) Identity (b) Contact (c) Welfare (d) Professional	(a) Necessary to comply with a legal obligation; (b) Necessary for our legitimate interests (to support staff with disabilities and who may have particular need of parking spaces)



## WEBSITE

If you are a user or administrator of our website, this section will be relevant to you.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To make available and maintain our website	(a) Identity (b) Contact (c) Technical	(a) Consent; (b) Necessary for our legitimate interests (to ensure the proper functioning of our site)
To administer and protect our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for provision of administration and IT services, network security and to prevent fraud); (b) Necessary to comply with a legal obligation



## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can manage your marketing preferences or opt out of marketing at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside of St John's College for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of services provided to you or other use of or access to our facilities or services.

### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information on how we use cookies please refer to our [cookies policy](#).

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data as detailed below for the purposes set out in the table in paragraph 4 above. For more information please refer to our [Data Sharing table](#).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.



## 6. INTERNATIONAL TRANSFERS

Some of the third parties listed in the [Data Sharing Table](#) are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Further information is available in the [Data Sharing Table](#), but please [contact us](#) if you have any queries or want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## 7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our individual [Records of Processing Activities](#) (ROPAs) which are available on the website.

In some circumstances you can ask us to delete your data: see [\[Request erasure\]](#) below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this



information indefinitely without further notice to you.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please [contact us](#).

### No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. GLOSSARY

### LAWFUL BASIS

**Legitimate Interest** means the interest of our organisation in conducting and managing our organisation to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can

*Last revised: January 2026*

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obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.



## POLICY HISTORY

<i>Date of GB approval</i>	<i>Brief summary of changes</i>	<i>Confirmation that linked documents have updated if necessary</i>	<i>College policy register updated</i>
MT 2023	Amalgamated all existing privacy notices into one document and updated where necessary	Confirmed	Yes (I Burke)
HT 2025	Policy reviewed, no changes	Confirmed	Yes (I Burke)
MT 2025	Updates to Inspire Digital Hub as new operating platform	Confirmed	Yes (I Burke)
HT 2026	Added screening of non-alumni under fundraising for major gifts	Confirmed	Yes (I Burke)