Your privacy is important to us.

This Privacy Notice explains the types of personal data we may collect about you when you interact with us. It also explains how we’ll store and handle and keep that data safe.

The following sections will answer any questions you have, but, if not, please do get in touch by post, telephone or email. Contact details are shown below.

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

The law on data protection sets out a number of different reasons or conditions for which an organisation may collect and process your personal data, including:

1. **Consent**

   In specific situations, we can collect and process your data with your consent. This might include when you tick a box to receive an email about ways you can support us or to receive information about the College or our facilities.

   When collecting your personal data, we’ll always make clear to you what data is necessary and for what purpose.

2. **Contractual obligations**

   In certain circumstances, we need your personal data to comply with our contractual obligations, for example, if you pay to attend the College as a guest. Or if you give a donation and agree to Gift Aid or if you set up a regular gift by Direct Debit.

3. **Legal compliance**

   If the law requires us to, we may need to collect and process your data, for example, we can pass on details of people involved in fraud or other criminal activity affecting St Peter’s College to law enforcement agencies.

4. **Legitimate interest**

   In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected when we pursue our aims and objectives as an organisation, and which does not materially impact your rights, freedom or interests.

   The College has a legitimate interest in maintaining a record of its activities as part of a long-established university with a strong identity and history.

5. **When we collect your data**

   When you visit our website, we may collect your IP Address, page visited, web browser, any search criteria entered, previous web page visited and other technical information. This information is used solely for web server monitoring and to deliver the best visitor experience. Additional data may be
collected in forms for specific functions. For your security, we use all appropriate organisational and technical security controls to safeguard your data.

When we interact with you we may also collect notes from our conversations with you, details of any complaints or comments you make. We might record your age or identity where the law requires this.

We may use technology such as cookies to help us deliver relevant and interesting content in our communications in the future. We may profile you to find out more about you, but in the least intrusive way. We may use information we collect to display the most interesting content to you on our website. We may use data we hold about your previous visits.

We'll only ask for and use your personal data collected for the purpose stated at the point at which it is collected. If we believe your data is no longer needed for this purpose we will not process your data further.

Your image may be recorded on CCTV when you visit our premises. Your car number plate may be recorded too.

6. Social Media

We may collect your social media username, if you interact with us through those channels, to help us respond to your comments, questions and feedback.

The data privacy law allows this as part of our legitimate interest in understanding our audience.

If and when you wish to change how we use your data, you'll find details below in our 'What are my rights' section.

7. What are my rights

You have the right of access to the personal information we may hold about you. This is free of charge and will be supplied to you within one month of your request.

You can object to our processing of your personal information for direct marketing purposes.

You have the right to ask that we stop any consent-based processing of your personal data after you withdraw your consent.

When you withdraw consent, or object and we do not have a legitimate interest to continue, or once the purpose for which we hold the data has ended, your information may be deleted from our records, archived or anonymised. We may, however, keep it if we have a legal obligation.

You have the right to challenge automated decisions we make about you. You may ask for these to be assessed by one of our staff.

You have the right to request a copy of any information about you that the College may hold at any time to check whether it is accurate. To ask for your information, please contact Data Protection Officer, St Peter's College, using the details below.

Whenever you have given us your consent to use your personal data you have the right to change your mind and stop future communications. You may also opt out in some cases of our processing of your data where we have a Legitimate Interest.
To protect the confidentiality of your information and the interests of the College, we will ask you to verify your identity before proceeding with any request for information. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to request such information.

You are free to opt out of hearing from us by any channels at any time.

We may send you relevant and personalised communications by post. We’ll do this on the basis of our Legitimate Interest but only after certain risk assessments have been undertaken.

You are free to opt out of hearing from us by post at any time.

Sometimes we are required to inform you about certain changes. For example, updates to this Privacy Notice and where we have a legal obligation such as a duty of care or safeguarding. These administrative messages will not include any fundraising or marketing content and do not require prior consent when sent by email. If we didn’t use your personal data for these purposes, we would be unable to comply with our legal obligations.

We may use your data to send you a survey and feedback requests to help improve the way we communicate. These messages will not include any fundraising requests or marketing and do not require prior consent when sent by email. We have a legitimate interest to do so as this helps improve our services and make them more relevant to you.

Of course, you are free to opt out of receiving any of these communications.

8. Data retention

Whenever we collect or process your personal data, we’ll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely, archived, put beyond use, or anonymised.

If you have not engaged with us for more than five years, you will be flagged as inactive and we’ll contact you to ask whether you want us to keep your data or not. Unless you reply to say ‘yes’, we will delete or anonymise the personal data. However, we assume that past and present members of the College will expect to continue receiving information.

9. Special category data

"Special categories" of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. We aim to collect and process special category data as little as possible. St Peter’s College will document all incidents of its processing of special category data in our Information Asset Register, and will be preparing a separate document itemising all of these, with reasons, having conducted assessment on each occasion.

The Special Categories of personal data consist of data revealing:

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

GDPR Privacy Notice
Document Owner: Data Controller
25 May 2018 (v_01)
They also consist of the processing of:

- genetic data;
- biometric data (e.g. fingerprints) for the purpose of uniquely identifying someone;
- data concerning health;
- data concerning someone’s sex life or sexual orientation.

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

- With your explicit written consent; or
- Where it is necessary in the substantial public interest, and further conditions are met;
- Where the processing is necessary for archiving purposes in the public interest, or for scientific or historical research purposes, or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law;
- Where there is a legal obligation.

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

10. When we collect your personal data:

These occasions will include, but are not limited to:

- When you are a student of St Peter’s College;
- When you apply to St Peter’s College or request information;
- When you are an alumnus/alumna or supporter of St Peter’s College;
- When you are a staff member of St Peter’s College;
- When you are employed by St Peter’s College as a contractor;
- When you visit St Peter’s College as a tourist, a researcher in the Library and Archive, as a guest at a conference, event or a continuing education student;
- When you are a tenant of St Peter’s College;
- When you communicate or engage with St Peter’s College by letter, email or other means, including social media;
- When your image or vehicle number plate is recorded on our CCTV system; and
- When you access or engage with our website.

11. Protecting your data outside the EEA

Occasionally we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA such the USA.

For example, this might be required when we store data in a Cloud Service.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA, and we will treat the information under the guiding principles of this Privacy Notice.
12. Stopping us from using your data in the future

There are several ways you can stop communications from St Peter’s College:

Click the ‘unsubscribe’ link in any email communication that we send you. We will then stop any further emails and will ‘Forget’ your information in line with your rights unless we have a legal obligation to keep it. You can also stop communications by contacting us using the information below. Remember some administrative communications for current members cannot be stopped.

13. How to complain about our processing of your data

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

You can call them on 0303 123 1113 or go online to www.ico.org.uk/concerns

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

If you would like to discuss any aspect of this policy or the way St Peter’s College processes your information please contact;

Tara Jay, The Data Protection Officer

By Post: Data Protection Officer, c/o The Bursar St Peter’s College, Oxford OX1 2DL

By Email: SPC Data Protection, dataprotection@spc.ox.ac.uk

By Telephone: +44 (0)1865 278900