

## **Brasenose College SCR Member Only Privacy Notice (v1.4)**

### **A summary of what this notice explains**

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

This notice explains what personal data Brasenose College (“us” or “we”) holds about applicants or members of Brasenose College Senior Common Room (SCR) (“you”), how we use it internally, how we share it, how long we keep it and what your legal rights are in relation to it.

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

The main instances where we process your personal data are based on your consent. This notice sets out the categories and purposes of data where your consent is needed.

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

- 1. current students**
- 2. Staff (which may be relevant if you are also employed by the College)**
- 3. alumni and donors (including what financial information we hold about our alumni and how we use it when considering fundraising initiatives)**
- 4. archives (which explains what data we hold in our archive)**
- 5. security, maintenance and health and safety (including how we use CCTV)**
- 6. website and cookies (including how we monitor use of our website)**
- 7. IT systems (including how we monitor internet usage)**

You can access these and past versions of our privacy notices at:

<https://www.bnc.ox.ac.uk/privacypolicies>

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

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

Data protection law requires Brasenose College, as data 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.

## **Brasenose College’s Contact Details**

If you need to contact us about your data, please contact:

The Data Protection Officer  
Brasenose College  
Radcliffe Square  
Oxford  
OX1 4AJ

[data.protection@bnc.ox.ac.uk](mailto:data.protection@bnc.ox.ac.uk).

## **What personal data we hold about you and how we use it**

We may hold and use a range of data about you at different stages of our relationship with you. We might receive this data from you; we might create it ourselves, or we might receive it from someone else (for example if someone provides us with a reference about you).

Categories of data that we collect, store and use include (but are not limited to):

- The contact details that you provide to us, including names, addresses and telephone numbers.
- Your application paperwork.
- Details of your qualifications and correspondence in relation to them.

- References received about you, as well as the names and contact details of referees.
- Requests for special arrangements and/or waiver of eligibility criteria, including our consideration and decisions in relation to the same.
- Communications with you regarding the outcomes of your application.
- Records of decisions, including relevant committee and panel reports.
- Details of any medical issues and/or disabilities that you have notified to us, including any consideration and decision on reasonable adjustments made as a result.
- Equality monitoring data.
- Dietary requirements.
- Your financial details, including bank and building society account numbers, sort codes, BACS IDs and similar data.
- Records regarding grievances, disciplinary proceedings or investigations prompted by, involving or relating to you.
- Computing and email information, including login information for our IT systems, IP address(es), equipment allocated to you and records of network access.

We have a downloadable, detailed table (ROPA – Records of Processing Activities) setting out the processing activities that we undertake, the source of the data, the reasons why we process it, how long we keep it and the lawful basis we rely on for both your personal and special category data. It can be found at <https://www.bnc.ox.ac.uk/privacypolicies>

### **The lawful basis on which we process your data**

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

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

- Where your consent has been given;
- Where necessary to comply with a legal obligation;
- Where it is necessary for the performance of a task in the public interest;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests.

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

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

The Special Categories of personal data consist of data revealing:

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

They also consist of the processing of:

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

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

- Where processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the College or you in connection with employment, social security or social protection; or
- With your explicit written consent; or
- Where it is necessary in the substantial public interest, in particular:
  - for the exercise of a function conferred on the College or anyone else by an enactment or rule of law; or
  - for equal opportunities monitoring;
- Where the processing is necessary for archiving purposes in the public interest, or for scientific or historical research purposes, or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law.

We have in place an appropriate data handling policy and other safeguards that are required by law to maintain when processing such data.

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

#### *Criminal convictions and allegations of criminal activity*

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

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

Details of the lawful bases we rely on for the processing of the categories of data that we hold in relation to current staff, office holders and senior members are set out in our Record of Processing Activity (ROPA) (<https://www.bnc.ox.ac.uk/privacypolicies>). Details of retention periods are also available here.

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

Most data that you provide to us is processed by us in order that we, and you, can comply with obligations imposed by law.

Your failure to provide such data may mean that you are unable to take up the relevant membership.

Other data that you give to us is provided on a wholly voluntary basis – you have a choice whether to do so. Examples include:

- Dietary information.
- Disability and health condition information, which you may choose to provide to us in order that we can take this information into account when considering whether to make a reasonable adjustment.

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

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

- Data that we generate about you when processing your membership application;
- Your previous educational establishments and/or employers if they provide references to us;

Our Record of Processing Activity (ROPA) indicates the sources of each of the various categories of data that we process. These can be found at <https://www.bnc.ox.ac.uk/privacypolicies>

### **How we share your data**

We do not, and will not, sell your data to third parties. We will only share it with third parties if we are allowed or required to do so by law.

Where information is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our Supplier Information Security policies, and are only permitted to process your personal data for specific purposes in accordance with our instructions. We do not allow our third party providers to use your personal data for their own purposes.

More information on the categories of recipients of your data is set out in a table called Brasenose Data Sharing found here <https://www.bnc.ox.ac.uk/privacypolicies>.

### **Sharing your data outside the UK / European Economic Area (EEA)**

An EU GDPR adequacy decision on UK GDPR means that personal data (except any data transferred specifically for UK immigration control) can flow between the UK & European Economic Area (EEA) without any additional measures. The law provides various safeguards where data is transferred outside of the UK and EEA.

When you are resident outside either the UK or an EEA country where there is no “adequacy decision” by the European Commission, and an alternative safeguard is not available, we may still transfer data to you which is necessary for your membership with us.

We will not transfer your data outside the UK or European Economic Area (EEA) without first notifying you of our intentions and of the safeguards that apply to your data.

### **Automated decision-making**

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

### **How long we keep your data**

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

The detailed record of processing activities (ROPA) explains how long we will keep your data. This can be found at <https://www.bnc.ox.ac.uk/privacypolicies>

Retention periods may increase because of legislative changes, e.g., an increase in limitation periods for legal claims would mean that College is required to retain certain categories of personal data for longer. Any such changes will be reflected in updated versions of our Record of Processing Activity.

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

### Your legal rights over your data

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

- The **right to request access** to a copy of your data, as well as to be informed of various information about how your data is being used;
- The **right to have any inaccuracies in your data corrected**, which may include the right to have any incomplete data completed;
- The **right to have your personal data erased** in certain circumstances;
- The **right to have the processing of your data suspended**, for example if you want us to establish the accuracy of the data we are processing.
- The right to receive a **copy of data you have provided to us**, and have that transmitted to another data controller (for example, another University or College).
- The **right to object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- The **right to object to the processing of your information** if we are relying on a “legitimate interest” for the processing or where the processing is necessary for the performance of a task carried out in the public interest. The lawful basis for any processing activity we carry out is set out in our detailed table of processing activities (ROPA) that can be found at this link: <https://www.bnc.ox.ac.uk/privacypolicies>.
- The **right to object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.
- Where the lawful basis for processing your data is **consent**, you have the **right to withdraw your consent at any time**. This will not affect the validity of any lawful processing of your data

up until the time when you withdrew your consent. You may withdraw your consent by contacting the College Data Protection Officer:

The Data Protection Officer  
Brasenose College  
Radcliffe Square  
Oxford  
OX1 4AJ  
[data.protection@bnc.ox.ac.uk](mailto:data.protection@bnc.ox.ac.uk).

If you wish to exercise any of your rights in relation to your data as processed by Brasenose College, please contact our Data Protection Officer at the address above. Some of your rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk/>). You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office at <https://ico.org.uk/concerns/> if you believe that your data has been processed unlawfully.

#### **Future changes to this privacy notice**

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

You can access past versions of our privacy notices here:

<https://www.bnc.ox.ac.uk/privacypolicies>

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