



This privacy notice applies to users of Keble College IT systems, email and telephones/mobile devices

This is one of several Privacy Notices published by Keble College, all of which are available [here](#), along with more information about what the notices explain, personal data, your rights and who you can contact about your data.

This notice applies to users of Keble College IT systems, email and telephones/mobile devices. It will apply to anyone allowed to use such systems, including our staff and students. There are separate privacy notices covering the other aspects of processing of staff, student and others' data, including users of the College website, which are available at <https://www.keble.ox.ac.uk/data-protection/>

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

In most cases the data you provide will be a necessary requirement of using the relevant system (for example, you will need a password to access Keble College IT systems). If you do not provide such data you will not be able to use the system, and depending on circumstances this may become a disciplinary matter that could lead to the termination of your contract with us whether you are an employee, or a student.

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:

- The University of Oxford, which operates a number of centralised systems for all Colleges and Departments providing data including Single Sign On and Remote Access usernames; University Card data; email addresses provided centrally.
- Information that we generate in the course of operating the College's IT systems such as network usage logs, or which we obtain from third party suppliers, for example telephone records.

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

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

The table includes detailed information about how and why we process various categories of data, and the related lawful basis. It includes monitoring that may occur of use of telephone and IT services, including, subject to certain safeguards, email content, internet use and/or telephone records for the purpose of ensuring that such services are not used for unlawful purposes, or otherwise breach Keble College or Oxford University's IT Acceptable Use policies. The lawful basis for such processing is that the College has a legitimate interest in maintaining the integrity of its systems, to investigate misuse and in taking action to prevent misuse recurring.

How we share your data

We will not sell your data to third parties. We will only share it with third parties if we are allowed or required to do so by law. This includes for example where we decide to report alleged criminal misconduct to the police.

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

More information on the categories of recipients of your data is set out in a table [here](#).

Sharing your data outside the European Union

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

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

Otherwise, we may transfer your data outside the European Union, but only for the purposes referred to in this notice and provided either:

- There is a decision of the European Commission that the level of protection of personal data in the recipient country is adequate; or
- Appropriate safeguards are in place to ensure that your data is treated in accordance with UK data protection law, for example through the use of standard contractual clauses; or
- There is an applicable derogation in law which permits the transfer in the absence of an adequacy decision or an appropriate safeguard.

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

The detailed table of processing activities explains how long we will keep your data.

If there are legal proceedings, a regulatory, disciplinary or criminal investigation, suspected criminal activity, or relevant requests under data protection or freedom of information legislation, it may be necessary for us to suspend the deletion of data until the proceedings, investigation or request have been fully disposed of.

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

Future changes to this privacy notice, and previous versions

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

You can access past versions of our privacy notices at <https://www.keble.ox.ac.uk/data-protection/>

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