



This privacy notice applies to individuals whose personal data is retained in Keble College’s Archives and Library Collections

You should note that:

1. *A separate notice applies to users of our website, which explains how we monitor usage of our website. You can find that notice [here](#).*

This privacy notice applies to anyone whose personal data is retained in the College archives and library collections. This group will include:

- 1) *Former students*
- 2) *Current and former staff and officers of Keble College*
- 3) *Individuals who have donated items to our archives and library collections*
- 4) *Enquirers, researchers who have accessed our archives and library collections, and those who have licensed material from the archives and library for use*
- 5) *Other third parties referred to in records held in the archive*

A summary of what this notice explains

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

This notice explains what personal data Keble College holds about 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, they explain the source of the data.

There are some instances where we process your personal data on the basis of your consent. This notice sets out the categories and purposes of data where your consent is needed.

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 Keble College (“us” or “we”), 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.

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 purposes.

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

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those legitimate interests;
- Where it is necessary to take steps at your request prior to entering a contract;
- Where necessary to comply with a legal obligation;
- Where it is necessary to perform the contract we have entered into with you;
- Where it is necessary for the performance of a task in the public interest.

We may also use your data, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests. In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent. Where you are aged under 18, we may ask your parent or guardian for their consent also.

How we apply further protection in the case of "Special Categories" of personal 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.

The Special Categories of personal data consist of data revealing:

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

They also consist of the processing of:

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

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

- 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 Keble 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 policy document and/or other safeguards which we are required by law to maintain when processing such data.

Less commonly, we may process this type of data 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 data 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.

Your legal rights over your data

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

- The **right to request access** to a copy of your data, as well as to be informed of various information about how your data is being used;
- The **right to have any inaccuracies in your data corrected**, which may include the right to have any incomplete data completed;
- The **right to have your personal data erased** in certain circumstances;
- The **right to have the processing of your data suspended**, for example if you want us to establish the accuracy of the data we are processing.
- The right to receive a **copy of data you have provided to us**, and have that transmitted to another data controller (for example, another University or College).
- The **right to object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- The **right to object to the processing of your information** if we are relying on a “legitimate interest” for the processing or where the processing is necessary for the performance of a task carried out in the public interest. The lawful basis for any particular processing activity we carry out is set out in the [relevant detailed table of processing activities for each class of data subject](#).
- The **right to object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.

- Where the lawful basis for processing your data is **consent**, you have the **right to withdraw your consent at any time**. When you tell us you wish to exercise your right, we will stop further processing of such data. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent. You may withdraw your consent by contacting **the College's [Data Protection Officer](#)**

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.

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

If you as researcher, or potential licensee, do not provide your data (such as your name and contact details), you may not be allowed to access the archive or library collections, or license material.

Other sources of your data

Apart from the data that you provide to us, the data we hold about you may have been obtained from our staff, students, the University of Oxford, donors to our archives or other third parties.

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

We have prepared detailed tables 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 (in addition to the lawful basis on which we originally collected the data).

The table includes detailed information about how and why we process various categories of data, and the related lawful basis including the legitimate interest that Keble College has in processing in its archives and library collections:

- Material collected by or donated to our archives and library collections.
- Contractual agreements concerning the supply of images.
- Details of visitors, enquirers and researchers.

Specific to the Archives

- Student files including dates of attendance, course of study and outcome of their studies, results of College examinations ("collections"), University examinations, and College and University assessments, awards, scholarships and prizes conferred, applications (e.g. UCAS forms and references), academic and disciplinary records. These files may include information about a former student's personal life including their health, family circumstances, ethnicity, sexuality, political opinions, religious or philosophical beliefs, criminal convictions or allegations, gender, background, family circumstances and/or financial circumstances. Keble College has a legitimate interest in processing such data for the purposes of research and its archive in the public interest. Keble College also considers that it is in the public interest to process special category and/or criminal convictions or allegations data for such purposes.
- Extracts from staff records consisting of employee name, dates of employment, role(s) and reason(s) for departure (including for example retirement, new employment or dismissal), staff photograph, records of references given. Every effort will be made to weed out and destroy, after the stipulated period, those records that are not directly pertinent to the employment record, especially those containing sensitive personal data. This includes all papers relating to disciplinary matters or grievances, except in circumstances considered to be in the legitimate interest of the college to retain them.
- Other administrative records of the Keble College, for example Governing Body and other committee records. Such records may include the personal data of College staff where they are mentioned in Governing Body minutes, for example.

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.

Archive Access

Our archives may be consulted by researchers, with our permission and subject to the following restrictions and safeguards:

- Requests to access records in the archives that contain data relating to living individuals will be judged on a case-by-case basis, and access may only be granted subject to the decision of the College. Any such decision may require researchers to agree to anonymise the data in

any publications or outputs. Any such decisions will be explained and documented and this documentation will be retained by the Archives, to demonstrate the College's legal compliance.

- Researchers must have the express permission of the College (judged on a case-by-case basis) to take copies of material containing data pertaining to living individuals. Any such decisions will be explained and documented and this documentation will be retained by the Archives, to demonstrate the College's legal compliance.
- Material which is likely to cause substantial damage or distress to a living individuals shall be closed to research.
- Researchers are required to sign a registration form agreeing to the regulations of the repository (including a statement that they understand that they may become data controllers, and have an obligation to act in accordance with the Data Protection Act 2018) and will need to bring proof of ID to access our historical collections.
- Depositors have the right to require that specific files or items within the deposited collections be subject to additional closure periods, or that permission must be sought from the depositor before such specific files or items are opened to researchers.
- If the date of death of an individual cannot be ascertained, the individual will be presumed to have a 100 year life span. If the age of an adult individual is not known, they will be regarded as being 16 years old at the date of record creation.
- All material (both physical and digital) is stored securely to prevent unpermitted access.

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.

Sharing your data outside the European Union

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

We may transfer your data outside the European Union, but only for the purposes of research 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

For details of how long we keep specific types of data please see the Records of Processing Activities [here](#). In many cases, as your data is being processed for the purposes of archiving and historical research, we will keep it until the data is no longer required for this purpose. In practice, this means your data is likely to be retained permanently. However, if you believe our processing this data will cause you substantial damage or substantial distress, please contact the College Data Protection Officer so that we may consider whether it is appropriate for us to continue processing it, and/or whether further safeguards may be applied to our processing of the 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, or to make Keble 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. We will notify you of the change by email.

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

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