



This privacy notice applies to individuals whose personal data is retained in Keble College's Archives

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.

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. 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
- 4) Enquirers, researchers who have accessed our archives, and those who have licensed material from the archives for use
- 5) Other third parties referred to in records held in the archive

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 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 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 (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:

- 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.
- Other material collected by or donated to our archive.

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.

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

- Requests to access records 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

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 www.keble.ox.ac.uk/about/governance/data-protection-policies/past-privacy-notices.

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