

Keble College GDPR ROPA - Alumni, Donors and Supporters - v1.3 (Sep 2019)

Category of personal data	Source of the data	Why we process it	How long we keep this data	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal Conviction Grounds	Criminal conviction grounds (further information)
Records pertaining to security and medical incidents	We generate this data about you	To monitor the attendance of people on College premises, events on college premises, and relevant incidents occurring, as part of the College's safety and security arrangements.	Security incident reports and similar records are retained for 6 years after the current academic year. If incidents are mentioned during Governing Body meetings, the minutes will be retained in the College archive in perpetuity.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We have a legitimate interest in monitoring the attendance of people on College premises, as part of the College's safety and security arrangements.	Substantial public interest under the UK Data Protection Act 2018	To the extent that special category data is recorded, this will be done under the substantial public interest as being required under an enactment or rule of law, or preventing or detecting unlawful acts.	The processing relates to personal data that you have manifestly made public The processing is necessary in connection with legal proceedings (including prospective legal proceedings) The processing is necessary for the purpose of obtaining legal advice The processing is otherwise necessary for establishing, exercising or defending legal rights The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018 The processing meets a condition in Part 3 of Schedule 1 to the Data Protection Act 2018	
Security records, including CCTV recordings and still images taken from recordings, records of who has accessed the CCTV images and recordings and the reason for accessing them; access control records and records of keys issued.	We generate this data about you	To monitor the attendance of people on College premises, events on college premises, and relevant incidents occurring, as part of the College's safety and security arrangements. We hold recordings of CCTV footage for a limited period for the purpose of providing safety and security on College property and to assist with the prevention and	Routine CCTV footage is retained for 31 days. CCTV footage used during an investigation into an internal incident, and associated correspondence, is retained for 6 years following the closure of the investigation. A log of access to CCTV footage is kept for 6 years. Access control and access logs are retained for six	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We have a legitimate interest in monitoring the attendance of people on College premises, as part of the College's safety and security arrangements.	Substantial public interest under the UK Data Protection Act 2018	To the extent that special category data is recorded, this will be done under the substantial public interest as being required under an enactment or rule of law, or preventing or detecting unlawful acts.	The processing relates to personal data that you have manifestly made public The processing is necessary in connection with legal proceedings (including prospective legal proceedings) The processing is necessary for the purpose of obtaining legal advice The processing is otherwise necessary for establishing,	

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		detection of crime or other unlawful activity. Where an incident is recorded we may need to capture images for the purposes of any investigation by the College or police.	months. Visitor Records - such as lodge diary sheets, visitor logs, and records relating to the allocation of keys and access cards will be retained for one year after their return.					exercising or defending legal rights The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018 The processing meets a condition in Part 3 of Schedule 1 to the Data Protection Act 2018
Information about your health, dietary requirements and/or disabilities.	We obtain this data from you	When we consider what reasonable adjustments to make, or we need to take account of any dietary requirements you have (whether for medical or belief reasons), when planning for you attendance at alumni events. In addition, we have an obligation to confirm that the College is following applicable policies (such as vulnerable person policies).	Permanently.	Consent	So that we can adhere to your wishes and requirements in the context of our alumni relations and fundraising policies		To the extent that special category data is included in the information stored, this will be data that the relevant alum has made public.	
Library records: details of your name, book donations you have made, and dates of donations are retained by the College library.	We generate this data about you	To recognise and record the contribution made by individuals to the College.	We retain details of such donations permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We, and you, have a legitimate interest in recording and recognising the contributions you have made to the College.			
Rights to use College facilities: library access and borrowing rights; dining rights; reduced rates for accommodation, etc.	We generate this data about you	To enable the College to recognise, and for you to exercise, your rights as a College alumnus. We also record instances where you have exercised your alumni rights as part of the proper operation of College library	Details to the rights you have as regards College facilities will be held permanently.	Processing is necessary for performance of our contract with you Processing is necessary for the purposes of our or someone else's legitimate interests, except where	We have a legitimate interest in the proper operation of College facilities. We, and you, have a legitimate interest in the accuracy of College records.			

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		facilities, dining facilities and accommodation		overridden by your data protection rights and freedoms					
Legacy documentation, including correspondence with future and prospective legators, copies of relevant wills or sections of wills.	We obtain this data from you We generate this data about you	As a record of amounts and documentation relating to future/proposed donations, to enable the efficient transfer of relevant funds at the appropriate time, and to enable the College to plan for the future. We also stored and use this information so that the College/University can accurately follow the wishes and intentions of alumni/supporters who indicate that they will be leaving a legacy. In addition, details of proposed legators will be used to thank legators during their lifetime.	Details of a legator's identity, the amount of any legacy, and the use to which it was put will be stored by the College and/or University in perpetuity. Where a legacy contains conditions, directions or is subject to a dispute, we will retain all information held pertaining to that legacy until (a) 15 years following the end of the dispute or any potential further disputes, or (b) until the assets forming the legacy are exhausted (whichever is longer).	Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in seeking legacy donations, holding a record of expected legacy donations, thanking legators and their families, and having materials available to demonstrate the College's interests in such funds.				
Graduation ceremony applications (excluding dietary information), related correspondence.	We obtain this data from you We generate this data about you	To enable you to attend your graduation.	We retain this data until [6 months] after your graduation ceremony has taken place.	Processing is necessary for performance of our contract with you Processing is necessary for the performance of a task carried out in the public interest Processing is necessary for the purposes of our or someone else's legitimate interests, except where	We have a legitimate interest in the retention of this data for a period following your graduation ceremony, as it may be relevant to respond to queries, or for administrative purposes.				

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				overridden by your data protection rights and freedoms				
<p>Development and Alumni Relations System (“DARS”) records. We may hold and process the following types of personal data about you:</p> <ul style="list-style-type: none"> - Biographical information - Details of our ongoing relationship and your engagement with us - Information about your giving - Information relating to your willingness or financial capacity to support our charitable objectives - Sensitive personal data, which may include: <ul style="list-style-type: none"> • Health information, including any medical conditions • criminal convictions, offences and allegations of criminal activity • race or ethnicity, religious beliefs, sexual orientation, political opinions 	<p>We obtain this data from the University of Oxford</p> <p>We obtain this data from you</p> <p>We generate this data about you</p> <p>Third party</p>		Permanently.	<p>Processing is necessary for performance of our contract with you</p> <p>Processing is necessary for compliance with a legal obligation</p> <p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p> <p>You have given your consent to the processing for one or more specific purposes</p>	<p>We have a legitimate interest in fundraising and alumni relations activities, including seeking donations in person, by telephone and via written communications. We also use the system to conduct statistical analysis of our activities and donor base, to make forecasts and predictions about philanthropic activity, gauge levels of support and ensure our messaging is timely and relevant. DARS is also used to identify alumni who may be appropriate guest speakers at events.</p> <p>DARS is also used to provide relevant correspondence to donors, to serve as tax receipts, and to ensure that the collegiate University's ethical framework and reputation is not compromised by the acceptance of any gifts. It also serves an event management purpose.</p>		<p>The categories and groupings of data collected and processed by the College using DARS, are split out in the other rows of this record. please refer to the rest of this table to identify the legal basis the College has for processing that type of data about you.</p>	<p>The categories and groupings of data collected and processed by the College using DARS, are split out in the other rows of this record. please refer to the rest of this table to identify the legal basis the College has for processing that type of data about you.</p>

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Contact Details: Email addresses and TPS Registered phone numbers	We obtain this data from the University of Oxford We obtain this data from you Third party	In order to be able to contact alumni and continue to develop the ongoing relationship between the College and its alumni. We continue to hold historic addresses to facilitate contact, as they often remain valid addresses for contact, and may represent additional properties used by an alumnus. They also assist in our checks on the accuracy of our records.	Permanently. (subject to Data Retention Policy to follow)	Legitimate Interests (for non Direct Marketing Purposes eg Surveys, Research, personal communications)	We, and you, have a legitimate interest in the College maintaining contact information in order to facilitate communication between us.				
Contact Details: Email addresses and TPS Registered phone numbers	We obtain this data from the University of Oxford We obtain this data from you Third party	In order to be able to contact alumni and continue to develop the ongoing relationship between the College and its alumni. We continue to hold historic addresses to facilitate contact, as they often remain valid addresses for contact, and may represent additional properties used by an alumnus. They also assist in our checks on the accuracy of our records.	Permanently. (subject to Data Retention Policy to follow)	Consent for Direct Marketing Purposes (eg Event, Fundraising, Publication)	We have your consent in order to receive communications promoting the work of the College via email or phone				
List of all members of College, organised by year of matriculation	We generate this data about you	To ensure guests claiming to be alumni are matriculated members, as part of the College's safety and security arrangements.	Permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We have a legitimate interest in monitoring the attendance of people on College premises, as part of the College's safety and security arrangements.				

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<p>Contact details (name, current and historic addresses, non TPS registered telephone numbers, email address where available), as amended from time to time.</p>	<p>We obtain this data from the University of Oxford We obtain this data from you Third party</p>	<p>In order to be able to contact alumni and continue to develop the ongoing relationship between the College and its alumni. We continue to hold historic addresses to facilitate contact, as they often remain valid addresses for contact, and may represent additional properties used by an alumnus. They also assist in our checks on the accuracy of our records.</p>	<p>Permanently.</p>	<p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p>	<p>We, and you, have a legitimate interest in the College maintaining contact information in order to facilitate communication between us.</p>				
<p>Subjects you studied and the type(s) of degree awarded (though not your results).</p>	<p>We obtain this data from the University of Oxford We obtain this data from you We generate this data about you</p>	<p>For the purposes of ensuring that we invite alumni back to relevant reunion events or to events they might be interested in, and to keep them up to date with news from their department(s).</p>	<p>Permanently.</p>	<p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p>	<p>We, and you, have a legitimate interest in contacting you regarding relevant events and news.</p>				
<p>Public awards, honours and academic prizes received by Alumni.</p>	<p>We obtain this data from you Third party</p>	<p>We retain a record of prestigious awards and honours received by our alumni, to recognise the achievements of our alumni body, and to facilitate interactions and communications between ourselves and the relevant individuals.</p>	<p>Permanently.</p>	<p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p>	<p>We, and you, have a legitimate interest in acting to deepen our relationships with alumni. We also have a legitimate interest in recognising the achievements of alumni, both within our records and at a public level.</p>	<p>Processing relates to personal data which you have manifestly made public</p>	<p>To the extent that special category data is relevant, we only collect and process that data in this context if it were available from the public sources announcing the award/honour, where you chose to provide the information to us and (where relevant) consented to our publication of the same.</p>		

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<p>Records generated for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom of information legislation, records made to comply with safeguarding, health and safety or counter-terrorism legislation, in connection with legal advice or claims, or to comply with auditors' requirements.</p>	<p>We obtain this data from the University of Oxford We obtain this data from you We generate this data about you Third party</p>	<p>So that we have a record of information supplied, both in the interests of good administration and also to meet legal and regulatory requirements.</p>	<p>For subject access requests the College will keep a record of the SAR output for a period of two years following the provision of the data to the data subject.</p>	<p>Processing is necessary for compliance with a legal obligation</p>		<p>Substantial public interest under the UK Data Protection Act 2018</p>	<p>Where it processes special category data for these purposes, the College is exercising functions conferred under legislation. The processing is necessary for reasons of substantial public interest, namely the requirement for the College to comply with its statutory and legal obligations.</p>	<p>The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018</p>	<p>Where it processes special category data for these purposes, the College is exercising functions conferred under legislation. The processing is necessary for reasons of substantial public interest, namely the requirement for the College to comply with its statutory and legal obligations.</p>
<p>Photographs of individual alumni, donors, or supporters, or a group of such identifiable individuals in a private setting, that appear in marketing and outreach materials.</p>	<p>We obtain this data from you</p>	<p>To promote the College to potential applicants, donors, and supporters.</p>	<p>Permanently. Such information may be transferred to College archives for purposes in the public interest, or for historical research purposes as a record of College life.</p>	<p>You have given your consent to the processing for one or more specific purposes</p>					
<p>Records of your attendance at College and University events, and other involvement in College life, whilst an alumni: group photographs at public events, written records of groups, societies, teams, sports events and outcomes.</p>	<p>We obtain this data from the University of Oxford We generate this data about you Third party</p>	<p>To maintain a record of College life, which may be relevant to you individually and which is also part of the College's own record of what members have achieved over time. To promote the College to potential applicants, donors, and supporters.</p>	<p>Permanently.</p>	<p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p>	<p>The College has a legitimate interest in maintaining a record of its cultural life.</p>	<p>Processing relates to personal data which you have manifestly made public</p>	<p>To the extent that special category data is included in the information stored, this will be data that the relevant alum has made public.</p>		

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<p>Biographical (non sensitive)information, including your interests, family news, educational history and achievements, employment history and current role details, and wealth information.</p>	<p>We obtain this data from the University of Oxford We obtain this data from you We generate this data about you Third party</p>	<p>To understand your interests, circumstances and occupation, in order to deepen our ongoing relationship with you. Alumni often provide us information specifically for the College record or as news, which we will also record on our alumni database. We may also be required by law, in certain specific circumstances, to process this information.</p>	<p>Permanently.</p>	<p>Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p>	<p>We have a legitimate interest in pursuing a positive long term relationship with our alumni.</p>	<p>N/A see A8 re personal sensitive data</p>	<p>We avoid storing any special category data on a record relating to religious beliefs, political persuasion. However, it is possible that there might be information attached to an alum's record, in a note, in some correspondence from the alum themselves, etc that could provide an indication of such beliefs (e.g. letter from Reverend on headed paper from Church).</p>	<p>The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018</p>	<p>Further processing activity carried out by Keble which relates to criminal offences or allegations involving donors and supporters including prospective donors and supporters (for example, in relation to money laundering or bribery offences) may also be carried out for the purposes of:</p> <ol style="list-style-type: none"> 1. complying with, or assisting other persons to comply with, a regulatory requirement which involves Keble taking steps to establish whether another person has: <ol style="list-style-type: none"> a. committed an unlawful act, or: b. been involved in dishonesty, malpractice or other seriously improper conduct; and 2. In the circumstances, Keble cannot reasonably be expected to obtain your consent to the processing, and the processing is necessary for reasons of substantial public interest.
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<p>Donation histories, including contacts made, details of amounts given and pledged, projects supported, Gift Aid forms (including name, address and other details).</p>	<p>We obtain this data from you We generate this data about you</p>	<p>To record the source of monies received, wishes of donors, and to hold an accurate record of the support donors have provided to the College. We may also need to provide some details to HMRC in compliance with legal obligations. We also recognise our donors for the full spectrum of support they provide and seek to keep them updated about the projects they have supported, if they so wish.</p>	<p>We keep a skeleton record, including details of any expressions of wish, in perpetuity. Data is held in the department for as long as the donation is active. After 7 years, if the donation is no longer active, the data is offered to the Archive. Additional transaction information is held for 7 years post donation.</p>	<p>Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p>	<p>We have a legitimate interest in holding records of the support you have provided to the College. You have a legitimate interest in our recording and recognising that support.</p>				
<p>Correspondence with you</p>	<p>We obtain this data from you</p>	<p>To hold an accurate record of our communications with you to ensure we can maintain continuity in our lifelong relationship with our alumni.</p>	<p>Permanently.</p>	<p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p>	<p>We, and you, have a legitimate interests in the College holding a full record of our correspondence with you, which can be referred back to over the course of our relationship.</p>				
<p>Opinions and comments made by you on College development and outreach programs and events, as expressed in communications with the College (to the extent recorded)</p>	<p>We obtain this data from you</p>	<p>The views, ideas and concerns of alumni help to guide College development activities. Such comments would only be recorded in relation to a specific alumnus where we have been clear that the relevant survey is not anonymous, or where the relevant opinions were expressed in correspondence which is retained. The College uses alumni comments to evaluate the success of events, activities,</p>	<p>Permanently.</p>	<p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p>	<p>We have a legitimate interest in operating a proactive, positive and engaged development program.</p>				

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		and to shape future strategy.							
Financial information including your contact information and details of invoicing and outstanding payments (including payment information such as credit card or banking payment information) for: accommodation, deposits, food and drink, use of sporting and other facilities, as we have arranged with you including alumni and friends event booking	We obtain this data from you We generate this data about you	To take and/or pursue outstanding sums due to the College.	Payment and invoicing data will be retained for [7 years] following date of payment. Data may be retained for a longer period in the event of a dispute. Card details only for the duration of the transaction itself. Details destroyed thereafter.	Processing is necessary for performance of our contract with you Processing is necessary for the performance of a task carried out in the public interest	PCI (Payment Card Industry) Compliance Rules apply for processing payment by card.				
Records of College cultural life while you attended the University: photographs and written records of teams, choirs, clubs and societies, alumni societies, plays and performances, of participation in events and sporting fixtures and of the outcomes.	We obtain this data from the University of Oxford We obtain this data from you We generate this data about you Third party	To maintain a record of College life, which may be relevant to you individually (for example if you later request a reference from us), and which is also part of the College's own record of what its members have achieved over time. We also add the facts of your memberships/interests, activities and achievements onto our database, to ensure we offer a personalised experience in our relationship with you.	Permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining a record of its cultural life. We, and you also have a legitimate interest in ensuring that we have a positive and well-informed ongoing relationship.	Processing relates to personal data which you have manifestly made public	To the extent that special category data is retained, this will be data that you have made public via your membership of relevant societies, attendance at and participation in events.		

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<p>Details of prizes, scholarships, bursaries, including details of the recipients and donors.</p>	<p>We obtain this data from the University of Oxford We obtain this data from you We generate this data about you Third party</p>	<p>We record prizes, scholarships, and bursaries awarded, including details of the recipients and donors. In addition to keeping a record of monies received and distributed, we are required to provide appropriate updates to donors regarding the use of their donations, and we facilitate communications between communities of scholars, and between donors and recipients. We also retain the information as part of the ongoing deep relationship and communications between the College and individual alumni.</p>	<p>Permanently.</p>	<p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms</p>	<p>We have a legitimate interest in recording and retaining data on monies received and distributed. We, our alumni, and other donors, have a legitimate interest in our holding information pertinent to the ongoing deep relationship and communications between us. Donors also have a legitimate interest in understanding the use(s) to which their contributions are put.</p>				
<p>Accident reports records containing information about the date and nature of the accident, who was involved, their home address, who witnessed it and any steps taken concerning it. Health and safety records.</p>	<p>We generate this data about you</p>	<p>So that we have a record of accidents occurring on College premises. In some cases the College also has a legal obligation to record and report accidents to the relevant regulatory authority.</p>	<p>40 years after last entry</p>	<p>Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms; The processing is necessary for compliance with a legal obligation.</p>	<p>The College has a legitimate interest in creating and retaining records of accidents on College premises to assist with its management of health and safety risks. In some cases the College is obliged to record and report accidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.</p>	<p>Substantial public interest under the UK Data Protection Act 2018</p>	<p>The processing is necessary for the protection of members of the public from any potential health and safety risks, and must be carried out without the consent of the individual so as not to prejudice such protection. Processing to record and report relevant accidents is (where a legal obligation is imposed on the College) in the substantial public interest and pursuant to the exercise of a</p>		

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							function conferred on a person by an enactment.		
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