

Keble College GDPR ROPA - Conferences, Events, Bed & Breakfast, and Visitors - v1.7 (Feb 2023)

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)
Contact details (name, current addresses, telephone contact details), to the extent collected, of event attendees, speakers, performers and event/conference organisers.	We obtain this data from you.  We obtain data from third parties e.g. where someone is organising an event that involves you as a speaker.	In order to communicate with you about events and conferences you are attending, have expressed an interest in or may have an interest in.	Details for conference and event organisers and attendees are held for 6 years post event. Files of significant events and conferences may be retained in the College archives in perpetuity. Details of Bed and Breakfast guests are kept for one year following their visit. If you are also an alumnus, the fact of your attendance or involvement at a conference or event may be noted in your alum record (please refer to the record of processing activity relating to alumni, and relevant privacy notice, for further details as to what we hold for alumni). If you have requested addition to our communications lists, in order to be notified of future events and opportunities, we will continue to hold your contact details until you tell us you no longer wish to be contacted or time has passed such that we are no longer certain that you wish to continue to receive messages and we are unable to obtain renewed confirmation from you that you do.	Processing is necessary for performance of our contract with you  Processing is necessary in order to take steps at your request prior to entering a contract  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	Where you have an expressed an interest in events and conferences, processing is necessary in order to enable us to enter into relevant contracts with you or take relevant preparatory steps. We also have a legitimate interest in processing your personal contact data for the purposes of marketing additional events to you, where appropriate and in line with other regulatory and legislative regimes.				

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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, car parking permit records and records of keys issued.	We generate this data about you	To monitor the attendance of people on College premises, 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 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.	Routine CCTV footage is retained for 30 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 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. Records of car parking permits are retained until the end of the current academic year.	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, you, and College residents have a legitimate interest in restricting access to College property to authorised persons, monitoring the attendance of people on College premises, and maintaining a record of incidents occurring on College property, as part of the College's safety and security arrangements.	Substantial public interest under the UK Data Protection Act 2018	The College processes special category information in pursuit of our functions and under health and safety legislation, and for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the College or the data subject in connection with employment, social security or social protection.	The processing is necessary for purposes of the prevention or detection of an unlawful act and must be carried out without the consent of the data subject, so as not to prejudice those purposes.	To the extent that data recorded includes data on criminal offences, convictions and allegations.
Records pertaining to security and medical incidents	We generate this data about you	To monitor the attendance of people on College premises, 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, you, and College residents have a legitimate interest in restricting access to College property to authorised persons, monitoring the attendance of people on College premises, and maintaining a record of incidents occurring on College property, as part of the College's safety and security arrangements.	Substantial public interest under the UK Data Protection Act 2018	The College processes special category information in pursuit of our functions and under health and safety legislation, and for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the College or the data subject in connection with employment, social	The processing is necessary for purposes of the prevention or detection of an unlawful act and must be carried out without the consent of the data subject, so as not to prejudice those purposes.	To the extent that data recorded includes data on criminal offences, convictions and allegations.

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							security or social protection.		
Records of College events and conferences in which you have expressed an interest, or for which you have registered for and/or attended.	We generate this data about you	To enable the proper management of College events, to ensure that we have an accurate record of attendance at College events and to enable us (where permitted) to inform you of additional events which may be of interest to you. Also, to inform the planning of future events.	We retain details of events that you have attended and details of conference and events that you organise for 6 years post event. Files of significant events and conferences may be retained in the College archives in perpetuity. If you are also an alumnus, the fact of your attendance or involvement may be noted in your alum record (please refer to the record of processing activity relating to alumni, and relevant privacy notice, for further details as to what we hold for alumni). If you have requested addition to our communications lists, in order to be notified of future events and opportunities, we will continue to hold your contact details until you tell us you no longer wish to be contacted or time has passed such that we are no longer certain that you wish to continue to receive messages and we are unable to obtain	Processing is necessary for performance of our contract with you  Processing is necessary in order to take steps at your request prior to entering a contract  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	To the extent that you attendance is based on a contractual relationship, processing is necessary for the performance of that contract or as part of preparatory steps prior to entering into that contract. For other events, we have a legitimate interest in understanding who will be attending College events for organisational, Health and Safety and similar purposes.  Further, we have a legitimate interest in all cases in recording this information, in order to assess the popularity and impact of College events, plan future events and make details of planned events available to parties likely to be interested in attending (where permitted by relevant regulatory and statutory regimes).				

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			renewed confirmation from you that you do.						
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, tourism, in connection with legal advice or claims, or to comply with auditors' requirements.	We generate this data about you	So that we have a record of information supplied, both in the interests of good administration and also to meet legal and regulatory requirements.	This data will be retained for a period of 7 years from the date the record was generated. Guest registration cards are retained for 12 months.	Processing is necessary for compliance with a legal obligation		Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is complying with its obligations 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.	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018	Where it processes criminal convictions/allegations data for these purposes, the College is complying with its obligations 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.
Opinions and comments made by you on College events, as expressed in communications with the College (to the extent recorded).	We obtain this data from you	The views and concerns of attendees at our events help to guide the planning of future activities.	Feedback provided by an identifiable individual following a conference or event is retained as part of the conference file for 6 years after the end of the current financial year. Feedback provided via the Criton app will be anonymised one month after receipt. Anonymised feedback, used for analysis, will be retained for 3 years after the end of the current financial year.	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 proactively managing our events programme.				

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Financial information including bank/building society account numbers, sort codes, credit/debit card numbers, invoices and outstanding payment information.	We obtain this data from you	As part of taking payments (including deposits and balances) for events, providing invoices and pursuing outstanding amounts.	For 6 years following the end of the financial year in which the invoice is generated. To the extent that payments remain outstanding, retention of the data may be extended to enable recover proceedings to take place.	Processing is necessary for performance of our contract with you.  Processing is necessary in order to take steps at your request prior to entering a contract					
Correspondence with you.	We obtain this data from you	To hold an accurate record of our communications with you.	Correspondence pertaining to enquiries that do not lead to a booking will be kept for 1 year. Other correspondence will ordinarily be held for its useful life, and the majority will be deleted within 6 years of receipt. However, where the content of communications continues to inform College activity, copies may be kept longer. In addition, correspondence referenced in Governing Body minutes will be added to 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, and you, have a legitimate interests in the College holding a full record of our correspondence with you, which can be referred back to as required.				
Group photographs taken during "public" events and conferences.	We generate this data about you	To maintain a record of College events, including entry of materials into the College archive. Images are also used to advertise activities within the College, both internally and externally.	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.	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 College life, and in marketing College facilities and opportunities.				

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Photographs of individuals attending events or conferences, or a group of such identifiable individuals in a private setting, that appears in marketing and outreach materials.	We generate this data about you	To maintain a record of College events, including entry of materials into the College archive. Images are also used to advertise activities within the College, both internally and externally.	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.	You have given your consent to the processing for one or more specific purposes					
Conference room bookings (overnight guests) and bed and breakfast, including names, contact details, ages, and disability details.	We obtain this data from you We generate this data about you	As part of the administration and management of College property.	The majority of data is retained for the current financial year + 6 years. Special category data, such as disability details is deleted within one month of the event occurring.	Processing is necessary for performance of our contract with you  Processing is necessary in order to take steps at your request prior to entering a contract  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 the proper management of College facilities, in maintaining the security of College premises, in understanding the purposes for which facilities have been reserved, and in recording the identities of those booking College facilities.	Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is complying with obligations under the Equality Act 2010 and/or pursuant to health and safety legislation. The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning equal opportunity and to make reasonable adjustments, and to comply with its health and safety obligations.		
Meal bookings.	We generate this data about you	So that we may provide catering services to guest in accordance with relevant entitlements, and invoice correctly for services provided.	General information on conference and event attendees is retained for the for current financial year + 6 years. Special category data, such as medical information and disability details are deleted within two months of the event occurring.	Processing is necessary for performance of our contract with you					



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Records of requests and bookings for conferences and events, including records of any decisions the College makes pursuant to its obligation to take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, students and employees of the College and for visiting speakers.	We obtain this data from you  We generate this data about you Third party	As part of the management of event bookings and to comply with our legal obligations.	The majority of records that relate to requests that do not result in a conference or event will be retained for 1 year following the enquiry. Records pertaining to events that do occur will be retained for 6 years following the end of the applicable financial year. Files of significant events and conferences may be retained in the College archives in perpetuity.	Processing is necessary for compliance with a legal obligation		Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is exercising functions conferred under the Education (No 2) Act 1986. The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning freedom of speech within the law.	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018	Where it processes criminal conviction/allegation data for these purposes, the College is exercising functions conferred under the Education (No 2) Act 1986. The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning freedom of speech within the law
Correspondence with school teachers, liaison staff, and external partners pertaining to open days, school visits (in-bound and outbound), and access and outreach events with external partners	We obtain this data from you	In order to organise and facilitate access and outreach activities	Most records are kept for three years after the end of the relevant academic year. Accommodation correspondence, allocation, and documentation are retaining for one year after the end of the current financial year.	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 overridden by your data protection rights and freedoms.	The College has a legitimate interest in processing this data so that it may recruit from the widest range of backgrounds.				
Feedback received pertaining to open days, school visits (in-bound and outbound), and access and outreach events with external partners	We obtain this data from you	In order to improve access and outreach activities	For one year after the end of the relevant academic year	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 processing this data so that it may improve the access and outreach activities in which it participates				
Organisational and administrative records pertaining to open days, school visits (in-bound and outbound), and access and outreach events with	We obtain this data from you  We generate this data about you	In order to organise and facilitate access and outreach activities	Most records are kept for three years after the end of the relevant academic year. Accommodation correspondence,	Processing is necessary for the performance of a task carried out in the public interest;  Processing is	The College has a legitimate interest in processing this data so that it may recruit from the widest range of backgrounds.				

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external partners. Includes names and contact details of organisers and visitors.	We obtain this data from third parties		allocation, and documentation are retaining for one year after the end of the current financial year.	necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.					
Computer and email information, including guest login, username and password information for College IT systems, IP addresses of devices you connect to College IT systems, details of when you connected or logged in to our network, and records of internet usage.	We generate this data about you	For the proper management of College IT resources.	Records of guest log-ons issued by the lodge will be destroyed after one year. Records forming part of conference files will be destroyed after six years.	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 overridden by your data protection rights and freedoms	We have a legitimate interest in the proper management of College IT resources.				
Details of parishes that form part of the College's Advowsons - including names, addresses and contact details for the incumbent Vicars	We obtain this data from you.  We obtain data from third parties, e.g. parish secretaries	In order to communicate with you regarding the parishes in which the College has an interest; in order to communicate with you about events and conferences you are attending	This data is retained until it is superseded. Historically significant information may be preserved in the College archives 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	The College has a legitimate interest in maintaining a record of its activities as a patron to parishes, with a strong identity and history, and in maintaining such records for future research.				
Files of those coming to College for work experience, including personal details/CVs and correspondence with the school and individual	We obtain this data from you We generate this data about you We obtain this information from a third party	In order to participate in work experience schemes with local schools and educational establishments	This data will be retained for one year from the end of the work experience placement.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms					
Accident reports records containing information about the date and nature of the accident, who was involved, their home address, who witnessed it and any	We generate this data about you	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	40 years after last entry	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights	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	Substantial public interest under the UK Data Protection Act 2018	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		



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steps taken concerning it. Health and safety records.		relevant regulatory authority.		and freedoms;  The processing is necessary for compliance with a legal obligation.	risks.  In some cases the College is obliged to record and report accidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.		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 function conferred on a person by an enactment.		
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 events.	General information on conference attendees is retained for the for current financial year + 6 years. Special category data, such as medical information and disability details is deleted within two months of the event occurring.	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	Processing is necessary for compliance with equality law, and/or food safety law. We also have a legitimate interest in ensuring that you receive an appropriate service and treatment in your interactions with us.	Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is complying with obligations under the Equality Act 2010 and/or pursuant to health and safety legislation. The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning equal opportunity and to make reasonable adjustments, and to comply with its health and safety obligations.		
Table plans and name cards	We generate this data about you  We obtain this data from you	To enable the efficient seating of diners at events	These records will be held for one year following the completion of the event	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your					

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				data protection rights and freedoms					
Chapel Office: information relating to individuals who have, or intend to be, married in the College chapel, including names, ages, occupations, marriage dates, and wedding preferences and plans.	We obtain this data from you	To make the College chapel available to current and former staff, students, office-holders, members and others for the purpose of wedding ceremonies.	Details of alumni ceremonies may be noted by the Alumni and Development Office and held permanently. A skeleton record of ceremonies is held by the College (details of main participants, type of event, dates and times). A register of marriages (which may be held by the Chapel or belong to the Parish Church – St Mary the Virgin) is held permanently. Conference and event paper files that contain Chapel booking forms are retained for the current financial year plus 6 years.	Processing is necessary for performance of our contract with you  Processing is necessary in order to take steps at your request prior to entering a contract  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 our recording sufficient data to enable your planned nuptials to proceed. We also have a legitimate interest in recording those details on the College Archive, as part of the record of College life.				
Chapel Registers of Services, Baptisms, and Confirmations - containing names, ages, dates	We obtain this data from you	To maintain a record of the services and ceremonies held in the College Chapel, and to make the Chapel available for the purpose of ceremonies.	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, and you, have a legitimate interest in our recording sufficient data to enable services and ceremonies to proceed. We also have a legitimate interest in recording those details on the College archives, as part of the record of College life.				

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Records generated to organise and publicise Chapel services, including orders of service, promotional material, correspondence and sermons preached. These records may contain the names and contact details of those participating in services, and those organising the services	We obtain this data from you  We generate this data about you	To organise and publicise Chapel services, and to maintain a record of sermons preached	These records will be retained for 1 year following the end of the applicable academic year. Records of historical significance may be transferred to the College archives and retained 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, and you , have a legitimate interest in our recording sufficient data to enable services to proceed, and to advertise those services. We also have a legitimate interest in recording those details on the College archives, as part of the record of College life.				
Chapel Visitors' Book - visitors record the date of their visit, their name, and comments about the Chapel	We obtain this data from you	To maintain a record of the visitors to the College chapel and their impressions of the building	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 maintaining a record, for posterity, of the visitors to the College chapel				
Chapel Officer rotas	We obtain this data from you  We generate this data about you	To ensure that Chapel services can proceed	These records will be retained for 1 year following the end of the applicable academic year	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 our recording sufficient data to enable services to proceed				
College security holds contact details for contractors working on College premises, and information about the contract they are working on.	We obtain this data from you	So that we may contact those working on College premises to discuss the work they are undertaking, or in an emergency.	Whilst work is ongoing or the need for further work involving you is anticipated.	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 and its contractors have a legitimate interest in being able to communicate about the work they are undertaking, or in an emergency.				