



EXETER  
COLLEGE  
OXFORD

## PRIVACY NOTICE – STAFF

### Protecting your privacy

#### 1. Introduction and purpose of this document

Exeter College is committed to protecting the privacy and security of personal data. This Privacy Notice explains the types of personal data we may collect about you when you interact with us. It also explains how we store and handle that data and keep it safe. This Privacy Notice does not constitute, or form part of, any contract between us. We hope that this document answers any questions you have but, if not, please do get in touch. Contact details are set out below.

The **main section** of this document covers the following information:

- Who we are, our aims and objectives;
- Key definitions, a summary of our legal obligations and contact details;
- Details regarding when and how we will collect your data, and the lawful bases we will rely on to process it;
- Our use of cookies;
- Your rights as a data subject; and
- Additional information about how we use your personal data including retention and sharing of your data and how to make a complaint.

It is likely that we will need to update this Privacy Notice from time to time, and you are welcome to come back and check this at any time or contact us by any of the means shown below.

Past versions of this Privacy Notice are available by request to the Data Protection Officer – [dataprotection@exeter.ox.ac.uk](mailto:dataprotection@exeter.ox.ac.uk)

#### 2. Who we are, our aims and objectives

Exeter College, founded in 1314, is the fourth-oldest constituent college in the University of Oxford. It is a registered charity and operates under a Royal Charter granted in 1565 by Queen Elizabeth I and through Statutes approved from time to time by Privy Council.

The College's charitable objects are:

*To maintain and support a College within the University of Oxford for the advancement of knowledge, education, research, learning and religion.*

In keeping with its own history and the history of the wider collegiate University, and in pursuit of its charitable objects, Exeter College is a society of professional academics (the fellows and tutors), students (both undergraduates and post-graduate) and non-academic employees (professional officers and staff), visiting academics and persons with academic interests or other connections with the College who are offered association with the Senior Common Room, and Emeritus Fellows and Honorary Fellows working, and often living, together within the College's campus.

The College provides domestic and pastoral services to its students in addition to teaching and education. The College maintains relations with former students, former fellows and many members of its staff long after they have left the College. The College also forms similar relationships with other individuals who do not have these prior associations but who, through encounters with the College, become affiliated as supporters and friends. It is through these diverse and enduring networks of associations that the College fulfils its academic objectives and these same networks constitute the core of the College's philanthropic supporter network.

As an academic institution, the College promotes the research and academic achievements of its fellows, tutors and other associates, both present and past, and it records and similarly promotes the achievements of its students and staff, including former students and employees who have achieved distinction in many different ways after leaving the College. Throughout its history, the College has maintained a record of its activities as a place of scholarship and of the people associated with it. These records form the College archive and are a valuable source of information for present and future research and scholarship. The archive will include records of present and past members, including undergraduates, graduates, fellows, scholars, alumni and other persons associated with the College.

### **3. Key definitions**

Exeter College is a data controller. This means that we are responsible for deciding how we hold and use personal data about you.

"Personal data" is information relating to you as a living, identifiable individual.

"Processing" your data includes various operations that may be carried out on your personal data, including collecting, recording, organising, using, disclosing, storing and deleting it.

The law requires us:

- To process your personal data in a lawful, fair and transparent way;
- To only collect your personal data for explicit and legitimate purposes;
- To only collect personal data that is relevant, and limited to the purpose(s) we have told you about;
- To ensure your personal data is accurate and up to date;
- To ensure that your personal 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.

#### 4. Contact us

The following sections will answer any questions you have but if not, please contact our Data Protection Officer at:

By Post Exeter College, Oxford OX1 3DP, United Kingdom

By Email [dataprotection@exeter.ox.ac.uk](mailto:dataprotection@exeter.ox.ac.uk)

By Telephone (44) 01865 279600

#### 5. How we collect your personal data

We collect many types of information about you. The information below is a summary of the types of data we will collect, our reasons for collecting this data, the lawful basis on which we will process this data and the period of time for which we will retain this data.

Full information about our processing of your data is set out in the attached Records of Processing Activities (ROPA) and we strongly recommend that you consult this.

For the avoidance of doubt, reference to 'staff' includes reference to employees, fellows, office holders, workers (including casual workers), independent contractors, agency workers and other applicable at the College. [In addition to those holding positions in the Chapel.]

The sorts of personal data we collect about you include:

- Recruitment records including your application, your right to work in the UK, our decisions about your application, Disclosure and Barring Service records, and equality monitoring data for equality and diversity monitoring purposes, disability details to enable us to make appropriate adjustments and bank details.
- Appointment details including role and contract details, to record the terms under which you are engaged.
- Employment records e.g. bank details, pension and benefits details, emergency contact details, information about disciplinary proceedings and grievances, absence and sickness records, development and promotion records, details of appraisals, references and end of employment records, in accordance with our duties as your employer; and
- Details of awards and achievements obtained externally from the College, received by staff prior to and during the course of their employment at the College.

#### 6. Sources of your personal data

Most data is generated by us or obtained from you. We may also obtain data from your referees or from the University of Oxford.

#### 7. The legal bases we rely on when processing your data

The UK GDPR sets out a number of different reasons or conditions for which an organisation may collect and process your personal data. When collecting your personal data, we will always make clear to you which data is necessary for each purpose.

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

## **Our contract with you**

The processing of your personal data by the College will frequently be necessary for the performance of our contract with you or prior to entering into a contract with you. This includes appointment details, pension and benefit scheme membership information, absence records and information about development and progression.

## **Legitimate interests**

In some cases, the College may need to process your data for the College's or someone else's legitimate interests, except where this is overridden by your data protection rights and freedoms. The College has a number of legitimate interests, for example in maintaining a record of its recruitment activities, recording key information about employment obligations, and enabling the correct calculation of benefits including pension contributions.

In some cases, the College may need to process your personal data to protect the legitimate interests of others, including you, as well as or instead of in its own interest. For example, the College and its staff have a legitimate interest in the proper investigation and handling of complaints, disputes and grievances.

## **Compliance with a legal obligation**

In some cases, the College must process your personal data in order to comply with a legal obligation. For example, the College must provide certain data to HMRC and comply with employment, equality and safeguarding law.

## **Performance of tasks in the public interest**

The College is entitled to process special category data in order to carry out its obligations in the field of employment and/or social security or protection and in line with legislation. The College has a substantial public interest in processing special category data and which is necessary, e.g. for equality law purposes. Such interests include preventing a breach of obligations under various laws including health and safety laws and to ensure compliance with the College's statutory and legal obligations.

## **Additional information including processing of data relating to criminal convictions**

The College will hold information about criminal convictions or allegations where incidents are alleged to have occurred on College property, or involved members of, or visitors to, the College. All such processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018.

## **8. Who we share your data with**

We will only share your data with third parties if we are allowed or required to do so by law. Examples of instances in which we will share your data are:

- where we are required to report information about staff and office holders that are subject to visa controls, to UK Visas and Immigration and/or the Home Office;
- where we are required to provide information to the UK Disclosure and Barring Service;

- where we are required to submit data for the Research Excellence Framework or similar assessment mechanisms; and • we provide real time information to HMRC in order to collect PAYE Income Tax and National Insurance contributions.
- specialist third parties such as medical professionals, external legal/HR advisors.

## 9. What are your rights over your personal data?

Subject to certain conditions and exceptions set out in UK GDPR, you have:

The **right to request access** a copy of your personal data, as well as to be informed of various information about how your personal 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 personal data** 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 our detailed table of processing activities, which we will provide on request;

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 personal 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 Exeter College’s Data Protection Officer using the contact details below.

Some of these rights are not automatic and we reserve the right to discuss the basis of your request with you before taking action.

Further guidance on your rights is available from the Information Commissioner’s Office (<https://ico.org.uk/>). You may also wish to contact Exeter College’s Data Protection Officer if you are considering how or whether to exercise your rights.

You have the right to complain to the UK’s supervisory office for data protection, the Information Commissioner’s Office if you believe that your data has been processed unlawfully.

## **10. Data retention**

Whenever we collect or process your personal data, we will only keep it for as long as is necessary for the purpose for which it was collected. The College's Records of Processing Activities (ROPAs) includes retention periods and will indicate the types of data which are archived for historical or statistical purposes. The ROPA can be viewed [here](#).

Retention periods may increase as a result of changes in legislation and in the circumstances of legal proceedings, it may be necessary to suspend the deletion of personal data. At the end of the retention period your data may be deleted completely, put beyond use or anonymised.

Where personal data is placed into the archives of the college, it will be kept in perpetuity. Such data includes that which reflects College life, or our history and heritage, and which is therefore archived by us in the public interest.

We may retain anonymised statistical data indefinitely to enable us to report on such matters as diversity and equality, or the incidents of complaints. Anonymous data is no longer personal data, and as such is not subject to data protection legislation requirements.

For your security, we use all appropriate organisational and technical security controls to safeguard your data.

### **Retention of your data**

The period for which we retain your data will depend on the specific type of data. Disclosure and Barring service data is only held for 6 months after the point at which we decide to appoint you to a position. Many types of information will be retained for seven years following the termination of your employment, after which a skeleton record only will be held. Other information may be retained indefinitely but only in an anonymised format.

## **11. Protecting your data outside the UK**

Occasionally we will need to share your personal data with third parties and suppliers outside the UK or the European Economic Area (EEA). The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

If we need to transfer personal data that we collect from you to data processors in countries that are outside the UK and the EEA we will ensure that there is an adequacy decision of the UK Government or the European Commission is in place, or appropriate data protection safeguards have been put in place, or it is otherwise lawful to transfer the personal data. For example, this might be required when we store data in a Cloud Service, or engage international firms to carry out data processing activities on our behalf.

## **12. The use of personal data for marketing purposes**

We will only send you electronic communications where we have your consent. In relation to other marketing activities, including postal and telephone communications, and analysis or profiling of contacts to ensure appropriate messages are provided, we have a legitimate interest in carrying out these activities and do so with appropriate consideration of and regard for your rights.

You are free to opt out of hearing from us at any time. You can stop communications from Exeter College as follows:

By clicking the 'unsubscribe' link in any email communication that we send you will stop further marketing communications. ; or

By contacting us using the information below.

### **13. Automated decision making**

The College does not carry out automated decision making.

### **14. Visitors to our website: our use of Cookies**

We use cookies on our website, which track your activity when you visit our website. We use the information gathered to improve our website and user experience. Cookies are small text files that are placed on your computer by the websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Cookies we use on the College website are:

<b>Cookie Name</b>	<b>Expiration Time</b>	<b>Description and purpose</b>
_ga	2 years	Google Analytics used to distinguish users
_gid	24 hours	Google Analytics used to distinguish users
_gat	1 minute	Google Analytics used to throttle request rate
PHPSESSID	end of session	Used for browser session management

These cookies are used to collect information about how visitors use our site. We only use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

If you would prefer to restrict, block or delete cookies from us, or indeed any other website, you can use your browser preferences to do so. If you wish to opt out of all Google Analytics tracking then you can do so, here: <https://tools.google.com/dlpage/gaoptout>

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see which cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **15. How to complain about our processing of your data**

If you feel that your personal data has been handled incorrectly, or you are unhappy with the way we have dealt with your query regarding the way we use your personal data, you have the right to complain to the Information Commissioner's Office (ICO) who is the supervisory body for data protection in the UK.

You can call them on 0303 123 1113 or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)

If you would like to discuss any aspect of this policy or the way Exeter College processes your personal data please contact:

The Data Protection Officer;

By Post Exeter College, Oxford OX1 3DP, United Kingdom

By Email [dataprotection@exeter.ox.ac.uk](mailto:dataprotection@exeter.ox.ac.uk)

By Telephone (44) 01865 279600

By College Order 25/076, this policy was approved by Governing Body on 18th June 2025, with immediate effect and is to be reviewed by 31/03/2026, and was also approved for display on the website.