

Exeter College GDPR - Alumni & Support ROPA - 28th November 2018

ID	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)
1	Details of prizes, scholarships, bursaries, including details of the recipients and donors.	We obtain this data from the University of Oxford. We obtain this data from you. We generate this data about you. Third party.	We record prizes, scholarships, and bursaries awarded, including details of the recipients and donors. In addition to keeping a record of funds received and disbursed, 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.	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 recording and retaining data on funds received and disbursed. 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 learning about the impact of their generosity and in understanding how we have used their donations.	N/A		N/A	
2	Contact details (name, current and historic addresses, telephone numbers), as amended from time to time.	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 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.	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 the College maintaining contact information in order to facilitate communication between us.	N/A		N/A	
3	Donor Strategy records.	We obtain this data from the University of Oxford. We obtain this data from you. We generate this data about you. Third party.	In addition to records held by the College, independently, the College also uses Donor Strategy to undertake the majority of development and alumni processes. This has a shared layer of data (contact information, education/interest data, fact of whether someone is a donor or not) which is available to all users. Users with specific roles (such as event managers and fundraisers) are able to see an extended range of data. As regards donations and connected details, the College can only see donations made to the College.	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 overridden by your data protection rights and freedoms. You have given your consent to the processing for one or more specific purposes.	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. Donor Strategy is also used to identify alumni who may be appropriate guest speakers at events. Donor Strategy 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.	N/A	The categories and groupings of data collected and processed by the College 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.	N/A	The categories and groupings of data collected and processed by the College 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.
4	Legacy documentation, including correspondence with confirmed 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 those who have indicated that they will support the College with a legacy in order that we can keep you informed of College priorities and developments. The data that we hold also relates to future/proposed donations, to enable the efficient transfer of relevant funds at the appropriate time. We also store 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 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.	N/A		N/A	
5	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 facilities.	Details to the rights you have as regards College facilities will be held in perpetuity. We retain records of your exercise of those rights/access to facilities for a period of [7 years] following the last instance.	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 operation of College library facilities. We, and you, have a legitimate interest in the accuracy of library records.	N/A		N/A	
6	Library records: details of your name, book donations you have made, and dates of donations are retained by the College library and recorded by the Development and Alumni Relations team.	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.	N/A		N/A	
7	Information about your health, dietary requirements and/or disabilities.	We obtain this data from you. We generate this data about 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 your attendance at alumni events. In addition, we have an obligation to confirm that the College is following applicable fundraising policies (such as vulnerable person policies). Further, if you request that we cease to contact you, we will record the reason you give (if any) for statistical purposes.	Permanently.	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 are also required (by law) to implement and check compliance with certain policies regarding our fundraising activities. We, and you, also have a legitimate interest in ensuring that you receive an appropriate service and treatment in your interactions with us, including in our ability to proactively offer you facilities designed to meet your needs.	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 Equality Act 2010 and/or pursuant to its obligations under 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.	N/A	

8	Security records, including CCTV records, access control records and records of keys issued. Records of security incidents, accident reports and health and safety records.	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.	CCTV records are retained for up to 50 days unless there is a justifiable legal reason to hold footage longer to assist with any investigation. Access, accident, health and safety, and similar records are retained for 7 years.	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.	
9	Records of College cultural life while you attended the University: photographs and written records of teams, choirs, clubs and 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.	N/A	
10	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, events, deposits, food and drink, use of sporting and other facilities, as we have arranged with you.	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.	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.	N/A	N/A	N/A	N/A	
11	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).	We obtain this data from you. We generate this data about you.	The views, ideas and concerns of alumni help to guide College development and alumni relations 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, and to shape future	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 operating a proactive, positive and engaged development and alumni relations programme.	N/A	N/A	N/A	
12	Correspondence with you.	We obtain this data from you. We generate this data about you.	To hold an accurate record of our communications with you to ensure we can maintain continuity in our lifelong relationship with our alumni.	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 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.	N/A	N/A	N/A	
13	Donation histories, including contacts made, details of amounts given and pledged, projects supported, Gift Aid forms (including name, address and other details).	We obtain this data from you. We generate this data about you.	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.	We keep a skeleton record, including details of any expressions of wish, in perpetuity. Additional transaction information is held for [7] years post donation.	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.	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.	N/A	N/A	N/A	
14	Biographical information, including your interests, family news, educational history and achievements, employment history and current role details, and wealth information.	We obtain this data from the University of Oxford. We obtain this data from you. We generate this data about you. Third party.	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.	Permanently.	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.	We have a legitimate interest in pursuing a positive long term relationship with our alumni.	Explicit consent.	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).	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018.	Further processing activity carried out by Exeter College 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: 1. complying with, or assisting other persons to comply with, a regulatory requirement which involves Exeter College taking steps to establish whether another person has: a. committed an unlawful act, or b. been involved in dishonesty, malpractice or other seriously improper conduct; and 2. In the circumstances, Exeter College cannot reasonably be expected to obtain your consent to the processing, and the processing is necessary for reasons of substantial public interest.
15	Records of your attendance at College and University events, and other involvement in College life, whilst an alumnus/a: photographs and written records of groups, societies, teams, sports events and outcomes.	We obtain this data from the University of Oxford. We generate this data about you. Third party.	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.	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.	Processing relates to personal data which you have manifestly made public.	To the extent that special category data is included in the information stored, this will be data that the relevant alumnus/a has made public.	N/A	
16	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.	We obtain this data from the University of Oxford. We obtain this data from you. We generate this data about you. Third party.	So that we have a record of information supplied, both in the interests of good administration and also to meet legal and regulatory requirements.	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.	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 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 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.	

17	Public awards, honours and academic prizes received by Alumni.	We obtain this data from you. Third party.	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 us and the relevant individuals.	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 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.	Processing relates to personal data which you have manifestly made public.	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.		
18	Subjects you studied and the type(s) of degree awarded (though not your results).	We obtain this data from the University of Oxford. We obtain this data from you. We generate this data about you. Third party.	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).	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 contacting you regarding relevant events and news.	N/A		N/A	