

Exeter College GDPR - Guest Accommodation ROPA - 28th November 2018

ID	Category of Personal Data	Source of the data	Why we process this data	How long we keep this data	Our lawful basis for processing	Details relating to lawful basis (where applicable)	special category grounds	special category grounds - details of public interest (where appropriate)	criminal conviction grounds	criminal conviction grounds (further information)
1	Guest Accommodation (name, current addresses, telephone contact details), to the extent collected, of guests/ department booking accommodation. This is to include records of guest bookings in which you have expressed an interest, or which you have booked.	We obtain this data from you. We obtain data from third parties e.g. where someone is booking accommodation on behalf of the guest.	In order to communicate with you about accommodation you booked, have expressed an interest in or may have an interest in.	For 6 years following the booking. In the event that disputes arise in relation to the booking, we may retain the data for a longer period, until a reasonable period after the dispute is resolved.	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.		N/A	
2	Security records, including CCTV records, access control records, guest vehicle registrations 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, as part of the College's safety and security arrangements.	CCTV records, access control and access logs are retained for three months. Security incidents, accident reports and health and safety records are retained for 6 years from creation. 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 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.
3	Information about your health, dietary requirements and/or disabilities.	We obtain this data from you. We obtain data from third parties e.g. where someone is booking accommodation on behalf of the guest.	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 visit.	Data is collated for use in relation to your visit and is retained for 6 years following the booking.	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.	N/A	
4	Opinions and comments made by you on accommodation, as expressed in communications with the College (to the extent recorded).	We obtain this data from you. We obtain data from third parties e.g. where someone is booking accommodation on behalf of the guest.	The views and concerns of guests help to guide future accommodation arrangements.	Comments regarding accommodation will be retained for 6 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 proactively managing our guest accommodation.	N/A			
5	Financial information to include invoices and outstanding payment information.	We obtain this data from you. We obtain data from third parties e.g. where someone is booking accommodation on behalf of the guest.	As part of taking payments for accommodation, providing invoices and pursuing outstanding amounts.	For 6 years from the point of invoice. 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.		N/A			
6	Correspondence with you.	We obtain this data from you. We obtain data from third parties e.g. where someone is booking	To hold an accurate record of our communications with you.	Correspondence will ordinarily be held for its useful life, and the majority will be deleted within 6 years of receipt.	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.	N/A			
7	Conference room bookings (overnight guests), including names, contact details, ages, and disability details.(Cohen Quad only).	We obtain this data from you. We generate this data about you.	As part of the administration and management of College property.	For 6 years following the booking. In the event that disputes arise in relation to the booking, we may retain the data for a longer period, until a reasonable period after the dispute is resolved.	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.		

8	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 will be destroyed after one year.	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.	N/A			
---	---	----------------------------------	--	---	--	---	-----	--	--	--