

Exeter College GDPR - Security 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) |
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| 1 | CCTV recordings and still images taken from recordings, records of who has accessed the CCTV images and recordings and the reason for accessing them. | We generate this data about you. | We hold recordings of CCTV footage for a limited period for the purpose of providing safety and security on campus and to assist with the prevention and detection of crime or other unlawful activity, including misconduct as an employee or student. Where an incident is recorded we may need to capture images for the purposes of any investigation by the College or police. | Up to 50 days unless there is a justifiable legal reason to hold footage longer to assist with any investigation. | 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 a legal obligation. | The College, its members and visitors have a legitimate interest in being in a safe and secure environment. Logs of who has accessed the recordings and their reason for accessing them are recorded to comply with the College's security and accountability obligations under data protection law. | | | 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. | |
| 2 | The College holds contact information for students, emergency contacts (e.g. parents of students) and staff and bedroom numbers for students. | We obtain this data from the University of Oxford. We obtain this data from you. We generate this data about you. | So that we can contact staff, students or their nominated emergency contacts in case of an emergency. | Whilst you are a registered student. | 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, its staff and students have a legitimate interest in being able to communicate with each other in case of an emergency. | | | | |
| 3 | Emergency medical information about students may be held by College security. | We obtain this data from you. | Where students inform us of a medical condition and/or disability that might be of assistance to us if they have a medical emergency. | Whilst you are a registered student. | Processing is necessary to protect your vital interests, or someone else's. 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 students have a legitimate interest in the College holding information which might help treat or prevent a medical emergency. | Processing is necessary to protect someone's vital interests where you are incapable of giving consent. | N/A | | |
| 4 | Informing emergency contacts about any medical emergency. | We obtain this data from you and/or others who have information about you, depending on the nature of the emergency. | | Whilst you are a registered student. | 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 students have a legitimate interest in emergency contacts being made aware in the event of a medical emergency. | Explicit consent. | | | |
| 5 | Security access records for staff, students and visitors (e.g. conference delegates, contractors). This includes your name, photograph and potentially any identity number (e.g. linked to your key swipe card or fob, including your university card number) and/or vehicle registration number. This information is also linked to our records of the timing of your access to any of our buildings or offices generated manually when you sign in with us and electronically by our key swipe card/fob system. We also hold records of the access rights that individual key holders have. | We generate this data about you. | We process this information to assist with security of College premises, so that we have records of who is on the premises in the event of a fire or similar emergency, to prevent unauthorised access to College premises and to assist with issuing replacement keys, cards and fobs. | 6 months after end of relationship with Exeter College. | 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, its members and visitors have a legitimate interest in implementing such measures to help maintain College safety and security. | Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms. | For security to ensure the card holder is the allocated user of the card. | | |
| 6 | 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. | | | | |

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| 7 | Accident records containing information about the date and nature of the accident, who was involved, who witnessed it and any steps taken concerning it. | 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 relevant regulatory authority. | Five years from the date of the accident. | 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. | 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. | 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 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. | | |
| 8 | Records of keys and access cards/fobs issued, including the name of the person to whom the key/fob has been issued and the identity number of the fob. | We obtain this data from the University of Oxford. We generate this data about you. | So that we have a record of who holds keys and access cards/fobs to support College security arrangements. | For as long as you hold the key/card/fob. | 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 the security of its premises. | | | | |
| 9 | Room bookings consisting of room, date/time, booking description and the identity of the person/society/organisation booking the room. Records of requests and bookings for rooms, 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. | As part of the system for providing College rooms and facilities to members of the College. | End of current term. | 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 a legal obligation (where freedom of speech issues are involved). | The College has a legitimate interest in making its rooms available to members of the College to enable events to be held. | 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 convictions/allegations of criminal activity 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. |
| 11 | Punt booking records consisting of the date and time of booking, the name and purpose of booking. | We obtain this data from you. We generate this data about you. | To assist with administration and security of College punts. | For six months. | 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 providing access to its punts. | | | | |
| 13 | Parking access request form containing the applicant's name. | We obtain this data from you. We generate this data about you. | So that we can consider applications for a parking space and decide whether to provide a space to applicants. | 6 weeks. | 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. | | | | | |
| 14 | Gym induction records. | We obtain this data from you. We generate this data about you. | So that we have a record of all authorised users of the gym. | End of relationship with Exeter. | 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. | It is in the College's legitimate interests to ensure the Health and Safety of the users of the gym to ensure they are adequately trained. | | | | |