

Exeter College GDPR - Student Accomodation 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)	criminal conviction grounds	criminal conviction grounds (further information)
1	Details of your accommodation tenancy or licence agreement, including the duration of your occupancy, payments you have made and decisions about accommodation applications and room allocation.	We generate this data about you.	In order to provide you with accommodation.	Records relating to accommodation tenancy or licence agreements will be retained for 6 years after the end of the academic year when your tenancy or licence ends.	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.	The College and its residents have a legitimate interest in the College providing accommodation and operating it efficiently and safely.				
2	Other records relating to your accommodation, for example your contact information, accommodation requests and preferences, booking forms for students and guests, records of any family members or dependants who occupy the accommodation, records of overnight guests, lost property records, rental of fridges, records of your accommodation inventory and of the condition/cleanliness of your accommodation throughout your occupancy.	We obtain this data from you. We generate this data about you.	In order to provide you with accommodation and related services and so that we have records for safety purposes of who is in College premises.	These records will be retained for six months after your tenancy or licence ends.	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.	The College and its residents have a legitimate interest in the College providing accommodation and operating it efficiently and safely.				
3	Records of requests and bookings for rooms and facilities for events held by students/student societies, 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 facilities to students and student societies.	Records will be retained for one year from the date on which a decision is made.	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 the performance of a task carried out in the public interest. Processing is necessary for compliance with a legal obligation.	The College has a legitimate interest in ensuring that such requests and bookings are considered pursuant to its procedures and in accordance with relevant legislation. The College has a legal obligation under the Education (No 2) Act 1986 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.	Substantial public interest under the UK Data Protection Act 2018.	Where the College processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations 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 is also necessary for the exercise of a protective function	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018.	Where the College processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations 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 is also necessary for the exercise of a protective function
4	Financial information including your contact information and details of invoicing and payment of "battels", namely: accommodation, as we have arranged with you.	We obtain this data from you. We generate this data about you.	In order to provide your course, accommodation and associated services.	Records of outstanding payments will be retained until they are paid in full. Records relating to invoicing and payment details will be retained for six years after the date on which you cease to be a registered student at the College, to comply with HMRC requirements.	Processing is necessary for performance of our contract with you.					
5	Emergency contact details.	We obtain this data from you.	So that we are able to contact people close to you in the event of an emergency.	For 6 years after the end of the academic year when you cease to be 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 the College being able to contact someone you nominate for emergency situations.				

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6	Mailing lists informing you about vacation residence, information about start/end of term, regular maintenance .	We generate this data about you.	To make students aware of College expectation.	Your email contact data will be removed from mailing lists within three months of the date on which you cease to be a registered student at the 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 and its students have a legitimate interest that students are notified of information about the College and University (for example, events).				
7	Landlord references we provide.	We generate this data about you.	Where we are asked to provide a reference for you.	Copies of references will be kept for six years from the date of provision of the reference. An entry noting that a reference was provided will be retained on your permanent record.	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 students and the recipients of references have a legitimate interest in providing and receiving references.				