

Exeter College GDPR - Tenants 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 applicable)	criminal conviction grounds	criminal conviction grounds (further information)
1	Tenants (name, current address, email address and telephone contact details), to the extent collected, of tenants.	We obtain this data from you.  We obtain data from third parties e.g. where someone is arranging the tenancy on behalf of you e.g Finders Keepers.	In order to communicate with you about property you are renting from us, have expressed an interest in or may have an interest in.	For 6 years following the end of your tenancy. In the event that a disputes arise in relation to the tenancy, 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 Property, in maintaining the security of College premises, and in recording the identities of those residing in College property.	N/A	N/A	N/A	N/A
2	Copies of passports, proof of address, visas and other immigration data.	We obtain this data from you.  We obtain data from third parties e.g. where someone is arranging the tenancy on behalf of you .	In order to assess your right to reside in the UK.	For 6 years following the end of your tenancy.	Processing is necessary for performance of our contract with you.  Processing is necessary for compliance with a legal obligation. Processing is necessary for the purpose of our or someone else's legitimate interests, expect where overridden by your data protection rights and freedoms.		Substantial public interest under the UK Data Protection Act 2018.	Where it processes special category data for these purposes, the College is complying with immigration related legal obligations placed on landlords, including the requirement to confirm a tenant's right to rent.	N/A	N/A
3	Details of your tenancy agreement with us including duration of tenancy, payments due under the agreement and any communications negotiating or discussing our tenancy agreement with you (to the extent recorded).	We generate this information about you.	In order to provide you with accomodation.	For 6 years following the end of your tenancy. In the event that a disputes arise in relation to the tenancy, 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 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 accomodation and operating it efficiently and safely.	N/A	N/A	N/A	N/A
4	Financial information including bank account number(s), sort code(s), BACS IDs, NI numbers, tax codes, payslips and similar data.	We obtain this data from you.	In order to ensure any payments due under the tenancy agreement can be processed and, where applicable, returned to you.	Records of outstanding payments will be retained until they are paid in full. Records relating to invoicing will be retained for <b>six months</b> after the date on which you cease to be a tenant.	Processing is necessary for the performance of our contract with you.		N/A	N/A	N/A	N/A

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5	Details of your relationship with the College, including details of any fellowship, position, role within the College and faculty, contract terms, salary, benefits and entitlements.	We obtain this data from you. We generate this data about you.	In order to assess your right to reside in the College Accommodation and ability to meet the rental charges. To maintain hisotric records of College employees for the archive, and in case we are approached for references.	Permanently.	Processing is necessary for the performance with 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 references. The College also has a legitimate interest in maintaing an accurate archive of College life.	The College has a legitimate interest in maintaining a record of its activities as part of a long established university with a strong identity and history, and in maintaining such records for future research. The College, its former employees and other parties have a legitimate interest in the College being able to provide references for former staff.	Processing is necessary for archiving in the public interest, and/ or for historical research purposes.	N/A	N/A
6	Residential status information including current address, previous address(es) and time at those addresses, alternative address (where relevant ), names of others you live with, previous residential status, previous landlord or letting agent and their contact details and previous rent or mortgage payments and mortgage provider (if applicable).	We obtain this data from you.	In order to assess your suitability to reside in College Property.	For 6 years following the end of your tenancy.	Processing is necessary for the performance with our contract with you.		N/A	N/A	N/A	N/A
7	Landlord references, if we are asked to provide a reference for you.	We generate this data about you.	When 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 our permanent record.	Processing is necessary for the purposes of our or someone else's legitimate interests, expect where overridden by your data protection rights and freedoms.	The College, Its staff and the recipients of references have a legitimate interest in providing and receiving references.	N/A	N/A	N/A	N/A
8	Details relating to your tenancy and how the property will be used, such as the number of type of pets you own, names and ages of your children.	We obtain this data from you.	In order to be aware who is residing in College Property.	For 6 years following the end of your tenancy.	Processing is necessary for the performance with our contract with you.		N/A	N/A	N/A	N/A
9	Details of any relevant unspent criminal convictions or criminal charges that we ask you to declare to us, either when you apply to us, or during your tenancy. Relevant criminal convictions or charges are those that indicate you might pose an unacceptable risk to other tenants, such that obtaining this information from you is in the public interest.	We obtain this data from you. We generate this data about you. We may obtain this data from third parties.	So that the College is a safe and secure environment.	Where criminal convictions, incidents or allegations are declared or reported to us, we will retain this data permanently.	Processing is necessary for the performance of our contract with you. Processing is necessary for the purposes of our or someone else's legitimate interests, expect 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.	N/A	N/A	All such processing meets a condition in Parts 1- 2 of Schedule 1 to the Data Protection Act 2018. The College has in place an appropriate policy document which meets the requirements of Schedule 1 paragraphs 38-41 of the DPA.	Processing is necessary for the purpose of preventing or detecting unlawful acts in accordance with Paragraph 10 of Part 2 of Schedule 1 to the Data Protection Act 2018. Alternatively, processing is necessary to protect members of the public against dishonesty or other seriously improper conduct.

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10	Details of any medical issues and/or disabilities that you have notified to us, including any consideration and decision on reasonable adjustments made as a result.	We obtain this data from you.	So that the College can consider what reasonable adjustments may need to be made.	For 6 years following the end of your tenancy.	Processing is necessary for compliance with a legal obligation. Processing is necessary for the purpose or our or someone else's legitimate interests, expect where overridden by your data protection rights and freedoms.	Processing is necessary for compliance with equality law. We also have a legitimate interest in ensuring that you receive an appropriate service and treatment in your interaction 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	N/A
11	Records regarding grievances, disciplinary proceedings or investigations prompted by, involving or relating to you which may impact on your suitability as a tenant of the College.	We obtain this data from you. We generate this data about you. We obtain this information from the University of Oxford.	In order to assess your suitability to reside in College Property.	This data will be retained for a period of 7 years from termination of your employment/association.	Processing is necessary for performance of our contract with you. Processing is necessary for compliance with a legal obligation. Processing is necessary for the purpose of our or someone else's legitimate interests, expect where overridden by your data protection rights and freedoms.	Processing of this data is necessary to comply with employment law. We, you, and other parties who are involved, also have a legitimate interest in the proper investigation and handling of relevant complaints, disputes and grievances.	Substantial public interest under the UK Data Protection Act 2018.	Where it processes special category data in relation to your personal characteristics, the College does so in pursuit of its compliance with health and safety, equality and employment legislation. It processes the data for the purposes of preventing an unlawful breach of such legislation and/or the exercise of functions pursuant to its legal obligations.	All such processing meets a condition in Parts 1- 2 of Schedule 1 to the Data Protection Act 2018. The College has in place an appropriate policy document which meets the requirements of Schedule 1 paragraphs 38-41 of the DPA.	Processing is necessary for the purpose of preventing or detecting unlawful acts in accordance with Paragraph 10 of Part 2 of Schedule 1 to the Data Protection Act 2018. Alternatively, processing is necessary to protect members of the public against dishonesty or other seriously improper conduct.