

## Privacy Notice: Applicants, offer holders and current students

This privacy notice applies to applicants, offer holders, and prospective or current students.

All Privacy Notices and Records of Processing Activities (ROPA) are published on the College website to show how the College keeps and processes personal data. (<https://www.st-hildas.ox.ac.uk/about-us/governance?tab=privacy-notices>)

### 1. A summary of what this notice explains

St Hilda's College is committed to protecting the privacy and security of personal data.

This notice explains what personal data St Hilda's College holds about you, how we use it internally, how we share it, how long we keep it and what your legal rights are in relation to it.

For the parts of your personal data that you supply to us, this notice also explains the basis on which you are required or requested to provide the information. For the parts of your personal data that we generate about you, or that we receive from others, it explains the source of the data.

There are some instances where we process your personal data on the basis of your consent. This notice sets out the categories and purposes we use your data for where your consent is needed.

### 2. What is your personal data and how does the law regulate our use of it?

"Personal data" is information relating to you as a living, identifiable individual. We refer to this as "your data". It can include information such as your name, contact details, education history and other information about you that we may process.

"Processing" your data includes various operations that may be carried out on your data, including collecting, recording, organising, using, disclosing, storing and deleting it.

Data protection law requires St Hilda's College ("us" or "we"), as data controller for your data:

- to process your data in a lawful, fair and transparent way
- to only collect your data for explicit and legitimate purposes
- to only collect data that is relevant, and limited to the purpose(s) we have told you about;
- to ensure that your data is accurate and up to date
- to ensure that your data is only kept as long as necessary for the purpose(s) we have told you about
- to ensure that appropriate security measures are used to protect your data

### 3. St Hilda's College's Contact Details

If you need to contact us about your data, please contact the Data Protection Officer, St Hilda's College, Cowley Place, Oxford OX4 1DY. Tel: 01865 276803. Email: [dpo@st-hildas.ox.ac.uk](mailto:dpo@st-hildas.ox.ac.uk).

### 4. What personal data we hold about you and how we use it

We may hold and use a range of data about you at different stages of our relationship with you. We might receive this data from you; we might create it ourselves, or we might receive it from someone else (for example if someone provides us with a reference about you).

Categories of data that we collect, store and use include (but are not limited to):

- Details required for the purpose of administering your application for study, including information that is taken into account for admissions interview and "contextual" data.

- Details required for your course enrolment and access to College or University facilities.
- Information that you voluntarily provide to us about any disabilities or health conditions you have, and about your age, ethnicity, gender, religion and belief, and/or sexual orientation. You may also provide this information to us as part of the equality monitoring that we undertake pursuant to our legal obligations under the Equality Act 2010.
- Where you inform us of a health condition or disability, we will take this information into account when considering whether to make a reasonable adjustment under equality law and in other cases where we are legally required to.
- Data about you that we have to collect by law (for example where UK immigration law requires us to record information about you, or to report it to the immigration authorities);
- Data that we voluntarily provide about you, either whilst you are a student or after you graduate, for example if you ask us for a reference.
- Bank and other payment details, where we need to reimburse you, or where you provide such details to us when making a payment.
- Information from CCTV and security access records, which may be held 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.
- Information generated in the course of operating College IT and telephone systems, which may be held 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.

Further, to comply with a legal obligation, namely St Hilda's College's obligation to ensure, so far as is reasonably practicable, that its staff, students and visitors are not exposed to health and safety risks, we will also process details of any relevant criminal convictions, allegations or charges that we ask you to declare to us when you apply to us, and of any Disclosure and Barring Service checks that we request. Relevant criminal convictions or charges are those that indicate an applicant or student might pose an unacceptable risk to other students or staff. The processing may also be necessary for the prevention or detection of unlawful acts. (Once the information has been provided to us, this processing must be carried out without your consent, as the law prohibits us from requiring your consent as a condition of performing a contract with you).

- More information is available for undergraduate admissions at: <https://www.ox.ac.uk/admissions/undergraduate/applying-to-oxford/decisions/criminal-convictions?wssl=1>
- And for graduate admissions at: <https://www.ox.ac.uk/admissions/graduate/applying-to-oxford/university-policies/criminal-convictions?wssl=1>

## 5. The lawful basis on which we process your data

The law requires that we provide you with information about the lawful basis on which we process your personal data, and for what purposes.

Most commonly, we will process your data on the following lawful grounds:

- where it is necessary to take steps (at your request) prior to entering a contract with you
- where it is necessary to perform the contract we have entered into with you
- where it is necessary to comply with a legal obligation
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

We may also use your data, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests. In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent. Where you are aged under 18, we may ask your parent or guardian for their consent also.

How we apply further protection in the case of "Special Categories" of personal data  
"Special categories" of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.

The Special Categories of personal data consist of data revealing:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership

They also consist of the processing of:

- genetic data
- biometric data (e.g. fingerprints) for the purpose of uniquely identifying someone
- data concerning health
- data concerning someone's sex life or sexual orientation

We may process special categories of personal data in the following circumstances:

- where processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on St Hilda's College or you in connection with employment, social security or social protection, *or*
- with your explicit written consent, *or*
- where it is necessary in the substantial public interest (and further conditions are met), in particular where:
  - for the exercise of a function conferred on St Hilda's College or anyone else by an enactment or rule of law, *or*
  - for equal opportunities monitoring
- where the processing is necessary for archiving purposes in the public interest, or for scientific or historical research purposes, or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law

We have in place records of processing activities (ROPA) and/or other safeguards which we are required by law to maintain when processing such data.

Less commonly, we may process this type of data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the data public.

#### Criminal convictions and allegations of criminal activity

Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. We may process such data on the same grounds as those identified for "special categories" referred to above.

Details of our processing activities, including our lawful basis for processing  
Details of the lawful bases we rely on for the processing of the categories of data that we hold in relation to applicants, offer holders and current students at St Hilda's College are set out in our Records of Processing Activity, available on the College [website](#).

## 6. Data that you provide to us and the possible consequences of you not providing it

In most cases, the data you provide to us will be a necessary requirement of your transaction with the College, and is processed by us in order that we, and you, can comply with obligations imposed by law. If you do not provide us with information that we ask for:

- If you are a *prospective student* wanting to attend an open day, it may mean that you cannot attend the open day, depending on the type of information we requested.
- If you are an *applicant* wanting to study with us, it may mean that we reject your application, depending on the type of information we requested.
- If you are an *offer holder or current student*, the provision of most data that you provide to us is a contractual requirement. If you do not provide us with information that you are contractually obliged to provide, the consequences will depend on the particular circumstances. In some cases, we may not be able to provide you with certain services; in other cases, this could result in disciplinary action or the termination of your contract.

## Other sources of your data

Apart from the data that you provide to us, we may also process data about you from a range of sources. These include:

- your school or previous educational establishments or employers, if they provide references to us
- your family members, guardians, friends, and other contacts who may provide us with information about you if and when they contact us, or vice versa
- data from your tutorials or in connection with your attendance, accommodation or use of facilities at St Hilda's College
- the University of Oxford, which operates a number of systems that Colleges have access to, including access your examination results, fees outstanding, degree ceremony bookings, emergency contact details, student loan status, "right to work" checks and visa information, disability information and reports by supervisors
- fellow students, family members, friends, visitors to St Hilda's College and other contacts who may provide us with information about you if and when they contact us, or vice versa.
- data from our IT or CCTV systems related to security processes

## 7. How we share your data

We will not sell your data to third parties. We will only share it with third parties if we are allowed or required to do so by law. This includes, for example:

- where we are required to report information about students that are subject to visa controls to UK Visas and Immigration
- where we are required to report information to the University of Oxford in order for it to fulfil its obligations to report information to the Higher Education Statistics Agency or its successor body in order to comply with regulatory obligations
- where we decide to report alleged criminal misconduct to the police

It also includes disclosures where the third party is an agent or service provider appointed by St Hilda's College to enable us to operate effectively, provided we are satisfied that appropriate safeguards have been put in place to ensure adequate levels of security for your data. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies, and are only permitted to process your personal data for specific purposes in accordance with our instructions. We do not allow our third-party providers to use your personal data for their own purposes.

#### Sharing your data outside the European Union

The law provides various further safeguards where data is transferred outside of the EU.

When you are resident outside the EU in a country where there is no "adequacy decision" by the European Commission, and an alternative safeguard is not available, we may still transfer data to you which is necessary for the implementation of pre-contractual measures, or for the performance of your contract with us.

Otherwise, we will not transfer your data outside the European Union without first notifying you of our intentions and of the safeguards that apply to your data.

#### 8. Automated decision-making

We do not envisage that any decisions will be taken about you based solely on automated means, however we will notify you in writing if this position changes.

#### 9. How long we keep your data

We retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements.

Details of expected retention periods for the different categories of your personal information that we hold are set out in our records of processing activities.

Please note that we may keep anonymised statistical data indefinitely, but you cannot be identified from such data.

#### 10. Your legal rights over your data

Subject to certain conditions set out in UK data protection law, you have:

- The **right to request access** to a copy of your data, as well as to be informed of various information about how your data is being used.
- The **right to have any inaccuracies in your data corrected**, which may include the right to have any incomplete data completed.
- The **right to have your personal data erased** in certain circumstances.
- The **right to have the processing of your data suspended**, for example if you want us to establish the accuracy of the data we are processing.
- The right to receive a **copy of data you have provided to us**, and have that transmitted to another data controller (for example, another University or College).
- The **right to object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- The **right to object to the processing of your information** if we are relying on a "legitimate interest" for the processing or where the processing is necessary for the performance of a task carried out in the public interest. The lawful basis for any particular processing activity we carry out is set out in our detailed table of processing activities (ROPA).

- The **right to object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.

Where the lawful basis for processing your data is **consent**, you have the **right to withdraw your consent at any time**. When you tell us you wish to exercise your right, we will stop further processing of such data. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent by contacting the Data Protection Officer, St Hilda's College, Cowley Place, Oxford OX4 1DY, [dpo@st-hildas.ox.ac.uk](mailto:dpo@st-hildas.ox.ac.uk), 01865 276803.

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk/>). You may also wish to contact the College's Data Protection Officer if you are considering how or whether to exercise your rights.

You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office if you believe that your data has been processed unlawfully.

### 11. Future changes to this privacy notice, and previous versions

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes, or to make St Hilda's College's or the University's operations and procedures more efficient. If the change is material, we will give you not less than two months' notice of the change so that you can decide whether to exercise your rights, if appropriate, before the change comes into effect. We will notify you of the change by e-mail or on our website.

#### *Version control:*

V.1	May 2018	Privacy Notices produced in line with GDPR guidance for different College audiences.
V.2	May 2024	Privacy Notice updated with new contact details, and for more consistent, accessible formatting. Privacy Notices for applicants, offer holders and current students combined into single notice. Website reference updated for Record of Processing Activities (ROPA).