**Wolfson College**

**Data Protection Policy**

The primary purpose of data protection legislation is to protect individuals against possible misuse of information about them held by others. It is the policy of the College to ensure that all members are aware of the requirements of data protection legislation in relation to their individual responsibilities.

The General Data Protection Regulation (GDPR) covers personal data, whether held on computer or in manual files/paperwork.

The College is obliged to ensure that all data shall:

1. be processed fairly and lawfully;
2. be held only for specified purposes and not used or disclosed in any way incompatible with those purposes;
3. be adequate, relevant and not excessive;
4. be accurate and kept up-to-date;
5. not be kept for longer than necessary for the particular purpose;
6. be processed in accordance with data subjects’ rights;
7. be kept secure;
8. not be transferred outside the European Economic Area unless the recipient country ensures an adequate level of protection.

The GDPR provides individuals with rights in connection with personal data held about them. It provides individuals with the right to access data concerning themselves (subject to the rights of third parties). It also includes the right to seek compensation through the courts for damages and distress suffered by reason of inaccuracy or the unauthorised destruction or wrongful disclosure of data. Information on how to make a request for access to personal data may be obtained from the PA to the Bursar.

All staff or other individuals who have access to, or who use, personal data, have a responsibility to exercise care in the treatment of that data and to ensure that such information is not disclosed to any unauthorised person. Examples of data include address lists and contact details as well as individual files. Any processing of such information must be done in accordance with the principles outlined above. To comply with the first principle (fair and lawful processing), at least one of the following conditions must be met:

* the individual has given his or her consent to the processing;
* the processing is necessary for the performance of a contract with the individual;
* processing is required under a legal obligation;
* processing is necessary to protect the vital interests of the individual;
* processing is necessary to carry out public functions;
* processing is necessary in order to pursue the legitimate interests of the controller or third parties (unless it could prejudice the interests of the individual).

In the case of sensitive personal data, which includes information about racial or ethnic origins; political beliefs; religious or other beliefs; trade union membership; health; sex life; criminal allegations, proceedings or convictions, explicit consent is required.

The College will take appropriate technical and organisational measures against unauthorised or unlawful processing of personal data and against accidental loss or destruction of or damage to personal data. All staff and members should be aware that guidelines and regulations relating to the security of manual filing systems and the preservation of secure passwords for access to relevant data held on computer should be strictly observed.

Staff should also note that personal data should not normally be provided to external parties unless specific arrangements have been put in place.

Personal data about an individual must not be placed on the world wide web unless the individual whose data is used has given his or her express consent.

Any failure to comply with the provisions of the GDPR could result in reputational and financial costs to the College. All staff and members must therefore familiarise themselves with the general aspects of Data Protection.

Any query on data protection should be addressed to the PA to the Bursar in the first instance.

A copy of the College’s data protection policy can be found at <https://www.wolfson.ox.ac.uk/policies/data-protection-policy>. More information about how we process and store your student data can be found: <https://www.wolfson.ox.ac.uk/data-protection>.