

Applicant Privacy Policy for Kellogg College

Published 1 September 2019

1. What is the purpose of this document?

Kellogg College, part of the University of Oxford, is committed to protecting the privacy and security of your personal information ('personal data').

This privacy policy describes how we collect and use your personal data during the application process, both before and after you submit your application, in accordance with the General Data Protection Regulation (GDPR) and related UK data protection legislation.

This policy applies to prospective postgraduate students. It is important that you read this policy, together with any other privacy policy we may provide on specific occasions when we are collecting or processing information about you, so that you are aware of how and why we are using the information. We may update this policy at any time.

2. Glossary

Where we refer in this policy to your 'personal data', we mean any recorded information that is about you and from which you can be identified. It does not include data where your identity has been removed (anonymous data).

Where we refer to the 'processing' of your personal data, we mean anything that we do with that information, including collection, use, storage, disclosure, deletion or retention.

3. Who is using your personal data?

Kellogg College ^[1] is the "data controller" for the information that we obtain from you or others as a result of your application for graduate study. This means that we decide how to use it and are responsible for looking after it in accordance with the GDPR.

Access to your data will be provided to the staff who need to view it as part of their work in carrying out the purposes set out in Section 6. We also share it with the third parties described in section 8.

4. The types of data we hold about you

The information we hold about you may include the following:

Personal details such as name, title, address, telephone number, email address, date of birth, sex and gender, marital status, and details of dependants;

- Education and employment information;
- Information about your use of our IT systems;
- Visa, passport and immigration information;

- Funding and financial support information.

We may also process the following "special categories" of more sensitive personal data:

- Information about your race or ethnicity, sexual orientation and religious beliefs;
- Information about your health, including any disability and/or medical condition;
- Information about criminal convictions and offences (if applicable to your course).

Special category data will not be available to those assessing your application and will only be used in accordance with section 7.

5. How did the University obtain your data

We collect the vast majority of the information directly from you, such as during your registration to use our online application form, through the application process and after you submit your application. We may also collect additional information from third parties, including former colleges, and funding bodies, and departments/faculties.

6. How the University uses your data

Before you submit your application, we process your data in order to administer our application process, such as to investigate a problem reported by you. Once you submit your application, we process your data for the purpose of processing and assessing your application for study, and for purposes related to your application, such as assessing your eligibility for funding and your financial status, and accommodation.

We set out below those circumstances where it is necessary for us to process your data. (These circumstances are not mutually exclusive; we may use the same information under more than one heading.)

Because we have a contractual obligation to consider your application

Information processed for this purpose includes the data listed in section 4 above.

We also need to process data under this heading where the University is working with a third party in order to offer you services, for example, those offered by colleges, sponsors (such as research councils), other universities or scholarship benefactors. See section 8 for a fuller list of examples of third party sharing.

Where we need to comply with a legal obligation

Information processed for this purpose includes, but is not limited to, information relating to the monitoring of equal opportunities. We are also required by law to provide data to various Government departments through the [Higher Education Statistics Agency \(HESA\)](#).

Where it is necessary to meet our legitimate interests

We also need to process your data in order to meet our legitimate interests or the legitimate interests of others. Examples include, but are not limited to, the following:

- sending you communications containing information on how to complete your application;
- notifying you of changes to course information and/or college provision.

Where we have your consent

There may be situations where we ask for your consent to process your data, for example pre-arrival communications (you will always be able to opt out of receiving such communications).

If you fail to provide personal information under 6 above

If you fail to provide certain information when requested under the circumstances described in 6 above, we may not be able to meet our contractual obligation to consider your application or to comply with our other legal obligations.

Change of purpose

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

Please note that we may process your data without your knowledge or consent where this is required or permitted by law.

7. Special category data and criminal conviction data

Special category data and criminal conviction data require a higher level of protection. Listed below are examples of processing activities that we regularly undertake in respect of these types of data. In addition to the activities listed below, it may sometimes be necessary to process this sort of information for exceptional reasons, for example, because it is necessary to protect your vital interests or those of another person. We may also process your special category data to identify your eligibility for certain scholarships (e.g. accessible accommodation provision).

Disability

We will process data about any disability in order to make any arrangements or adjustments required in relation to your application (e.g. to arrange access for interviews) and/or to monitor equal opportunities. This processing is necessary to meet our legal obligations.

Criminal conduct

Data about criminal convictions or barring decisions will only be collected if you have applied for certain courses, and where we are legally required to do so. If a course requires additional screening you will be advised before the screening takes place. Processing of this nature is necessary to meet our legal obligations and will be subject to suitable safeguards.

Racial or ethnic origin, sexual orientation and religious belief

Data about your racial and ethnic origin, religious belief or sexual orientation will only be processed where you have volunteered it and where we need to process it in order to meet our statutory obligations under equalities and other legislation. This processing is considered to meet a substantial public interest.

8. Data sharing with third parties

In order to perform our contractual and other legal responsibilities or purposes, we may, need to share your information with the following types of organisation:

- Colleges^[2];
- External organisations providing services to us, for example events' booking system;
- External organisations offering University-sponsored services including student surveys;
- The governmental departments or agencies responsible for immigration and student loans;
- If you have or are seeking a particular relationship with a third party, for example, because of an exchange scheme;
- Sponsors or benefactors of funding and financial support;

Where information is shared with third parties, we will seek to share the minimum amount necessary.

All third-party service providers that process data on our behalf are required to take appropriate security measures to protect your data in line with our policies. We do not allow them to use your data for their own purposes. We permit them to process your data only for specified purposes and in accordance with our instructions.

9. Transfer of your data outside of the European Economic Area (EEA)^[3]

There may be occasions when we transfer your data outside the EEA, for example, to obtain a reference or to verify information in your application. Such transfers will only take place if one of the following applies:

- the country receiving the data is considered by the EU to provide an adequate level of data protection;
- the transfer has your consent;
- the transfer is necessary for the performance of a contract with you or to take steps requested by you prior to entering into that contract; or
- the transfer is governed by approved contractual clauses.

10. Retention Period

We will retain your data only for as long as we need it to meet our purposes, including any relating to legal, accounting, or reporting requirements. Details of the retention periods for different types of student data are available [here](#).

If you enrol as a student, your data will be processed in accordance with our student privacy policy.

11. Your rights

Under certain circumstances, by law you have the right to:

- **Request access** to your data (commonly known as a “subject access request”). This enables you to receive a copy of your data and to check that we are lawfully processing it.
- **Request correction** of your data. This enables you to ask us to correct any incomplete or inaccurate data we hold about you.
- **Request erasure** of your data. This enables you to ask us to delete or remove your data in certain circumstances, for example, if you consider that there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).
- **Object to processing** of your data where we are relying on our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your data for direct marketing purposes.
- **Request the restriction of processing** of your data. This enables you to ask us to suspend the processing of your data, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your data to another party.

Depending on the circumstances and the nature of your request it may not be possible for us to do what you have asked, for example, where there is a statutory or contractual requirement for us to process your data and it would not be possible to fulfil our legal obligations if we were to stop. However, where you have consented to the processing (for example, where you have asked us to send you certain types of communication), you can withdraw your consent at any time, by emailing us at dataprotection@kellogg.ox.ac.uk. In this event, we will stop the processing as soon as we can. If you choose to withdraw consent it will not invalidate past processing and it may impact our ability to provide particular additional services to you. Further information on your rights is available from the [Information Commissioner’s Office \(ICO\)](#).

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, please contact the Kellogg Data Protection Officer (currently Gary Walker) at dataprotection@kellogg.ox.ac.uk or you may contact the University’s Information Compliance Team at data.protection@admin.ox.ac.uk. The same email address may be used to contact the University’s Data Protection Officer. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

If you remain dissatisfied, you have the right to lodge a complaint with the ICO at <https://ico.org.uk/concerns/>.

12. Keeping your data up-to-date

It is important that the data we hold about you is accurate and current. You can access, amend and delete your data yourself until the point at which you submit your application to the University. Please keep us informed of any changes after you submit your application.

13. Changes to this privacy policy

We reserve the right to update this privacy policy at any time, and will seek to inform you of substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

Last updated 1 September 2019.

[1] Kellogg College is a Society of the University of Oxford; The University's legal title is the Chancellor, Masters and Scholars of the University of Oxford

[2] College means any college or Permanent Private Hall

[3] The EU plus Norway, Liechtenstein and Iceland