

## Westminster College Data protection statement and privacy notice: Short Course Delegates

This statement explains how Westminster College handles and uses personal data we collect about members of college, other than Students who are covered by a separate privacy notice. Where in this statement we refer to 'we' or 'our' or 'us' we are referring to Westminster College, Cambridge and where we refer to 'you' or 'your' we are referring to members of college. We are registered with the Information Commissioner's Office (ICO) with registration number Z6779220.

We are committed to protecting your personal information and to being transparent about what information we hold. Westminster College understands its obligations to you to help you understand how and why we process your personal data. This notice tells you about these uses and should be read in conjunction with the Westminster College data protection policy.

Our data protection policy and procedures are governed by the Data Protection Act (DPA) 1998 and, from 25<sup>th</sup> May 2018, the EU General Data Protection Regulation. The law in this area is changing rapidly and we anticipate this statement may be revised in line with guidance from the Information Commissioner's office.

### **Why we hold your personal data**

Holding your personal data enables us to communicate with you about courses on which you are enrolled, including logistical communications, eg about dietary requirements and accommodation.

We will also process your personal information in other circumstances, **provided you have given your consent for us to do so.**

### **Lawful basis for processing personal data**

The lawful basis for processing the personal data of short course delegates as described in this document is **consent**.

If you make a donation or payment to us then the lawful basis for processing the personal data is to **comply with legal obligations**.

There may be statutory requirements for you to provide personal data, without which we will be unable to facilitate visa applications for you.

Westminster College may also store some of your personal data in accordance with other privacy notices (e.g. if you are resident at Westminster College or have given consent for marketing).

### **Personal data held by Westminster College**

The information we hold is that which you provide to us (for example, you may give us information by filling in forms on our website, or by corresponding with us by post, telephone, email or otherwise).

In common with all data subjects:

- Your name
  - Your contact details
  - Unique personal identifiers and biographical information (e.g. date of birth)
  - photographs of you;
  - your attendance at Westminster College or Cambridge Theological Federation ("CTF") events;
  - personal data provided by you for a specific purpose or purposes (for example, disability, catering preferences or lifestyle status for event management);
  - information related to the prevention and detection of crime and the safety of staff and students including, but not limited to, CCTV recording;
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Also

- financial information relating to transactions you have made with us;
- your visa requirements; copies of passports, visas, and other documents required to ensure compliance with Home Office requirements.

Particular to short-course delegates

- Course dates

### **Sensitive personal data held by Westminster College**

The information we hold is that which you provide to us (for example, you may give us information by filling in forms on our website, or by corresponding with us by post, telephone, email or otherwise).

Records may contain:

- Your ordained status.

### **How your personal data is used by Westminster College**

Your data is used by us for a number of purposes including :

All data subjects:

- Publications, invitations and other communications.
- e-news and flash emails.
- internal reporting and record keeping.
- the promotion of college events.
- administrative purposes (e.g. in order to process fees payments or to administer an event you have registered for or attended).
- Responding to data access requests you make.

Also:

- Giving key fob access to parts of the premises.
- the college archives.
- Contacting you, your next of kin, or other relevant contact in case of an emergency.

Particular to short-course delegates

- Providing or offering facilities and services to you during your time as a student (e.g. library access, computing).

Communications to you may be sent by post, telephone or electronic means (including email and social media), depending on the contact details we hold and the preferences expressed by you about the types of communications you wish to receive.

If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address given below. We will always respect a request by you to stop processing your personal data, and in addition your statutory rights are set out below.

### **Sharing your data with others**

Within Westminster College, personal data, including sensitive personal data, may be shared between members of staff, including Trustees, who legitimately need the information to carry out their normal duties to support your time with us. We endeavour to ensure that sensitive personal data is only shared with colleagues with your explicit consent. However, circumstances may arise where this data is shared with colleagues without gaining your consent. This will only occur if it is necessary to protect your vital interests or the vital interests of another person; or for certain other reasons where it is not possible or appropriate to gain your consent such as disclosures to the police for prevention or detection of crime, or to meet statutory obligations relating to equality monitoring.

Westminster College may disclose certain personal data to third parties. These external organisations, and the purpose for sharing the information, are set out below:

- Relevant data will be shared with the Cambridge Theological Federation.
- Relevant data will be shared with Home Office, UK Visas and Immigration (UKVI) in order to fulfil CTF's obligations as a visa sponsor.
- Information may also be shared with our auditors, on demand.

- **With your permission** we may share information about you for publicity and marketing purposes online, in print and on social media.

Otherwise, Westminster College does not share data with any third party, except as allowed for in other privacy notices or required by law. We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them.

#### **Transfer of personal data to other countries**

Where data is shared within the UK, or the European Union (EU), the third party will be required to comply with and safeguard the data under the terms of the DPA and appropriate EU regulations.

Your personal information will only be transferred to countries, outside of the EU, whose data protection laws have been assessed as adequate by the European Commission, or where adequate safeguards, such as the EU-US Privacy Shield, are in place.

#### **How long data is kept**

We will retain your data as part of our financial records for seven years in line with tax legislation. Data will be securely destroyed when no longer required.

Where you exercise your right to erasure, we will continue to maintain a core set of personal data (name, dates of studying at Westminster College and date of birth) to ensure we do not contact you inadvertently in future, and to maintain your record for archive purposes. We may also need to retain some financial records about you for statutory purposes (e.g. accounting matters).

## Your rights

You have the following rights

<b>To be informed</b>	This Privacy Notice provides the information you are entitled to receive
<b>Access</b>	<p>Please contact us if you would like confirmation that your data is being processed and access to your personal data.</p> <p>There is no charge for us providing you with this data and it will usually be provided within a month of the request (unless the request is unfounded or excessive).</p>
<b>Rectification</b>	<p>Please inform us of any data which you would like rectified and we will usually respond within a month of the request.</p> <p>We will pass on the changes to any third parties who need to change their records and let you know this has been done.</p>
<b>Erasure</b>	You may exercise your right to have your personal data erased in a number of circumstances (e.g. if the data is no longer necessary in relation to the purpose for which it was created or you withdraw your consent). Where possible we will comply with all such requests, though some details are part of the College's permanent records (e.g. examination results, college photographs) which can not reasonably be deleted.
<b>Restrict processing</b>	<p>You can tell us that we can keep your data but must stop processing it, including preventing future mailings and communications.</p> <p>If possible we will inform any third parties to whom your data has been disclosed of your requirement.</p>
<b>Data portability</b>	Your data is across manual records and a bespoke Access database. We will do our best to provide information in a portable format but it is unlikely that we can create systems to do so.
<b>To object</b>	<p>If we can, we will stop processing your data if you object to processing based on legitimate interests or the performance of a task in the public interest / exercise of official authority (including profiling).</p> <p>We will stop processing your data for direct marketing if you tell us to.</p> <p>We will stop processing your data if you object to processing for purposes of research and statistics.</p>
<b>Not to be subject to automated decision-making including profiling</b>	We do not use any automated decision-making.

You have the right to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/concerns>.

### Further information

The controller for your personal data and our Data Protection Lead is the Bursar of Westminster College who can be contacted via [gdp@westminster.cam.ac.uk](mailto:gdp@westminster.cam.ac.uk) or Westminster College, Madingley Road, Cambridge, CB3 0AA.

Our Data Protection Lead is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data. Please contact us at [gdp@westminster.cam.ac.uk](mailto:gdp@westminster.cam.ac.uk) if you have any concerns or questions about the above information or you wish to ask us not to process your personal data for particular purposes or to erase your data. Where you have specific requests relating to how we manage your data, we will endeavour to resolve these, but please note that there may be circumstances where we cannot comply with specific requests.

We will publish on our website any changes we make to this data protection statement and notify you by other communication channels where appropriate.