



# Wadham College Privacy Notice:

## Further information on records related to finance, commercial or related administration

This document provides further information for anyone whose has personal data in financial, commercial or related records processed by Wadham College. This concerns financial administration for members of the College but also suppliers/contractors and records processed for property transactions and other accounting purposes. It forms part of, and should be read in conjunction with, the privacy notice of Wadham College, available on the [College's GDPR webpage](#).

In this notice Wadham College may also be used to mean its subsidiaries and affiliates Wadham College Services Ltd, Wadham College Design & Build Ltd, and Boathouse Consortium Ltd.

Below is the further information for the relevant sections in the master Privacy notice (section number provided in brackets).

### 1. How we obtain your data (Section 5)

Data that we hold on you may come from different sources: we might receive it from you; we might create it ourselves, or we might receive it from a third party.

Apart from the data that you provide to us, we may also process data about you that we generate about you, or that we receive from a third party (for example banks who provide us with your details when payments are made or received by Wadham College).

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

- Supplier and contractor information which may include names and contact details of individuals.
  - Records relating to event, merchandise and other sales and purchases.
  - Records relating to conference/event bookings.
  - Title documents, transfers, leases and contracts which include the names of parties, signatories and witnesses.
  - Budget documents, audit and accounting documents, management accounts, investment documents and communications relating to such records all of which may include names and contact details of individuals responsible for or involved with the budgets/accounts/investments.
  - Bank account records, including names of payees and transaction details.
  - Governing body and committee agenda, governance documents, and some legal, financial, buildings and architectural records held in the College archives.
  - Records generated for legal or statutory compliance purposes that contain names and/or associated personal data.
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## 2. Details of our processing activities, including our lawful basis for processing

The law requires that we provide you with information about the purpose for which we process your data and the related lawful basis. Examples of the ways in which we process your data are as follows:

- Data on the selection of contractors/suppliers, including information about the quality and/or value of the work or products. The lawful basis for such processing is that the College has a legitimate interest in engaging suppliers and contractors that meet its required standards.
- Data that you provide will be a necessary requirement of your transaction with the College. If you do not provide your data, we will not be able to process the transaction.
- Data in title documents, contracts, transfers and leases. Where you are a contracting party, the lawful basis for such processing is that the processing is necessary for performance of our contract with you. Otherwise, or after conclusion of any contract, the College has a legitimate interest in entering contracts, leases and transfers of land, and in retaining records and title documents to assist with the management of its properties.
- Data required for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom of information legislation, records made to comply with safeguarding, health and safety or counter-terrorism legislation, in connection with legal advice or claims, or to comply with auditors' requirements.
- legal, financial, buildings and architectural records held in the College archives, 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.

Where Special Category data or data relating to criminal convictions or allegations is processed, this will be as set out in the Wadham College Privacy notice. Our grounds for processing Special Category data are provided in a detailed record of our processing activity available from the Data Protection Officer (see section 4 below).

## 3. How long we keep your data (Section 12)

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

The retention period, will depend on the category of the data. As a general guide, our expected retention period is normally seven years following the end of the financial year to which the record relates. There are some exceptions, for example records required for VAT purposes may be retained for up to 10 years and those relating to title deeds for 12 years. Legal, financial, buildings and architectural records held in the College archives will be retained permanently.

A full record of our processing activity, including the lawful basis on which we rely and expected retention periods is available on request from the Data Protection Officer at Wadham College.

## 4. Contact Details (Section 2)

If you have queries regarding the above information then please contact [accounts@wadham.ox.ac.uk](mailto:accounts@wadham.ox.ac.uk)

A full record of our processing activity is available on request from the Data Protection Officer at Wadham College.

Data Protection Officer, Wadham College, Parks Road, Oxford OX1 3PN

Email: [data.protection@wadham.ox.ac.uk](mailto:data.protection@wadham.ox.ac.uk); Tel: (01865) 277900

## 5. Version Control

| Version | Date        | Changes & Approvals                        |
|---------|-------------|--|
| 0.1     | 20 May 2018 | Draft for Discussion                       |
| 0.2     | 21 May 2018 | Incorporating changes from GDPR Advisor    |
| 1.0     | 23 May 2018 | Approved for publication by Governing Body |