



Wadham College Privacy Notice: Further information on College ICT Functions

This document provides further details for anyone who uses Wadham College Information and Communication Technology (ICT) systems including email and telephones/mobile devices, including our staff and students. 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)

Provided by you

In most cases the data you provide will be a necessary requirement of using the relevant system (for example, you will need a password to access College ICT systems). If you do not provide such data you will not be able to use the system, and depending on circumstances this may become a disciplinary matter that could lead to the termination of your contract with us whether you are an employee, or a student.

Generated by us or provided by others

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

- The University of Oxford, which operates a number of systems that Colleges have access to, including email.
- Information that we generate in the course of operating the College's ICT systems, or which we obtain from third party suppliers, for example telephone records or your Internet Service Provider.
- Firewall, security and PC misuse incident log files consisting of the date and time of incident, which user (name and/or user name), details of the incident and any consequential action taken.
- IT support logs and records consisting of user names/contact information, dates and times of requests/problems, details of requests and details of steps taken and resolution of requests.
- Door Access Controls.
- Information on Electronic Bookings of College Facilities (e.g. rooms, car parking, equipment) by students, staff, fellows, contractors and visitors.

- Data that Students or Fellows choose to store in personal data storage areas on College Servers (e.g. student work, research, administration).

2. Details of our processing activities, including our lawful basis for processing (Section 9)

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:

The lawful grounds on which we process your data are normally the following:

- Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms. For example, the College has a legitimate interest in maintaining the integrity of its systems, to investigate misuse and taking action to prevent misuse recurring.
- Processing is necessary for compliance with a legal obligation. The College has security and accountability obligations under data protection laws.
- In the case of staff and students, processing is necessary for performance of our contract with you.

Where Special Category data or data relating to criminal convictions or allegations is processed, this will be as set out in the Further information relevant to the relationship which we have with you. 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 periods are as follows:

3 months after expiry of the University card	Data stored in students' home folders
1 year	Login information, internet use logs, Door access controls Electronic bookings for College facilities Backups of servers and systems
After 1 year of inactivity	Information on College members for IT systems (University card details; email address etc) Device information
Normally retained for 3 years and deleted in the 4th year, but may be retained for up to 7 years.	IT support logs
7 years	Firewall, security and PC misuse incidents Records of telephone calls (and invoices)
7 years after expiry of the University card	Data stored in Fellows' home folders
As long as you are entitled to use the College systems plus 1 year	Password and access level information

4. Contact Details (Section 3)

If you have queries regarding the above information then please contact it-support@wadh.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; 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