



The Society of St Stephen's House and SJE Supporters, Volunteers and Friends

## **The Society of St Stephen's House Privacy Notice concerning Supporters, Volunteers and Friends of SJE Arts**

### **A summary of what this notice explains**

The Society of St Stephen's House is committed to protecting the privacy and security of personal data. This notice explains what personal data The Society of St Stephen's House holds about supporters, volunteers and friends of SJE Arts ("you"), how we use it internally, how we share it, how long we keep it and what your legal rights are in relation to it.

For the parts of your personal data that you supply to us to us, this notice also explains the basis on which you are required or requested to provide the information. For the parts of your personal data that we generate about you, or that we receive from others, it explains the source of the data. We process your personal data on the basis of your consent. This notice sets out the categories and purposes of data where your consent is needed.

The Society of St Stephen's House has also published separate notices, which are applicable to other groups and activities. Those notices may also apply to you, depending on your circumstances, and it is important that you read this privacy notice together with other applicable privacy notices:

1. current students
2. current staff, office holders and senior members
3. applicants for staff posts
4. applicants as prospective students
5. attendees of conferences and events
6. organisations with which we have a commercial relationship
7. security, maintenance and health and safety (including how we use CCTV)
8. website and cookies (including how we monitor use of our website)

You can access these and past versions of our privacy notices, which are available on our public website at the location: <https://www.ssho.ox.ac.uk/about/policies.html>

### **What is your personal data and how does the law regulate our use of it?**

"Personal data" is information relating to you as a living, identifiable individual. We refer to this as "your data".



The Society of St Stephen's House and SJE Supporters, Volunteers and Friends

“Processing” your data includes various operations that may be carried out on your data, including collecting, recording, organising, using, disclosing, storing and deleting it.

Data protection law requires us:

- To process your data in a lawful, fair and transparent way;
- Only to collect your data for explicit and legitimate purposes;
- Only to collect data that is relevant, and limited to the purpose(s) we have told you about;
- To ensure that your data is accurate and up to date;
- To ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- To ensure that appropriate security measures are used to protect your data.

### **The Society of St Stephen's House's Contact Details**

If you need to contact us about your data, please contact: [dpo@ssho.ox.ac.uk](mailto:dpo@ssho.ox.ac.uk)

### **What personal data we hold about you and how we use it**

We may hold and use contact and commercial data about you at different stages of our relationship with you. We might receive this data from you; we might create it ourselves, or we might receive it from someone else (for example, the University or ticketing agencies).

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

- Contact details that you provide to us, including names, addresses and telephone numbers.
- Dietary and accessibility requirements
- Photographs, audio and video recording of College events that you attend.

We have a downloadable, detailed table (ROPA – Records of Processing Activities) setting out the processing activities that we undertake, the source of the data, the reasons why we process it, how long we keep it and the lawful basis we rely on for both your personal and special category data, and is available on our public website at the location: <https://www.ssho.ox.ac.uk/about/policies.html>

### **The lawful basis on which we process your data**

The law requires that we provide you with information about the lawful basis on which we process your personal data, and for what purpose(s). Most commonly, we will process your data on the following lawful grounds:



## The Society of St Stephen's House and SJE Supporters, Volunteers and Friends

- Where it is necessary to perform the contract we have entered into with you;
- Where necessary to comply with a legal obligation;
- Where it is necessary for the performance of a task in the public interest;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests. In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent.

### *How we apply further protection in the case of "Special Categories" of personal data*

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. The Special Categories of personal data consist of data revealing:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership.

They also consist of the processing of:

- genetic data;
- biometric data for the purpose of uniquely identifying someone;
- data concerning health;
- data concerning someone's sex life or sexual orientation.

We may process special categories of personal data in the following circumstances:

- With your explicit written consent; or
- Where it is necessary in the substantial public interest, in particular:
  - is necessary for the purposes of the prevention or detection of an unlawful act, must be carried out without the consent of the data subject so as not to prejudice those purposes; or
  - for equal opportunities monitoring;



## The Society of St Stephen's House and SJE Supporters, Volunteers and Friends

- Where the processing is necessary for archiving purposes in the public interest, or for scientific or historical research purposes, or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law.

We have in place an appropriate policy document and/or other safeguards which we are required by law to maintain when processing such data.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

### **Details of our processing activities, including our lawful basis for processing**

We have prepared a detailed table, available from our Policies webpage, setting out the processing activities that we undertake, the source of the data, the reasons why we process it, how long we keep it and the lawful basis we rely on.

The table includes detailed information about how and why we process various categories of data, and the related lawful basis. It includes monitoring that may occur of use of telephone and IT services, including, subject to certain safeguards, email content, internet use and/or telephone records for the purpose of ensuring that such services are not used for unlawful purposes, or otherwise breach the College's or University's IT and telecoms regulations and policy. Safeguards are set out in the policy documents to ensure that an individual's privacy is respected appropriately.

The lawful basis for such processing is that The Society of St Stephen's House has a legitimate interest in maintaining the integrity of its systems, to investigate misuse and in taking action to prevent misuse recurring.

### **Profiling**

The Society of St Stephen's House may analyse the personal information we collect about you, including your known interests, activities and/or hobbies, in order to build a profile which helps us to decide what communications are likely to be of interest to you. In addition to information that you have provided to the College over time, we may be given information by your family, friends, colleagues and acquaintances. We may also seek out information, using public databases, in order to fill-in gaps in our knowledge and thereby deepen our relationship with you.



## The Society of St Stephen's House and SJE Supporters, Volunteers and Friends

While we do have a legitimate interest in carrying out such analysis, you have the right to request that we do not process your personal data in this way.

We do not outsource profiling activity. If we decide to outsource such activity in the future, we will inform you of who we are outsourcing the activity to and provide you with not less than 1 months' notice of this.

### **Data that you provide to us and the possible consequences of you not providing it**

Most data that you give to us is provided on a wholly voluntary basis – you have a choice whether to do so. Examples include:

- Disability and health condition information, which you may choose to provide to us in order that we can take this information into account when considering whether to make a reasonable adjustment under the Equality Act 2010, for example in relation to accessibility.
- Gift Aid information, which you may choose to provide while making philanthropic donations in order that the College and/or the University is able to recover Gift Aid amounts in relation to your donations.

The consequences for any failure to provide such data will depend on the particular circumstances. For example, if you decide not to provide information about your disability, this might mean that we cannot make a reasonable adjustment to assist you.

### **Other sources of your data**

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

- Data that we generate about you, such as when communicating with you, and/or inviting you to or arranging your attendance at events;
- Third parties who process ticket purchases that you make to the event
- Local and international media sources, when you are mentioned in published articles, lists or other commentary;

Our Record of Processing Activity (ROPA) indicates the sources of each of the various categories of data that we process. These can be found on the Policies page on our public website.



### How we share your data

We will not sell your data to third parties. We will only share it with third parties if we are allowed or required to do so by law. This includes for example where we decide to report alleged criminal misconduct to the police.

Examples of bodies to whom we are required by law to disclose certain data include, but are not limited to:

Organisation	Why?
UK agencies with duties relating to the prevention and detection of crime, apprehension and prosecution of offenders, safeguarding, or national security.	We may share data with government departments, crime prevention and law enforcement agencies when required or considered appropriate in the circumstances and with the proper consideration of your rights and freedoms. [in cases where the law places a duty on us to report]
HM Revenues and Custom (HMRC)	Information released to HM Revenue and Customs in order to collect Gift Aid contributions

Examples of bodies to whom we may voluntarily disclose data, in appropriate circumstances, include but are not limited to:

Organisation	Why?
Third party service providers	To facilitate activities of The Society of St Stephen's House or SJE. Any transfer will be subject to an appropriate, formal agreement between The Society of St Stephen's House or SJE, and the processor.
UK agencies with duties relating to the prevention and detection of crime, apprehension and prosecution of offenders, safeguarding, or national security.	We may share data with government departments, crime prevention and law enforcement agencies when required or considered appropriate in the circumstances and with the proper consideration of your rights and freedoms.

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

All our third party service providers are required to take appropriate security measures to protect your personal information in line with our policies, and are only permitted to process your personal data for specific purposes in accordance with our instructions. We do not allow our third party providers to use your personal data for their own purposes.

### Sharing your data outside the European Union

The law provides various further safeguards where data is transferred outside of the EU.



## The Society of St Stephen's House and SJE Supporters, Volunteers and Friends

When you are resident outside the EU in a country where there is no “adequacy decision” by the European Commission, and an alternative safeguard is not available, we may still transfer data to you which is necessary for performance of your contract with us (if you are a staff member or student).

Otherwise, we may transfer your data outside the European Union, but only for the purposes referred to in this notice and provided either:

- There is a decision of the European Commission that the level of protection of personal data in the recipient country is adequate; or
- Appropriate safeguards are in place to ensure that your data is treated in accordance with UK data protection law, for example through the use of standard contractual clauses; or
- There is an applicable derogation in law which permits the transfer in the absence of an adequacy decision or an appropriate safeguard.

### **Automated decision-making**

We do not envisage that any decisions will be taken about you based solely on automated means, however we will notify you in writing if this position changes.

### **How long we keep your data**

We retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements. The detailed record of processing activities (ROPA) explains how long we will keep your data. This can be found on the Policies page on our public website.

Retention periods may increase as a result of legislative changes, e.g. an increase in limitation periods for legal claims would mean that the College is required to retain certain categories of personal data for longer. Any such changes will be reflected in updated versions of our Record of Processing Activity. If there are legal proceedings, a regulatory, disciplinary or criminal investigation, suspected criminal activity, or relevant requests under data protection or freedom of information legislation, it may be necessary for us to suspend the deletion of data until the proceedings, investigation or request have been fully disposed of. Please note that we may keep anonymised statistical data indefinitely, but you cannot be identified from such data.

### **Your legal rights over your data**

Subject to certain conditions set out in UK data protection law, you have:



## The Society of St Stephen's House and SJE Supporters, Volunteers and Friends

- The **right to request access** to a copy of your data, as well as to be informed of various information about how your data is being used;
- The **right to have any inaccuracies in your data corrected**, which may include the right to have any incomplete data completed;
- The **right to have your personal data erased** in certain circumstances;
- The **right to have the processing of your data suspended**, for example if you want us to establish the accuracy of the data we are processing.
- The right to receive a **copy of data you have provided to us**, and have that transmitted to another data controller (for example, another University or College).
- The **right to object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- The **right to object to the processing of your information** if we are relying on a “legitimate interest” for the processing or where the processing is necessary for the performance of a task carried out in the public interest. The lawful basis for any particular processing activity we carry out is set out in our detailed table of processing activities [LINK].
- The **right to object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.
- Where the lawful basis for processing your data is **consent**, you have the **right to withdraw your consent at any time**. When you tell us you wish to exercise your right, we will stop further processing of such data. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent. You may withdraw your consent by contacting **the relevant office within** The Society of St Stephen's House **that you are dealing with or that is processing your data, or by contacting the** The Society of St Stephen's House's **Data Protection**

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk/>). You may also wish to contact the The Society of St Stephen's House's Data Protection Officer [dpo@ssho.ox.ac.uk](mailto:dpo@ssho.ox.ac.uk) if you are considering how or whether to exercise your rights.

You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office if you believe that your data has been processed unlawfully.



The Society of St Stephen's House and SJE Supporters, Volunteers and Friends

### **Future changes to this privacy notice**

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes or to make the College or University's operations and procedures more efficient. If the change is material, we will give you not less than two months' notice of the change so that you can decide whether to exercise your rights, if appropriate, before the change comes into effect. We will notify you of the change by means of updates on the primary public website. You can access past versions of our privacy notices at the location:

<https://www.ssho.ox.ac.uk/about/policies.html>

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