

FINANCE, COMMERCIAL AND RELATED ADMINISTRATION

This privacy notice applies to anyone whose personal data is processed by Trinity College as a supplier/contractor, or in connection with property transactions, for accounting, administrative and similar purposes

A summary of what this notice explains

Trinity College is committed to protecting the privacy and security of personal data.

There are separate privacy notices covering processing of staff, student and others' data, including users of the College website, which are available here.

<https://www.trinity.ox.ac.uk/privacy>

This notice explains what personal data Trinity holds about 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, 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.

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”.

“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;
- To only collect your data for explicit and legitimate purposes;
- To only 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.

Trinity's Contact Details

If you need to contact us about your data, please contact: the college's Data Protection Officer by email dpo@trinity.ox.ac.uk by Phone 01865 279890 or by post DPO, Trinity College, Broad Street, Oxford, OX1 3BH

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

In most cases, the data 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.

Other sources of your data

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 Trinity).

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 purposes.

Most commonly, we will process your data on the following lawful grounds:

- Where it is necessary for performance of our contract with you;
- Where it is necessary in order to take steps at your request prior to entering a contract.
- 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.
- Where it is necessary to perform the contract we have entered into with you;
- Where necessary to comply with a legal obligation;

We may also use your data, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests.

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

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

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;
- 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 data 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 data public.

Criminal convictions and allegations of criminal activity

Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. We may process such data on the same grounds as those identified for "special categories" referred to above.

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

We have prepared a detailed table 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.

<https://sharepoint.nexus.ox.ac.uk/sites/trinity/gdpr>

The table includes detailed information about how and why we process various categories of data, and the related lawful basis. It includes processing of data:

- about 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.
- 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.
- 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.

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.

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.

More information on the categories of recipients of your data is set out in a table here:

<https://sharepoint.nexus.ox.ac.uk/sites/trinity/gdpr>

Sharing your data outside the European Union

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

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 will not transfer your data outside the European Union without first notifying you of our intentions and of the safeguards that apply to your data.

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

The detailed table of processing activities explains how long we will keep your data.

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 **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 College’s Data Protection Officer

Further guidance on your rights is available from the Information Commissioner’s Office (<https://ico.org.uk>). You may also wish to contact the Trinity’s Data Protection Officer dpo@trinity.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.

Future changes to this privacy notice, and previous versions

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes, if the University or College makes changes to its procedures, or to make College’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 email.

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