



Data Protection Statement for College Visitors and Guests

How we use your personal information

This statement explains how St Edmund's College ("we" and "our") handles and uses information we collect about visitors, guests and attendees of the College ("you" and "your"), for events and other reasons. In broad terms, we use your information to manage your visit or the event(s) you are attending, including dinners, accommodation and other needs requested by you, as well as to maintain our records of previous, current and future attendees for events management by the College. This Data Protection Statement is reviewed regularly and updated where necessary to reflect changes to the College's processing activities, including where personal data is used for a new or materially different purpose.

The controller for your personal information is St Edmund's College, Mount Pleasant, Cambridge CB3 0BN. The Data Protection Officer for the College is Intercollegiate Services Limited (ISL) (64 Bridge Street, Cambridge CB2 1UR; 01223 768745; dpo@isl.colleges.cam.ac.uk). ISL should be contacted if you have any concerns about how the College is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement.

The person within the College with overall responsibility for the protection of information is the Senior Information Risk Owner, who at the time of issue is the Bursar. The Bursar can be contacted at bursar@st-edmunds.cam.ac.uk. Day-to-day responsibility for monitoring compliance with relevant legislation and dealing with concerns relating to the College's data protection arrangements sits with the College Data Protection Lead, who at the time of issue is the Governance, Risk & Compliance Manager. The Governance, Risk & Compliance Manager is the primary contact for all data protection matters and can be contacted at grcm@st-edmunds.cam.ac.uk. This is also the address to use if you wish to exercise any of your data protection rights, including requesting copies of personal data the College holds about you, or making a complaint about how the College has managed your personal data.

The legal basis for processing your personal information is that it is necessary in order to take steps to enter into, or perform, a contract to provide facilities, accommodation, events or other services to you. In some cases, we may also process your personal information because it is necessary for compliance with a legal obligation, for the College's legitimate interests, to protect vital interests, or because you have given consent, for example where consent is required for particular communications or optional services. Where we process special category data, such as health, disability, allergy, dietary or religious information, we will also identify an appropriate condition under Article 9 UK GDPR. We will retain your information for the periods stated below unless a longer period is necessary and lawful, or unless you ask us to stop processing it and we are able to do so.

How your data is used by the College

We collect and process your personal information for the following purposes:

- A. maintaining clear contact information for the booking, provision and payment of services:

We will hold your name, address, email address, phone number and other relevant contact details you provide to us, and will use this information to maintain contact with you to provide your requested services, manage their delivery and bill you for them. We retain relevant information

in our events records for five years after the most recent visit or event you attend. If you are a member of the College (including if you are a former student), we may provide our Development Office with your contact details in order for them to update their records, where you have agreed to this or where this is otherwise lawful and consistent with the relevant Data Protection Statement;

B. providing you with necessary and preferred services:

Where relevant, we will also collect data for the provision of services, your reason(s) for attending the event, your nationality and passport details, your car registration, your payment information and/or any service preferences you request specifically (e.g. room type, dietary requirements, amenities requested). This may include you providing special category data, such as health, disability, allergy, dietary or religious information. We will not retain this information for any longer than necessary for the provision of the specific event or visit, unless a longer retention period is necessary and lawful, which might require you to provide it on successive occasions;

C. providing you with details about future College events:

While we retain your contact information, we will contact you about future College events we believe may be of interest to you, providing you have given us explicit consent to do so where consent is required. Consent may be withdrawn at any time; and

D. fulfilling our legal obligations:

The College is required to keep for 12 months the names and nationalities of all those staying in accommodation. In the case of nationals of countries outside the UK, Republic of Ireland and the Commonwealth, we must also keep a record of your passport details and next destination. The College is also required to keep details relating to any financial transaction for a period of seven years, or such other period as may be required by law, regulation, accounting requirements or the College's records retention arrangements.

We also operate CCTV and Automatic Number Plate Recognition (ANPR) systems on our sites. These may capture images of individuals and, in the case of ANPR, vehicle registration marks. CCTV and ANPR are used for purposes including safety and security, crime prevention and detection, protection of College buildings, assets and information, management of emergencies and incidents, health and safety, and parking management and enforcement. Routine CCTV and ANPR recordings are normally retained for no more than 30 days, unless they are required in connection with an incident, investigation, legal claim or other lawful purpose. CCTV may also be used to live-stream or record selected events where this is compatible with data protection requirements and appropriate notice has been given. Our CCTV and ANPR Policy can be viewed at www.st-edmunds.cam.ac.uk/data-protection.

We do not sell your personal information. We may share personal information with third parties where this is necessary and lawful, for example with payment providers, event organisers, accommodation or catering providers, IT or booking system providers, professional advisers, insurers, emergency services, law enforcement bodies, public authorities, or other service providers acting on our behalf. Where a third party processes personal information on our behalf, appropriate contractual arrangements will be in place. Where personal information is transferred outside the UK and the UK GDPR transfer rules apply, the College will ensure that an appropriate transfer mechanism and any required safeguards are in place. If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address given above.

Your rights

You have the right: to ask us for access to, rectification or erasure of your information; to restrict processing (pending correction or deletion); to object to marketing processing in certain circumstances, including direct marketing communications; to ask for the transfer of your information electronically to a third party (data portability); and to object to processing in certain circumstances. Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them where the law allows us to do so.

Complaints

If you are concerned about how the College has handled your personal data, you may raise this with the College Data Protection Lead, the SIRO or the DPO using the contact details above. The College will consider data protection complaints fairly and proportionately, and will normally acknowledge receipt within 30 days.

You retain the right at all times to lodge a complaint about our management of your personal information with the Information Commission at <https://ico.org.uk/concerns>.