

# Wadham College Supplementary Privacy Notice for Wadham Students

## Data Processing during the Coronavirus Pandemic

In common with the rest of the University of Oxford, Wadham College moved largely to remote working in mid-March following Government guidance related to Coronavirus. The main privacy notice for Wadham College and the 'Further Information for Students', available on the College's [GDPR Framework page](#), contain full information on how we collect, use and protect personal data generally and your rights as a data subject. This supplementary privacy notice explains how the College will process personal data specifically with regard to the coronavirus pandemic and any follow-up period.

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

### **Medical or welfare data:**

You may be asked for personal data, including sensitive personal data, that you have not previously supplied. This may be requested in order to protect your vital interests or the health and safety of others, or to enable the College to continue to provide services and support. This could include, but is not limited to, medical data or data related to home circumstances which may impact on teaching and learning.

### **Video Conferencing:**

The use of video conferencing has become a necessity in order to provide continued education for students, for academic research and other related activities to progress, for the management of the College and the support of all members of the College community.

The data processed may include, but is not limited to, the image and voice of participants in meetings unless their camera and/or microphone are turned off, logs of participation, and chat records. This may include special category data if ethnicity and disability are evident.

Tutorials/classes will normally only be recorded in exceptional cases where this has been assessed as a reasonable adjustment for a student by the University's Disability Advisory Service. All participants will be alerted to any proposed recording and will be able to object. Any student given permission to record on their own device will be bound by University policies and must delete this data on completion of their studies. The College will not have control over such recordings.

As with all remote systems, data, such as IP address, ISP, other system data, and analytics, is collected by the service providers and will be processed in accordance with their privacy notice. Some of this data may be stored outside the EU.

The College will take steps to ensure that settings on video conferencing systems are as secure as possible and that the minimum amount of data is collected. Data processed and held by the College will be stored in line with the College's retention policy.

Data will be processed on the following lawful bases as applicable:

- in the vital interests of yourself or another person;
- where necessary for the performance of a task carried out in the public interest
- legal obligation
- where necessary in the interest of public health

- where necessary to perform the contract we have entered into with you.
- in the College's legitimate interest unless over-riden by your data protection rights and freedoms
- consent (for participants in alumni events that will subsequently be made public)

## Sharing your personal data

### **Medical or welfare data:**

It is possible that the new data above, or data already held by the College, may need to be shared with medical and public authorities, emergency services, or with other concerned parties. Data will be shared in a necessary and proportionate way and, where possible, will be anonymised. Further information on the ways that Wadham College shares and protects your data is provided in the main College [Privacy Notice](#).

### **Video conferencing data**

With the exception of certain specific events which are publicly available, video conferencing data collected by the College will not be shared with third parties. Any event given public distribution will require a registration process. Participants will be fully informed before registering and will have the option of turning off their camera and muting their microphone if they wish to take part without being recorded.

Some account and system data will be collected by the video conferencing service providers as noted above.

## How long we keep your data

We will only process the data above for as long as is necessary for the purpose for which it was collected, unless there is a lawful reason for this to be retained. Where we do not need to continue to process your personal data, it will be securely destroyed.

As mentioned above, recordings may exist which have been made on a student's own device and which they should delete on completion of their studies in accordance with University policy. Please contact the Academic Office or the relevant tutor if you have any questions about this.

## Your legal rights over your data

Your legal rights over your data are set out in full in the main [Wadham College Privacy notice](#), together with guidance on how you can exercise these rights. Please email the College's Data Protection Officer [data.protection@wadham.ox.ac.uk](mailto:data.protection@wadham.ox.ac.uk) if you have any queries.

Further information on data processing during the coronavirus pandemic is available from the Information Commissioner's Office.

<https://ico.org.uk/global/data-protection-and-coronavirus-information-hub/>

## Contact details

If you have any questions on the above information or other queries about your data, please contact the Academic Administrator. Email: [admin@wadham.ox.ac.uk](mailto:admin@wadham.ox.ac.uk); Tel: (01865) 277946