



Wadham College

Privacy Notice: Website and Cookies

Contents

1. About this privacy policy	2
2. Further information.....	2
3. Wadham College Contact Details.....	3
4. What is your personal data and how does the law regulate our use of it?	3
5. Data that we hold about you and how we use it	3
6. The lawful basis on which we process your data.....	4
7. How we share your data	5
8. Automated decision-making	6
9. How long we keep your data.....	6
10. Future changes to this privacy notice	7
11. Privacy notice revision history	7
12. Cookies used by Wadham College on our website	8
13. Changes to our cookie statement	9
14. Cookie statement version control.....	9

1. About this privacy policy

This notice explains what personal data Wadham College (“us” or “we”) gather and hold about visitors to our website (“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. If you access other websites, include those linked to on our site, you will need to consult the appropriate information on other sites for information on their policies and or statements.

For the parts of your personal data that you supply to us to us, this notice also explains the basis on which you 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.

There are some instances where 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.

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.

2. Further information

Wadham College has also published a [separate privacy notice](#) which covers data processing across the College. This privacy notice has links to detailed information for the specific groups and activities listed below. To the extent that you complete a web form on our site, which asks you to give us certain information voluntarily (such as your name, contact information, email addresses or phone numbers) for a specific purpose, you may need to consult another of our notices to see how that data will be handled. For example, if you use a web form to register to attend a College event, you should also consult the conferences and events [further information](#). To obtain a full picture of how your data is treated, it is important that you read this privacy notice together with any other applicable privacy notices on the [College’s GDPR webpage](#):

Students and applicants

- Outreach, potential students and applicants
- Current students

Staff and applicants

- Applicants for academic or non-academic roles at Wadham
- Current and former academic and non-academic staff and others who have an association with the College

Other operational areas of the College

- Financial, commercial and related administration (records relating to financial administration for members of the College but also suppliers/contractors, property transactions, and other accounting purposes)
- Conferences and events
- Security, maintenance and health and safety (including how we use CCTV)
- IT systems (including how we monitor internet and email usage)
- College Archives

A separate privacy notice for our alumni and donors (including what financial information we hold about our alumni and how we use it when considering fundraising initiatives) is available [here](#).

3. Wadham College Contact Details

If at any point you have questions about our privacy notice, or how we are using your data, please get in touch with us using the contact details below:

Website and Communications Officer, Wadham College, Parks Road, Oxford OX1 3PN

Email: comms@wadham.ox.ac.uk; Tel: 01865 87453

Data Protection Officer, Wadham College, Parks Road, Oxford OX1 3PN

Email: data.protection@wadham.ox.ac.uk; Tel: 01865 277900.

4. 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”.

Data protection law requires Wadham College (“us” or “we”), as data controller for your data:

- 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.

5. Data that we hold about you and how we use it

Whenever you use a website, mobile application or other Internet service, certain information is created and recorded automatically. The same is true for our website(s), being those with URLs starting www.wadham.ox.ac.uk.

In addition to the data we gather via web forms placed on our site (the handling of which will be governed by the relevant data protection notice covering the circumstances and context), we collect and generate a variety of data via our website(s).

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

- Log data: Whenever you use our website, our servers automatically record information (“log data”) regarding that access, including:
 - Any data sent by your browser or mobile app to enable you to access the site.
 - Location data of users (if provided by the connecting device).
 - Internet Protocol (IP) address of the connecting device or other unique device identifiers.
 - Browser type and setting for the connecting device.
 - The date and time of access.
 - Details of any attempts to log on to closed systems.
 - Crash data.

- Cookie data: We may use “cookies” (small text files sent by your computer each time you visit our website, unique to your visit or your browser) or similar technologies to record additional information. Our cookies record information including:
 - Language preferences.
 - Contents of online ‘shopping baskets’ (where relevant).

For further information on the cookies we use and the data each collects, please see our [Cookie notice](#).

Most data collected is statistical data about our users' browsing actions and patterns, and does not identify any individual. However, there may be occasions where browsing patterns are connected to IP addresses or location data such that the data as a whole is personal data.

Whether we collect some of the above information often depends on your device type and settings. To learn more about what information your device makes available to us, please also check the policies of your device manufacturer or software provider.

6. 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).

In most circumstances, we require your consent to place cookies on your device(s). When you access our website you are notified that we use cookies, and continued use of the site following that notification is taken as consent to the use of cookies.

If you would prefer that we do not use cookies, you should adjust your browser settings to reject cookie use. Your operating system may allow you to set your preferences in a variety of ways, including a “Do Not Track” setting. If you enable the setting, we will not track your activity on our site.

Where we use cookies for site security, or to ensure the proper functioning of the site (for example via the use of load-bearing cookies), we do not require your consent to the use of these cookies. We have a legitimate interest in their use and we process all data, as collected by those cookies, on that basis.

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

The data that we collect via our website in the course of your accessing it, is provided by you on a voluntary basis. If you elect to adjust your browser settings to reject cookies, it may affect your experience in using the site, in the event that any blocked cookies support functionality.

Other source of your data

Apart from the data that you provide to us, we may also receive data about you from other sources:

- We may get information about you and your activity outside Wadham College from other third parties we work with. For example:
 - The University of Oxford
 - Google Analytics shares information with the websites or apps where it runs to provide statistics. We also receive this information, which may include information such as whether clicks on other sites led to visits to our site. For more information about Google Analytics see <http://www.google.com/analytics/>.

7. How we share your data

We do not, and 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.

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.

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

Organisation	Why?
Other Colleges and/or PPH's within the University of Oxford, University offices and/or departments	Data from cookies may be shared in pursuit of our legitimate interest in maintaining the proper function and security of our website, or where the other party has a legitimate interest in receiving the data for similar purposes. Data may also be shared in an anonymized and/or statistical format.
Legal advisers and auditors	To support our legal and financial obligations and objectives.
Third party service providers	To facilitate activities of Wadham College. Any transfer will be subject to an appropriate, formal agreement between Wadham College 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 (EU)

Although most of the data we collect, store and process stays within the UK, some information may be transferred to countries outside the European Union (EU). The law provides various further safeguards in such cases.

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.

Otherwise, we may transfer your data outside the European Union, but only for lawful purposes 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.

8. 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.

9. 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, regulatory, disciplinary or reporting requirements.

The majority of website data, with the exception of that held in the public domain on the website with the permission of the individuals concerned, is not held in a personally identifiable form more than 2 years.

Please note that we may keep anonymized statistical data indefinitely, but you cannot be identified from such data.

We adopt data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored.

Your legal rights over your data

Subject to certain conditions and exception 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 **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**. 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 Head of Website and Communications or the Data Protection Officer (see contact details under section 2).

Further guidance on your rights is available from the Information Commissioner’s Office (<https://ico.org.uk/>). Please get in touch with the Head of Website and Communications or the College’s Data Protection Officer if you are considering how or whether to exercise your rights. Some of your 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.

You have the right to complain to the UK’s supervisory office for data protection, the Information Commissioner’s Office at <https://ico.org.uk/concerns/> if you believe that your data has been processed unlawfully.

10. 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 Wadham 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 exercise your rights, if appropriate, before the change comes into effect. We will normally notify you of the change by email or via a notice on our website.

You can access past versions of our privacy notices [here](#).

11. Privacy notice revision history

Version	Date	Changes & Approvals
0.1	22 May 2018	Draft for Review
0.2	24 May 2018	Comments from GDPR Advisor
0.3	24 May 2018	Comments from Head of Website & Communications
0.4	29 May 2018	Comments from Head of Website & Communications
0.5	29 May 2018	Comments from GDPR Advisor
0.6	29 May 2018	Comments from Head of Website & Communications
0.7	29 May 2018	Formatting changes for circulation
1.0	29 May 2018	Approved for publication

12. Cookies used by Wadham College on our website

All of our web pages use “cookies”. Cookies are small text files that are placed on your computer by the websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Different types of cookies have different purposes and operate for different amounts of time.

Session cookies are stored in temporary files on your device and are erased from your device when you close your browser. Session cookies allow websites to link the actions of a website visitor during a single browser session, so that any page changes or selections are remembered as you move from page to page. For example, session cookies will make sure items you put into virtual ‘shopping baskets’ are transferred to ‘checkout’ or keep you logged in as you move within sections of a website.

Persistent cookies are stored on your device between browser sessions, either for a long term or time-limited period. They are only deleted when they either ‘expire’ or when you or your browser delete cookies from your device. Persistent cookies are used so that a website ‘remembers’ inputs and settings, including recalling log on data so that you do not have to log in again when you next visit. Persistent cookies may also recall which areas of a website interested you, in order to help you access those areas more easily in future. They may also be used to collect data about your interests, choices and other organisations and websites that you visit, in order to create a profile enabling marketing materials to be more appropriately targeted.

Third party cookies are cookies that are set by a domain other than the one being visited by the user. For details of any third party cookies we include in our domain, please consult the table below.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

Cookie	Duration	Purpose
Cookie preference (cookieaccept)	Session	This cookie is used to remember a user's acknowledgement of cookies on the website.
Google Analytics _utma _utmb _utmc _utmz	Two years Session Cookie Not set Six months	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. Click here for an overview of privacy at Google
YouTube cookies		We embed videos from our official YouTube channel using YouTube's privacy-enhanced mode. This mode may set cookies on your computer once you click on the YouTube video player, but YouTube will not store personally-identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode. Read more at YouTube's embedding videos information page .
Localisation	Session	This is used by the website content management systems to keep track of the local time zone.

Cookie	Duration	Purpose
Language	Session	This is used by the website content management systems to know the language of the website.
Mode	Session	This is used by the CMS for reference. It helps identify if the website user is anonymous or logged in (for editing).
Siteld	Session	This is used by the CMS for reference of the site identifier. It helps manage users across multiple domains for the same client (main site, microsite, mobile site).
NID PREF khcookie	Session	This is a third party cookie used by Google for tracking the number of people that are using Google's maps application. Google's maps are used on the contact us and location page.

To opt out of being tracked by Google Analytics across all websites visit

<http://tools.google.com/dlpage/gaoptout>.

13. Changes to our cookie statement

Any changes we may make to our Cookie Statement in the future will be posted on this page. You can access past versions of our privacy notices [here](#).

14. Cookie statement version control

Version	Date	Changes & Approvals
0.1	22 May 2018	Draft for Discussion
0.2	24 May 2018	Comments from GDPR Advisor
0.3	24 May 2018	Comments from Head of Website & Communications
0.4	29 May 2018	Comments from Head of Website & Communications
0.5	29 May 2018	Comments from GDPR Advisor
0.6	29 May 2018	Comments from Head of Website & Communications
0.7	29 May 2018	Formatting changes for circulation
1.0	29 May 2018	Approved for publication