Privacy Notice – Students and Applicants

INTRODUCTION

Balliol College respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

You can download a pdf version of the policy here [https://www.balliol.ox.ac.uk/privacy-policy]. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice sets out how Balliol College collects and processes your personal data.

It is important that you read this privacy notice so that you are fully aware of how and why we are using your personal data.

Balliol College must:

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

CONTROLLER

Balliol College is the controller and responsible for your personal data (referred to as Balliol College, "we", "us" or "our" in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing compliance with the data protection legislation. If you have any questions about this privacy notice or wish to exercise any of your rights, please contact the DPO using the details set out below.

CONTACT DETAILS

Our full details are:

Full name of legal entity:	The Master and Scholars of Balliol College, in the University of Oxford, commonly called Balliol College
Name of DPO:	Service outsourced to Moore ClearComm
Email address:	DataProtection@balliol.ox.ac.uk
Postal address:	Balliol College, Oxford, OX1 3BJ

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues @(*www.ico.org.uk*). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated in May 2026 and historic versions can be obtained by contacting us. We may need to update this notice from time to time. If the change is material, we will notify you of the change by contacting you at the details you have provided to us in your last correspondence**.**

It is important that the personal data we hold about you is accurate and current. We may ask you to confirm updates to your personal data from time to time but please keep us informed if your personal data changes during your relationship with us in the meantime. Please inform the college of any changes in your data at the following email address: dataprotection@balliol.ox.ac.uk.

THE DATA WE COLLECT ABOUT YOU

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may process the following types of personal data:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender and photographs, including CCTV images.
- **Contact Data** includes postal address, email address and telephone numbers.
- **Professional Data** includes academic qualifications and achievements, references, profession, job title, employer and professional history of the same.
- **Welfare Data** could include grievance and disciplinary information, pastoral care records, information relating to criminal convictions and allegations of criminal activity, medical records and information including dietary requirements and religious information.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of transactions you have entered with us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password to any Balliol College online service, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not personal data as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Professional Data to calculate the percentage of students who go into a sector or industry.

We may collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We may also collect information about criminal convictions and offences in some circumstances. We have an Appropriate Policy Document in place which sets out safeguards which we are required by law to maintain when processing such data.

If you do not provide personal data when we require it under the terms of a contract we have with you or where we legally require it, we may not be able to perform the contract we have or are trying to enter into with you (for example, to enrol you if you are a student or allow you access to our facilities such as the archive or library). We will notify you if this is the case at the time.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect personal data from and about you including when you:

- **Direct interactions.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
- enrol with us;
- make a donation to Balliol College;
- request access to our library or archive;
- keep in touch with our Development Office;
- apply for a grant or bursary;
- make a payment to us for events or services; or
- give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, [server logs] and other similar technologies. Please see our cookie policy. We also use CCTV on the College premises for security purposes.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below
    - **(a)** Technical Data from the following parties:
    - **(b)** analytics providers [such as Google based outside the UK/EEA]; and
    - **(c)** search information providers such as Google based [inside **OR** outside] the UK/EEA].
    - **(d)** Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
    - **(e)** Identity, Professional, Contact, Technical, Usage and Profile Data from the University of Oxford as submitted by way of applications to Balliol College,

administration of the Bodleian Libraries and any other system operated by the University of Oxford which Balliol College has access to.

(f) Professional Data from your previous educational establishments if they provide references to the College. We also review the school that was attended for sixth form.

(g) Identity and Contact Data from members of Balliol College, family members, friends, visitors to Balliol College and other contacts who may provide us with information about you.

(h) Identity and Contact Data from publicly availably sources such as Companies House and the Electoral Register.

- Identity and Transaction data from Balliol College Junior Common Room, Balliol College Middle Common Room, Balliol College societies and clubs.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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 we need to comply with a legal or regulatory obligation.

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

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message (or in relation to certain special categories of (sensitive) personal data). You have the right to withdraw consent at any time by *Contacting us*.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We will use your personal data for the following purposes:-

- To enrol you as a student;
- To deliver teaching services to you;
- To provide you with accommodation and catering;
- To support you by protecting your health, safety and welfare while you are a student with us;
- To manage payments, fees and charges and collect/recover money owed to us;
- To use data analytics to improve our website, services, marketing and student relationships and experiences;
- To provide references;
- The ongoing management of our relationship with you including providing updated terms, policies and procedures when necessary;

- To produce evaluative and analytical reports relating to our student body for diversity-related purposes;
- To refund battels or reimburse expenses if required.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please *Contact us* if you need details about the specific legal ground we are relying on to process your personal data.

SHARING PERSONAL DATA

We do not sell your personal data to third party organisations. We will only share your personal data with third parties where we are allowed or required to do so by law. Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulations, to investigate an alleged crime, or to establish, exercise or defend legal rights. Examples of who we may share your personal data with will include law enforcement and other UK agencies in relation to the prevention and detection of crime or safeguarding national security. We may also share with regulatory bodies if necessary. Any disclosures the College makes will be in accordance with data protection laws and your rights will always be considered.

We may contract with data processors to process personal data on our behalf. We require any processors we use to respect the security of your personal data and to treat it in accordance with the law. We do not allow data processors to use your personal data for their own purposes and we only permit them to process your personal data for specified purposes and in accordance with our instructions. Data processors who process your data on our behalf are subject to contracts under which their processing activities are managed. Where your personal data is shared with data processors, we will only share the minimum amount of information necessary to fulfil the purpose.

We use data processors for:

- Provision of financial accounting software, maintaining and managing our financial records;
- Document destruction services;
- Debt management/recovery.

We may also share personal data as follows:

- With the University of Oxford who provides IT services and who we work with jointly;
- We may share welfare/health data with the NHS via EMIS (NHS healthcare software) in relation to individuals who are registered with a local GP;
- Third parties providing banking, debt management/recovery, insurance and payment services;
- Personal data may be sent to third party financial institutions outside the UK where those bank details have been provided to Balliol College in relation to refunds or reimbursements

LEGAL BASIS

We rely on the following legal bases to process your personal data:

- Performance of a contract – this is the student contract and which covers:

- Enrolment
- Teaching services
- Providing you with accommodation
- Catering services
- Health/safety and welfare
- Management of payment of fees and charges, reimbursement of battels or expenses
- Managing our relationship with you including keeping you abreast of updates to terms, policies and procedures

- We rely on 'legitimate interests' in some circumstances. This is when the processing is necessary for our (or a third party's) legitimate interests and we ensure that your rights and freedoms are not overridden by this processing:
  - Collection and recovery of any monies owed to us and/or University of Oxford
  - Ensuring the health and safety of staff, visitors and students
  - Use of data analytics to improve our website, services, marketing, student relationships and experiences

- We rely on your consent to process personal data in certain circumstances. You can withdraw your consent at any time by contacting us at dataprotection@new.ox.ac.uk:
  - Provision of references
  - Marketing

- We may rely on Recognised Legitimate Interests if we are processing for the prevention and detection of crime or safeguarding.
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- We may also rely on 'public task' if we need to process when it is necessary and in the public interest.

INTERNATIONAL TRANSFERS

It may be necessary, in some cases, to transfer personal data out of the UK.

If we need to transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK Government.
- Where we use certain service providers, we may use specific contract clauses approved by the European Commission (and supplemented with the UK Addendum) or, alternatively, an International Data Transfer Agreement which give personal data the same protection it has in the UK. Europe.
- We may in some cases rely on your consent to transfer personal data out of the UK if appropriate.

Please *Contact us* if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

DATA SECURITY

We have in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the UK Regulator, the Information Commissioner where we are legally required to do so.

DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request by contacting us.

By law we may have to keep some basic information (including Contact, Identity, Financial and Transaction Data) for pre-determined periods such as for tax purposes.

In some circumstances we may anonymise your personal data (so that you can no longer be identified) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

You have rights under the UK GDPR in relation to your personal data:

- The right to request access to your personal data
- The right to be informed about the processing of your personal data
- The right to request correction of your personal data
- The right to request erasure of your personal data
- The right to object to processing of your personal data
- The right to request restriction of processing your personal data
- The right to request transfer of your personal data
- The right to withdraw consent

- The right to object to any direct marketing
- The right to object to any automated decision-making

Information about these legal rights can be found in the Glossary. If you wish to exercise any of the rights set out above, please *Contact us*. Some of these rights are not absolute, but we will advise you if that is the case or if we are going to apply an exemption.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances and we will notify you if this is the case.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising:

PROMOTIONAL OFFERS FROM US

We would like to contact you to let you know about events, services and activities which might be of interest to you.

We can only do this with your consent and you will need to provide this before we can start sending you promotional or marketing material. You can withdraw your consent at any time by opting out of receiving communications from us.

THIRD-PARTY MARKETING

We will get your consent before we share your personal data with any organisation outside Balliol College for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by *Contacting us*.

When you opt-out of receiving marketing messages you will no longer receive these messages. However, we will still process your personal data for non-marketing purposes such as providing services or accessing our facilities. in relation to your use of services or access to our facilities.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see Balliol College's cookie policy.

THIRD-PARTY LINKS AND SOCIAL MEDIA

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. You can find out further information about this in our Cookie Policy.

We and organisations connected with us (such as the JCR and MCR and other college associations) have a social media presence for the purpose of engaging with our students, alumni and visitors.

If you enable such connections or choose to communicate your personal data to us via third-party websites, third party email providers or social media, please remember that we do not control these third-party systems and are not responsible for their privacy statements. When you leave our website or interact with us on social media, we encourage you to read the privacy notice of every website of forum that you visit or use.

COMPLAINTS

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to: dataprotection@balliol.ox.ac.uk. We will investigate and respond to any complaints we receive.

You also have the right to lodge a complaint with the Information Commissioner's Office ("ICO") once we have had the opportunity to resolve your complaint. For further information on your rights and how to complain to the ICO, please refer to the ICO website *ICO Make a Complaint*

DATA CONTROLLER AND CONTACT INFORMATION

If you have any questions about this 'Privacy Notice' or how and why we process personal data, please contact us at: dataprotection@balliol.ox.ac.uk

GLOSSARY

YOUR LEGAL RIGHTS

You have the right to:

Request access	to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
Request correction	of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
Request erasure	of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Object to any direct marketing (for example, email marketing or phone calls) by us, and to require us to stop such marketing.

Object to automated decision-making about you which produces legal effects or otherwise significantly affects you.

Updated May 2026