 PRIVACY NOTICE

Finance, Commercial, and Related Administration

This privacy notice, which has been drawn up in consultation with Mills & Reeve LLP, applies to anyone whose personal data is processed by Nuffield College as a supplier/contractor, or in connection with property transactions, for accounting, administrative and similar purposes.

Separate privacy notices covering processing of staff, student and others’ data are available on the College website.¹

A summary of what this notice explains

Nuffield College (“we”; “the College”) is committed to protecting the privacy and security of personal data.

This notice and its accompanying Record of Processing Activities² explains what personal data the College 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.

There are some instances where we process your personal data on the basis of your consent. This notice sets out the categories and purposes we use your data for where your consent is needed.

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;

¹ https://www.nuffield.ox.ac.uk/the-college/policies-and-resources/
² https://www.nuffield.ox.ac.uk/media/3070/ropa-finance-commercial-and-related-administration_v01.pdf
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.

Contact Details

If you need to get in touch with us about your data, please contact:

Finance Department
Nuffield College
New Road
Oxford, OX1 1NF

finance.department@nuffield.ox.ac.uk
+ 44 1865 278522

Or the College’s Data Protection Officer, at the same address:

dpo@nuffield.ox.ac.uk
+ 44 1865 278606

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 the College).

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:
  o 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
  o 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.

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 Record of Processing Activities\(^3\) which sets out in detail 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.

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 or in order to fulfil a contractual obligation. This includes for example where we are required to provide reports to a funding body.

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.

We have prepared a Data Sharing Table\(^4\) which provides more information on the categories of recipients of your data.

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).

We may transfer your data outside the European Union, but only for lawful purposes or in order to fulfil a contractual obligation.

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.

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\(^3\) https://www.nuffield.ox.ac.uk/media/3070/ropa-finance-commercial-and-related-administration_v01.pdf

\(^4\) https://www.nuffield.ox.ac.uk/media/3055/data-sharing-table_v01.pdf
How long we keep your data

The detailed Record of Processing Activities explains how long we will keep your data. Most financial data will be kept for up to seven years from the end of the financial year in which the transaction took place. Basic transaction records – consisting of a name, date, short description of payment, and the amount - which are posted to our financial system may be kept for up to 20 years.

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 Records of Processing Activities.
- 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 us via the contact details set out above.

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5 https://www.nuffield.ox.ac.uk/media/3070/ropa-finance-commercial-and-related-administration_v01.pdf
6 https://www.nuffield.ox.ac.uk/the-college/policies-and-resources/
Further guidance on your rights is available from the Information Commissioner’s Office ([https://ico.org.uk/](https://ico.org.uk/)). You may also wish to contact the College’s Data Protection Officer ([dpo@nuffield.ox.ac.uk](mailto:dpo@nuffield.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 the College’s operations and procedures more efficient. If the change is material, we will endeavour to 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 normally notify you of material change by email.

Past versions of this and other Privacy Notices can be accessed online⁷.

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⁷ [https://www.nuffield.ox.ac.uk/the-college/policies-and-resources/past-privacy-notices-and-ropas/](https://www.nuffield.ox.ac.uk/the-college/policies-and-resources/past-privacy-notices-and-ropas/)