

Opportunity Oxford Privacy Policy

The University of Oxford¹ is committed to protecting the privacy and security of your personal information ('personal data').

Opportunity Oxford is an academic programme coordinated by the University of Oxford's Undergraduate Admissions and Outreach Department.

This privacy policy describes how we collect and use your personal data during and after your participation on Opportunity Oxford, in accordance with the General Data Protection Regulation (GDPR) and related UK data protection legislation.

It should be read in conjunction with the University's Undergraduate Applicant Privacy Policy² and the University's Student Privacy Policy³. It applies to all individuals who will or will have participated on the Opportunity Oxford events run by the University of Oxford.

It is important that you read this policy, together with any other privacy policy we may provide on specific occasions when we are collecting or processing information about you, so that you are aware of how and why we are using the information. We may update this policy at any time.

A. Personal Data

Where we refer in this policy to your 'personal data', we mean any recorded information that is about you and from which you can be identified, whether directly or indirectly. It does not include data where your identity has been removed (anonymous data).

Where we refer to the 'processing' of your personal data, we mean anything that we do with that information, including collection, use, storage, disclosure, deletion or retention.

B. Who Is Using Your Personal Data?

The University of Oxford is the "data controller" for the information that we hold about you as a student or former student. This means that we decide how to use it and are responsible for looking after it in accordance with the GDPR.

We collect your personal data (name, email, telephone, bank details, dietary requirements, and any access or other requirements) in order to manage and carry out the Opportunity Oxford programme.

Access to your student record and other data will be provided to the academic and support staff, including those based in colleges, who need to view it as part of their work in carrying out the purposes set out in Section E. It will also be shared with the third parties described in Section G.

C. The Types Of Data We Hold About You

The information we hold about you may include, but is not limited to those outlined in Section 4 of the Undergraduate Applicant Privacy Policy² and Section D of the Student Privacy Policy³. As part of this, we may process the following "special categories" of more sensitive personal data.

¹ The University's legal title is the Chancellor, Masters and Scholars of the University of Oxford

² Undergraduate Applicant Privacy Policy <https://compliance.admin.ox.ac.uk/privacy-policy-undergraduate-student-applicants>

³ Student Privacy Policy <https://compliance.admin.ox.ac.uk/student-privacy-policy>

We may also contact you to ask for your feedback on aspects of these activities. We collect your personal data (e.g. name, email, telephone, dietary requirements, and any access or other requirements) in order to manage and carry out the programme.

We will retain your data only for as long as we need it to meet our purposes, including any relating to legal, accounting, or reporting requirements. Details of the retention periods for different types of student data are available on the University Compliance ⁴webpages.

We will analyse the data in anonymised form in order to evaluate the effectiveness of our programmes.

D. How The University Obtained Your Data

We collect the vast majority of the information directly from you, through the application process and during online registration. We may also collect additional information from third parties, including colleges, former schools and higher education institutions, and government departments and agencies, or information which is in the public domain. We may also contact you to ask for your feedback on aspects of the Opportunity Oxford programme. We will collect and generate additional information about you throughout the period of your participation on Opportunity Oxford and your studies.

E. How The University Uses Your Data

We will use your data for the purposes as set out in this Privacy Policy, the other Privacy Policies referenced and as set out in the circumstances below where it is necessary for us to process your data. (These circumstances are not mutually exclusive; we may use the same information under more than one heading.)

We use your data for a number of purposes connected with your participation on Opportunity Oxford, including, but not limited, to the provision of:

- teaching and learning, educational purposes, academic supervision and related activities;
- welfare and pastoral support including ensuring the health and safety of students, staff and others;
- funding and financial support;
- support services (such as careers and sport);
- research related administration to support our equality responsibilities, quality assurance and planning processes;
- the administration of University procedures including in relation to discipline, complaints, appeals, academic integrity, fitness to practise, fitness to teach, fitness to study, applications for dispensations, extensions and/or suspension;
- supporting the provision of facilities and services e.g. access to IT facilities, libraries, accommodation etc.; and
- understanding the educational and wider student experience and evaluating the University's projects and activities in relation to admissions, outreach, teaching and learning and the student experience.

Where it is necessary to meet a task in the public interest

As indicated above, we need to process your data for the purpose of teaching and related activities. This may include processing data within the Virtual Learning Environment CANVAS (VLE). Teaching and learning and related activities are tasks that The University of Oxford performs in the public interest in order to fulfil our responsibility as a charity for promoting the advancement of learning in a safe and secure environment. Information processed under this heading includes, but is not limited to, the data referenced in section C.

Where it is necessary to meet our legitimate interests

The University of Oxford is committed to teaching, enabling and enhancing the student learning experience. We need to process your data in order to meet our legitimate interests relating to the administration and delivery of the Opportunity Oxford programme, or the legitimate interests of others. Examples include, but are not limited to, the following:

⁴ University Compliance Retention Schedules <https://compliance.admin.ox.ac.uk/retention-schedules>

- Audio and video recording of online sessions and participants in academic sessions. Online sessions will be recorded unless otherwise stated for the purpose of providing flexible access for all participants on the programme. Where recording is taking place, it will be indicated.
- Safeguarding and welfare of Opportunity Oxford participants.
- Inviting you to take part in surveys or enabling third parties to conduct applicant surveys on our behalf.
- Asking you to provide additional information on your application.
- Facilitating the efficient operation of the Opportunity Oxford programme.

We have considered the privacy risks in relation to processing data of Opportunity Oxford participants, and we have mitigated these risks where possible through the means of an ICO⁵ legitimate interests' assessment.

Where we have your consent

There may be situations where we ask for your consent to process your data e.g. where we ask you to volunteer information about yourself for a survey or where we ask for your permission to share sensitive information.

The University's Opportunity Oxford programme aims to increase opportunities for access for students who, historically, have been underrepresented at the University, and, to monitor and improve the programme, the University collects data (from applicants and students) including information on your racial or ethnic origin, health/disabilities (including any assessments by DAS), previous education, socio-economic background and academic progress at University.

Change of purpose

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

Please note that we may process your data without your knowledge or consent where this is required or permitted by law.

F. Special Category Data And Criminal Conviction Data

Special category data and criminal conviction data require a higher level of protection. The Privacy Policy sources below outline examples of processing activities that we regularly undertake in respect of these types of data. In addition to the activities listed below, it may sometimes be necessary to process this sort of information for exceptional reasons, for example, because it is necessary to protect your vital interests (including in relation to health and safety) or those of another person or for safeguarding purposes. This may include sharing such data with third parties as identified in section H below. In some instances (for example responding to a request from police investigating an alleged criminal offence) this may be necessary even if data has been provided to the University in confidence.

The information we hold about you may include, but is not limited to those outlined in Section 7 of the Undergraduate Applicant Privacy Policy² and Section G of the Student Privacy Policy³.

G. Data Sharing With Third Parties

In order to perform our contractual and other legal responsibilities or purposes, we may, from time to time, and where relevant and necessary, need to share your information with other organisations.

The types of organisation we need to share your information with include those outlined in Section 8 of the Undergraduate Applicant Privacy Policy² and Section H of the Student Privacy Policy³.

⁵ Information Commissioner's Office <https://ico.org.uk/>

Where information is shared with third parties, we will seek to share the minimum amount necessary. For example, we may in appropriate cases share only your student number and not your name (this is known as pseudonymisation).

All third-party service providers that process data on our behalf are required to take appropriate security measures to protect your data in line with our policies. We do not allow them to use your data for their own purposes. We permit them to process your data only for specified purposes and in accordance with our instructions.

H. Transfers of Your Data Overseas

There may be occasions when we transfer your data overseas, for example, if we communicate with you using a cloud-based service provider that operates outside the UK. Such transfers will only take place if applicable under Section I of the Student Privacy Policy³.

I. Data Security

We have put in place measures to protect the security of your information. Details of these measures are available from the University's Information Security website⁶.

Third parties that process data on our behalf will do so only on our instructions and where they have agreed to keep it secure.

J. Retention Period

We will retain your data only for as long as we need it to meet our purposes, including any relating to legal, accounting, or reporting requirements. Details of the retention periods for different types of applicant and student data are available on the University Compliance webpages⁷.

K. Your Rights

Under certain circumstances, by law you have certain rights to your data. These rights are outlined in Section 11 of the Undergraduate Applicant Privacy Policy² and Section L of the Student Privacy Policy³.

L. Keeping Your Data Up-To-Date

After you have submitted your undergraduate application to the University, it is your responsibility to check and ensure that your personal data is kept up-to-date. This is important in enabling us to be certain that the data we hold about you is accurate and current. Please keep us informed of any changes after you submit your application.

M. Changes To This Privacy Policy

We reserve the right to update this privacy policy at any time, and will seek to inform you of substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

The Opportunity Oxford team can be contacted at
opportunityoxford@admin.ox.ac.uk

The University's Undergraduate Applicant Privacy Policy is available at
<https://compliance.admin.ox.ac.uk/privacy-policy-undergraduate-student-applicants>

The University's Student Privacy Policy is available at
<https://compliance.admin.ox.ac.uk/student-privacy-policy>

⁶ University Information Security Policy <https://www.infosec.ox.ac.uk/guidance-policy>

⁷ University Compliance - Retention Schedules <https://compliance.admin.ox.ac.uk/retention-schedules>