# How we use your personal information

## Job applicants and candidates for election to College memberships

This statement explains how Pembroke College ("we" and "our") handles and uses data we collect about applicants ("you" and "your") for jobs, senior memberships and Fellowships. In broad terms, we use your data to manage your application to the College and our subsequent recruitment or election processes.

The controller for your personal data is the is Pembroke College, Cambridge, CB2 1RF. The Data Protection Officer for the College is the Office of Intercollegiate Services Ltd, 12B King's Parade, Cambridge; 01223 768745; college.dpo@ois.cam.ac.uk. OIS Ltd. should be contacted if you have any concerns about how the College is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement. The person within the College otherwise responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data, is the Data Protection Lead (dpo@pem.cam.ac.uk).

The legal basis for processing your personal data is that it is necessary either in order for you to enter into an employment contract with us, or for you to enter into membership of the College, where you will be subject to the College's governing documents.

#### How your data is used by the College

Your data is used by us, in the first instance, solely for the purposes of considering your suitability for employment or election and for us to manage our recruitment processes, including our monitoring of equality and diversity within the College.

If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address given below.

The College holds the following personal data relating to you, in line with the purposes above:

- A\* personal details, including name, contact details (phone, email, postal);
- B\* your application form and associated information submitted by you at that time;
- C other data relating to your recruitment (including references we take up as part of the recruitment process, any pre-employment assessment of you, and any assessment of you at an informal or formal interview);
- D any occupational health assessments and/or medical information you have provided, and related work requirements;
- E\* evidence of your right to work in the UK (e.g. copies of your passport);
- F\* information relating to your age, nationality, gender, ethnicity and disability;
- G any correspondence relating to the outcome of the recruitment process (either successful or unsuccessful).

Those marked with an \* relate to information provided by you. Other data and information is generated by us or, where self-evident, provided by a third party.

For certain posts, we may use the Disclosure and Barring Services (DBS) and Disclosure Scotland to help assess your suitability for certain positions of trust. If this is the case, we will make this clear to you in separate correspondence. Certificate and status check information is only used for this specific purpose, and we comply fully with the DBS code of Practice regarding the correct use, handling, storage, retention and destruction of certificates and certificate information. We recognise that it is a criminal offence to pass this information on to anyone who is not entitled to receive it.

### How we share your personal data

Information is not shared with other third parties without your written consent. Generally, personal data is not shared outside of the European Economic Area.

If you are successful in your application, the data is subsequently held as part of your employment or membership record with us.

If you are unsuccessful in your application, we retain all data and information for no more than twelve months after the closing date of the application process.

In either case, where the post has required a "resident market test" (needed if the post is open to applicants from outside the European Union), the College will retain the application records of any shortlisted candidates for the duration of the sponsored post and twelve months thereafter.

#### Your rights

You have the right: to ask us for access to, rectification or erasure of your data; to restrict processing (pending correction or deletion); and to ask for the transfer of your data electronically to a third party (data portability). Some of these 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.

Failure to provide the information reasonably requested of you may result in an automatic disqualification from the recruitment process.

You retain the right at all times to lodge a complaint about our management of your personal data with the Information Commissioner's Office at https://ico.org.uk/concerns/

Last updated: 25/05/2018 Data Protection Lead

#### <u>ANNEX</u>

We collect and process your personal data, as specified below, for a number of purposes, including:

A. maintaining a record of your academic progress and achievements of the College and the University of Cambridge and elsewhere:

We retain personal data (provided by you or by the University of Cambridge, or created by us), including:

- i) your current name and any previous names you have had;
- ii) unique personal identifiers (e.g. student number, CRSID, date of birth, photograph);
- iii) your current and previous contact details;
- iv) your application details, our assessment of your application and the details of any offer(s) of study we have made;
- v) records of your academic provision from the College (including supervisions, College examinations and other academic support);
- vi) matriculation and graduation details and records of your academic qualifications (including those prior to becoming a member of the College);
- vii) other details of your academic progress or achievement (e.g. College or University awards or prizes);
- B. retaining a record of your academic, career or other life achievements in order to promote and improve the reputation of the College and help you to network with other College members effectively:

We retain personal data (provided by you), including:

- i) details of your achievements since you completed your course(s) of study;
- ii) membership of College and external clubs and societies (including alumni groups);
- iii) your previous and current employment status (including retirement), including job title, sector, income and work contact details, dates of employment.

When you provide this information, we will assume (unless you notify us otherwise) that we can promote these achievements in our public literature, and can use this information for other purposes outlined in this statement. We may supplement information from other public sources that we consider to be reliable (e.g. your public social media profile(s), Queen's Honours List, Companies House, high profile news reports or articles) and may check their accuracy with your from time to time.

C. engaging you in College and University events that we believe will be of interest to you, including alumni and open events, volunteering opportunities, and other ways you can contribute to the life of the College:

We retain personal data (provided by you or by the University of Cambridge, or created by us), including:

- i) known relationships with other members (past or present) of the University of Cambridge or any of the Colleges;
- ii) your previous attendance at College or University events;
- iii) information about your areas of personal interest;
- iv) personal data relating to your attendance at events and your personal preferences (e.g. dietary or accommodation requirements or requests);
- v) records of any communications (verbal or written) we have had with you, including the purpose and outcome of those communications.

When you provide this information, we will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement. We may supplement information from other public sources that we consider to be reliable (e.g. your public social media profile(s), University publications, high profile news reports or articles) and may check their accuracy with your from time to time.

D. providing you with information about the development of the College, including major initiatives and programmes relating to either the academic endeavour or the provision of services and facilities to members and the wider public:

We retain personal data (provided by you or by the University of Cambridge, or created by us), including:

- i) any communication preferences confirmed by you;
- ii) ways in which you have supported the College.

By providing us with email addresses and telephone numbers, we have taken this to be consent to use those channels to contact you for this and other purposes outlined in this statement, unless you have outlined to us your preferred communication channels. When you provide this information, we will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement.

E. encouraging you to make a financial contribution to the College and/or the University, and processing any such contributions:

The College's income consists of gifts and benefactions, income derived from prudent investment of any endowment and student fees. We value any financial contribution from our members and, accordingly, retain personal data (provided by you or by the University of Cambridge, or created by us), including:

- i) the purposes and amounts of any donations or other support previously provided to the University or the College by you;
- ii) the method(s) of payments used and related payment references;
- iii) your bank details (for processing direct debit or other financial transactions);
- iv) your tax status and Gift Aid declaration.

Some of this financial information needs to be retained for statutory purposes for a number of years (e.g. Gift Aid, anti-fraud and accounting matters). When you provide this information, we will assume (unless you notify us otherwise) that we can use this information for other purposes outlined in this statement.

F. assessing the likelihood that you will, now or in the future, make a financial contribution (gift) to the College:

The College undertakes research to determine your capacity to provide financial support. This results in us creating personal data including:

- i) your estimated income or asset worth (where this is not provided by you);
- ii) your potential capacity to make a gift, including our internal classification of you as a major gift prospect which is determined by a combination of *your giving history, your attendance at College and University events, and your other interactions with the College since you graduated, including any positive or negative indications from you about your capacity or willingness to give to the College;*
- iii) gifts you have made to other charitable organisations?

Our research includes incorporating information from public sources that we consider to be reliable (e.g. your public social media profile(s), Queen's Honours List, Companies House, high profile news reports or articles). In using these sources, we have considered the potential intrusion of your privacy. In most cases, our assessment above aims to exclude you from unwelcome or inappropriate approaches so as not to compromise your ongoing relationship with us.

We may use external contractors or consultants to assist us in this research. Where we do so, any sharing of your personal data is on the strict understanding that they may not repurpose it, or pass it on to other third parties. We do not sell your personal data under any circumstances.

G. promoting third party services we believe will be of interest to you:

We retain personal data (provided by you), including:

i) any preferences to be excluded from such services.

If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us.