

# How we use your personal information

## *IP Vacation Students*

This statement explains how Pembroke College (“the College”, “we” and “our”) handles and uses information we collect about those applicants we make an offer to study on one of our international vacation programmes, and students once they attend one of these programmes (“you” and “your”). In broad terms, we use your personal information to manage the ongoing relationship between the College and you as part of our lifelong community of scholars. This includes guiding and supporting your academic studies, maintaining and reviewing your academic progress and pastoral welfare, reviewing your financial commitments to the College and (if you live in College accommodation) managing our relationship with you as a resident.

When changes are made to this statement, we will publish the updated version on our website and notify you by other communications channels as we deem appropriate or necessary.

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](mailto:dpo@pem.cam.ac.uk)).

The normal legal basis for processing your personal information is that it is necessary in the performance of one or more contracts with us (including preparing to become a student, the expectations on both sides during your course of studies and any related accommodation contract). We have commitments to other external bodies (particularly the University of Cambridge and your home institution and/or study abroad provider) as part of those contracts, and we outline below (see “*How we share your personal information*”) how and when we ordinarily will share your personal information. For some specific purposes, we may rely on another legal basis, including where we are required for compliance with a legal obligation (e.g. financial records, equal opportunities monitoring), or where we believe it is in our legitimate interest to do so (e.g. to enable your access to external services). You may ask us for further information on these matters at any time if you have specific concerns.

### **How your information is used by the College**

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

- A. maintaining your personal details, including ensuring effective communications with you;
- B. maintaining a formal record of your academic progress and achievements at the College, the University of Cambridge and elsewhere;
- C. maintaining a formal record of your other engagements with and achievements at the College, the University of Cambridge and elsewhere
- D. maintaining a record, where appropriate, of any particular personal needs you require to participate fully in College and University life (including any support needs that are, or have been, provided by the College or the University during your course of studies), as well as information about your general health and wellbeing;

- E. maintaining financial records relating to your studies, your funding and other financial support arrangements;
- F. provision of references to third parties;
- G. maintaining a record of your behaviour and in particular where there has been concerns or complaints raised about you;
- H. maintaining a record of any complaints you make to the College and their outcomes;
- I. maintaining data to enable the College and the University to produce statistics and research for internal and statutory reporting purposes.

Further details are provided in the Annex. If you have concerns or queries about any of these purposes, please contact us at the address given below, or speak to College Registrar.

We also operate CCTV on our sites, which will capture footage. Our CCTV policy can be viewed at <http://www.pem.cam.ac.uk/the-college/legal-information/data-protection/>.

Please note that if you engage with us for any other purpose (e.g. you work for us, or volunteer for us), there are additional data protection statements that you will be provided with for those other purposes, usually at the first point of engagement.

### **How long we keep your information for**

The Annex outlines specific retention periods for certain categories of information: most of these are determined by legal requirements relating to that specific information.

Where no specific retention period is noted, at the end of your programme of study, the College reduces your personal information to a subset of information so that the College can retain a sufficient record of your academic achievements for references and other related purposes, and your time at the College. The archived record would retain:

- your initial application to the College (if applicable) and all related paperwork with you coming into residence and taking up your place on one of Pembroke's international programmes
- your transcript
- your supervision reports (if applicable)
- grant reports

Finally, we strongly encourage all of our students to remain in touch with the College after they leave and, for that reason, we transfer a subset of this information to our alumni office. You are encouraged to read our separate statement about personal information for alumni, which covers your ongoing lifelong membership of the College at <http://www.pem.cam.ac.uk/the-college/legal-information/data-protection/>.

### **How we share your personal information**

#### *Within the College*

We share on a need-to-know basis information with relevant people/departments within the College: to allow efficient day to day support for your academic, financial, accommodation and pastoral life in the College. This is considered necessary for the College to operate smoothly but you can request a greater level of privacy by contacting the College Registrar or Senior Tutor.

The College also takes photographs and videos of its students, either individually and/or as a group. These are widely used within the College and may be on public display, used on social media, printed material or College websites.

Otherwise, the College restricts the sharing of your personal information within the College in line with its data protection policy <http://www.pem.cam.ac.uk/the-college/legal-information/data-protection/>.

#### *With the University*

The personal information shared with the University will include only that which is necessary for you to undertake and complete your studies and your examinations, and in addition will include any information necessary for the College to fulfill its obligations and agreements with the University about the shared University community (including sufficient information for the University to record and collate instances of student behaviour or complaints across all of the Colleges and the University). Where possible, the College will notify you of its intention to share such data in advance.

The University is a separate legal entity to the College and has its own statement about your personal information and its procedures, which you can view at: <https://www.information-compliance.admin.cam.ac.uk/data-protection/student-data>. It in turn shares information with the affiliated student unions and a number of other bodies for statutory and other purposes.

#### *With other organisations*

The College routinely shares information with, and receives information from, where appropriate:

- your home institution and/or study abroad provider (including your name, email address, application materials, application or programme registration status, grades and transcripts, financial status, information relating to any disciplinary issues, and information relating to any special arrangements required for you to participate in the programme);
- the Cambridge City Council and other local authorities (to provide evidence of any rights to or exemptions from local services and taxes, including electoral registration and council tax);
- your funding providers or sponsors, as agreed with them and/or you, including the Student Loans Company.

We may also be subject to a legal requirement (with or without your consent) to share your personal information with some government agencies under special circumstances (e.g. relating to crime or health and safety), such as the police or security services or other statutory authorities with investigatory powers. Where possible, the College will notify you of its intention to share such information in advance.

We will normally provide confirmation of your qualifications and other academic references to a prospective employer or financial sponsor if it is reasonably clear that it would be in your interests to do so, and we have made reasonable checks to ensure the information is being requested for that purpose.

We may also provide personal information to agencies and trusted advisers in order to receive professional advice or guidance in relation to a number of matters (examples of such advice include legal and audit services, fee status verification services, intercollegiate agreement services) or to provide services to you through a third party on our behalf. In such circumstances, data sharing agreements are in place to ensure your personal information is not retained by them for longer than necessary or otherwise shared more widely.

### *Publication of your personal information*

We would not normally otherwise make your personal information publicly available without your consent.

We would encourage you to be careful when sharing personal information about other students in public social media sites and other similar environments.

### **Your rights**

You have the right: to ask us for access to, rectification or erasure of your personal information; to restrict processing (pending correction or deletion); to object to communications; and to ask for the transfer of your personal information 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.

If you have questions or concerns about your personal information, or how it used, please speak to the relevant College staff in the first instance.

If you remain unhappy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<https://ico.org.uk/>).

*Last updated: 19/05/2023  
College Data Protection Lead*

## **Annex**

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

**A. maintaining your personal details, including ensuring effective communications with you;**

We retain personal information (provided by you, or by your home institution and/or study abroad provider 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) next-of-kin or emergency contacts.

We will assume that you have obtained permission from your next-of-kin or emergency contact for us to hold their information for that purpose.

**B. maintaining a formal record of your academic progress and achievements at the College, the University of Cambridge and elsewhere:**

We retain personal information (provided by you, or by your home institution and/or study abroad provider or by the University of Cambridge,, or created by us), including:

- i) your application details, our assessment of your application and the details of any offer(s) of study we have made;
- ii) records of your academic provision from the College (including supervisions, College examinations and other academic support);
- iii) registration details and records of your academic qualifications (including those prior to attending one of our international programmes);
- iv) other details of your academic progress or achievements (e.g. College or University awards or prizes).

Where an award or prize is provided by an external sponsor, we will normally share details about you and your academic performance with them and publish your achievements in the annual Pembroke College Cambridge Society Gazette.

**C. maintaining a formal record of your other engagements with and achievements at the College, the University of Cambridge and elsewhere:**

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

- i) records of your membership of College committees, the Junior Parlour (JP), Graduate Parlour (GP) and College clubs and societies;
- ii) awards, prizes and achievements in College or University-related activities (e.g music, arts, sports etc.).

**D. maintaining a record, where appropriate, of any particular personal needs you require to participate fully in our international programmes (including any support needs that are, or have been, provided by the College or the University during your course of studies), as well as information about your general health and wellbeing:**

We retain personal information (provided by you, or by your home institution and/or study abroad provider or by the University of Cambridge, or created by us), including:

- i) details of any disability, illness, and any consequent learning support, social support or other support needs;

- ii) details of any serious risks affecting you (e.g. severe allergies);
- iii) arrangements agreed with you to manage your use of College and University facilities (e.g. computing services, sports facilities, libraries, accommodation, learning spaces), including any special requirements that may be linked to your health or religious beliefs;
- iv) other information to support your health, safety and wellbeing.

We may also retain copies of statements from professional medical advisers, provided either by you or directly to us.

All personal information will be managed in line with our confidentiality policy. We recognise that much of the personal information outlined above is of a sensitive nature and requires a high level of discretion. Wherever possible, we will discuss and agree with you in advance with whom and when we share this information, but reserve the right to disclose information to others in matters relating to significant risks to your health and safety or the health and safety of others.

This information is normally retained until one year after you complete your studies.

Please note that where you are referred to services not offered directly by the College (e.g. the University Counselling Centre and the University's Disability Resource Centre), these support services will have their own data protection statement (or privacy notice) and we advise you pay close attention to these.

#### E. maintaining financial records relating to your studies, your funding and other financial support arrangements:

We retain personal information (provided by you, or by your home institution and/or study abroad provider or by the University of Cambridge, or created by us), including:

- i) records of your sources of funding support and tuition fee liabilities and, where relevant, records of your accommodation liabilities and other related charges (e.g. [kitchen fixed charge]), as well as what monies are to be, and have been, collected by the College on behalf of itself and the University;
- ii) records of any financial support agreed by the University and/or the College (including Cambridge Bursaries, other studentships or awards, additional discretionary funding, benefits or waivers approved by the College);
- iii) where you reside in accommodation owned or managed by the College, copies of any accommodation contract(s);
- iv) where appropriate, your banking details in order to conduct financial transactions, and records of such transactions;
- v) records of your College financial account, including balance and transactions;
- vi) copies of any correspondence with you about any of the above matters.

Where this information includes the personal information of others (e.g. parental income evidence), we will assume that you have their permission to provide it to us for our purposes. This information is normally retained until seven years after you complete your studies.

#### F. provision of references to third parties:

In addition to the information above (and particularly your achievements in B and C above), we retain personal information (provided by you or created by us), including:

- i) records of your advisers, including where relevant your Tutor, Director of Studies and other nominated College personnel who provided you with personal support.

G. maintaining a record of your behaviour and in particular where there has been concerns or complaints raised about you:

We retain personal information (provided by you or by others, or created by us), including:

- i) details of any investigations undertaken by the College into your conduct or behaviour (e.g. disciplinary investigations, fitness to study investigations, complaints made against you);

The College has several complaints procedures, relating to different matters, which you are expected to familiarise yourself with and, in all cases, personal information will be managed in line with our confidentiality policy. We recognise that investigations may include information or statements of either a sensitive or disputed nature, and that such records require a high level of confidentiality. Wherever possible, we will discuss and agree with you in advance with whom and when we share this information, but reserve the right to disclose information to others in matters relating to significant risks to your health and safety or the health and safety of others.

This information is normally retained until one year after you complete your studies.

H. maintaining a record of any complaints you make to the College and their outcomes:

We retain personal information (provided by you or by others, or created by us), including:

- i) details of any complaints you have made to the College and their outcomes, where these have been taken through the College complaints procedure.

This information is normally retained until three years after you complete your studies.

I. maintaining data to enable the College and the University to produce statistics and research for internal and statutory reporting purposes.

It is difficult to provide a comprehensive list, but we retain personal information (provided by you), including:

- i) information relating to “equal opportunities” (e.g. nationality, ethnicity, religious and other beliefs, gender, sexuality, age) in order to fulfill legal requirements of the College or the University;
- ii) information relating to known relationships with other members (past or present) of the University of Cambridge or any of the Colleges;
- iii) information relating to your rights to live, work and study in the United Kingdom;
- iv) any criminal record that may affect your status as a student of the University or the College;