

## **Data Protection Policy** **While on the Premises**

### **How we use your personal information**

This statement explains how King's College ("we" and "our") handles and uses certain information about anyone while they are physically present on College properties. This includes visitors (whether staying for a time or just passing through), contractors, suppliers, Catering clients, student applicants and those on School visits, current and applicant staff, Fellows, students and their guests while on the College site. In broad terms, we use your information to manage safely the College properties, and to provide other services requested by you while using the facilities.

The controller for your personal data is King's College, King's Parade, Cambridge, CB2 1ST. The Data Protection Officer for the College is the Office of Intercollegiate Services Ltd (ISL), 64 Bridge Street, Cambridge CB2 1UR; 01223 768745; [college.dpo@ois.cam.ac.uk](mailto:college.dpo@ois.cam.ac.uk). ISL 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 Freedom of Information Officer, [foi@kings.cam.ac.uk](mailto:foi@kings.cam.ac.uk).

### **Legal Basis**

The legal bases for processing your personal information are given below. We will retain your information for the periods stated unless or until you request us to do otherwise.

We collect and process your personal information for the following purposes:

#### **A. Health and Safety (H&S) management**

We process information such as your name, contact details and other information you provide us when we are reporting and investigating accidents, near misses, incidents, and/or crimes. We also process information required for implementation of our H&S policy, including training records. We keep these records for up to 6 years after the last action on the incident. Certain information is required by law (such as the issuing of personal protective equipment). Where a legal obligation does not apply the processing of this information is for our legitimate interests.

#### **B. Closed Circuit Television (CCTV)**

CCTV cameras are in use around the College's properties. They are used to deter and investigate crime and to support the safety of those on the College properties. Information derived from CCTV capture will only be used for security purposes, unless it leads to the discovery of an activity that no employer or site manager could reasonably be expected to ignore, for example, criminal activity, breaches of Health and Safety or College rules. For further details of who can see live pictures, and the conditions under which the recordings will be reviewed, please write to Freedom of Information Officer, [foi@kings.cam.ac.uk](mailto:foi@kings.cam.ac.uk). CCTV imagery is retained for a period of up to 30 days before being overwritten and no personal

data is kept on our CCTV system beyond this 30 days. Processing of this information is for our legitimate interests.

#### C. Providing venues, catering and accommodation

We collect and hold personal data including name, contact details, food allergies and preferences, other special needs of members and guests who dine with us or hire our facilities, as well as any arrangements you make with the Catering or Maintenance Department for use of our premises or catering services. This information is retained for up to 8 years after our last contact with you. Payment details and financial information is retained for up to 7 years in case of audit. When we have a contract with you, that is the basis of processing; otherwise the basis is that it is necessary for our legitimate interests.

#### D. College policies

In some cases it is not possible to anonymise personal data, the processing of which is part of College policies or which is necessary to comply with, assess, and/or monitor College policies, for example the Equal Opportunities policy, Bullying and Harassment policy, or Health and Safety reviews. Processing of this information is for our legitimate interests, or in cases involving the health, safety, and welfare of our employees and certain others on site, the legal basis is our obligations under the Health and Safety at Work etc. Act.

#### **Who we share your data with**

We share personal information with third parties:- 1) in order to process credit/debit card payments; 2) in some cases, in order to process payments via our EPOS system; 3) as required by law; and 4) if your arrangements with the Catering Department require us to work with contractors.

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

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

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

Document Details		
Responsible Officer	First Bursar (via College Data Protection Lead)	
Original Date	22.01.2019	
Next Review Date	April 2027	
Version Control		
Version No.	Approval Date	Change Description
1	2019-01-22	Original approval by First Bursar on behalf of Council
2	2024-04-30	Transfer of existing policy to pro-forma
2.1	2025-04-07	Added compliance with College Policies, to the information processed under 'legal basis'
2.2		Update DPO address and company name.