

## **Data Protection Policy** **Library, Archive and Special Collections**

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. 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).

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

#### **1 – Users of Library and Special Collections**

This statement explains how King's College ("we" and "our") handles and uses information we collect about people who consult the Special Collections (library, art and archives) of the College ("you" and "your"), whether you visit in person or merely correspond with us. In broad terms, we use your information to ensure our compliance with Data Protection, Freedom of Information and copyright legislation, manage security of our holdings, and assist you with your enquiries.

The legal basis for processing your personal information is that it is necessary in order for us to assist you with your enquiries and/or your use of the Library and Special Collections, in some cases it is part of the permanent historic record of our activities, in some cases to protect ourselves in case of third party lawsuits, and in some cases to protect our assets. We will retain your information for the periods stated below unless or until you request us to do otherwise.

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

#### **A. Providing your requested services.**

We collect data about your use of the Library and Special Collections, including the data given in the table below:

<b>Document Type</b>	<b>Information Held</b>	<b>Retention Period and Purpose</b>
<i>visitors books and on-line diary</i>	<i>name, date(s) of visit(s), address, field of study. This information is visible to other researchers who visit at around the same time as you, and is therefore 'shared' with them.</i>	<i>visitor's books retained permanently as a record of the College's functions as a place of learning and research; on-line diary retained until superseded</i>

<i>call slips when you request materials from the Special Collections</i>	<i>surname, date(s) of request, material consulted</i>	<i>up to seven years in case damage or loss is discovered and we have to trace recent usage</i>
<i>reader registration forms and letters of introduction</i>	<i>contact information and your signature on a declaration under the Data Protection Act, in addition to which we retain the letter of introduction and a note of proof of identity (usually part of a Passport, photo government ID or Driving Licence number, and/or an entire University ID number)</i>	<i>current calendar year plus 75 years; being longer than the expected lifetime of most people who might be affected by reader breaches of the DPA</i>
<i>copy-order forms</i>	<i>your contact details and material requested, date of request, and you sign a declaration under the Designs, Copyrights and Patents Act, in addition to which we record the method and date of payment of the order and the date of our fulfilling the order</i>	<i>current calendar year of completing the order plus nine years; the time limitation for pursuit of damages is six years (but books may take several years to produce) and these are financial records kept for audit (current year plus six and the financial year is July-June)</i>
<i>photography licences</i>	<i>your contact details, date of request/visit, and you sign a declaration under the Designs, Copyrights and Patents Act, in addition to which we record the method and date of any payment for the licence</i>	<i>current calendar year of completing the order plus nine years; the time limitation for pursuit of damages is six years (but books may take several years to produce) and these are financial records kept for audit (current year plus six and the financial year is July-June)</i>
<i>forms requesting permission to use reproductions of material we own, in a publication</i>	<i>publication information and material requested, in addition to which we record the method and date of payment</i>	<i>current calendar year of completing the order plus nine years; the time limitation for pursuit of damages is six years (but books may take several years to produce) and these are financial records kept for audit (current year plus</i>

		<i>six and the financial year is July-June)</i>
<i>copyright permission request forms</i>	<i>your contact details, publication information, and a copy of the licence we grant and any charges we impose. This information is sometimes shared with our literary agents: Peters Fraser Dunlop.</i>	<i>retained permanently as a record of the College's activities</i>
<i>credit card charge forms</i>	<i>billing details, credit card number</i>	<i>current month plus five</i>
<i>our correspondence with you</i>	<i>contact details provided by you, any information about your request or research, and our response. If you give us permission, we may share your correspondence with other parties (such as copyright holders or donors, or researchers working on similar topics).</i>	<i>current calendar year of latest contact, plus two years. This allows us to follow up with information that may become available and be of interest in your research. If you are a member of the College (including if you are a former student), or if you are a relation of a current or former member of College, we may provide our Development Office with your contact details in order for them to update their records, whereupon the processing is also governed by their privacy policy.</i>
<i>Library user account records</i>	<i>Contact details provided by you, records of items borrowed and fines incurred and books requested. This information is stored by SirsiDynix, see <a href="http://www.sirsidynix.com/privacy">www.sirsidynix.com/privacy</a> for their privacy policy</i>	<i>Current academic year plus two years after user has left College. This allows us to reactivate your account if you then decide to stay on for further study or require NRM access to the Library. It also enables us to deal with any enquiries you might have about fines on your College bill.</i>

## **B. Collaborations with colleagues outside King's College.**

Collaborations outside King's College include planning of, and records of attendance at, professional events organised by King's staff or others; loans of Special Collections material we request or are asked to provide; reports of conservation work done; special projects such as collected works editions or books commissioned by the College or for which we play a more than supporting role; filming/photography/recording in College; and exhibitions for visiting groups. The details will include the contact details you supply us and the correspondence we exchange. Some of this information will be kept permanently where it provides a record of the College's activities.

The College archivists maintain a 'mutual assistance' list which includes your personal and professional contact details for use in disaster recovery. This will be kept as long as it is up to date, and deleted when it is no longer current, or when you request to be removed from the list. This information is held by your consent only and is only shared with others on the list.

## **C. Fulfilling our legal obligations under information legislation.**

The College is required to keep correspondence about your Data Protection and/or Freedom of Information requests for the duration of any complaints that you may raise. To meet this obligation and to promote efficiency in answering future similar enquiries we will retain the contact details and information you request, and a copy of our response, for the calendar year of last contact plus nine years.

## **2 – Donors to Library and Special Collections and Copyright Holders**

If you give us material for the Library or Special Collections, or if you own copyright in any of the material in the collections, we will permanently retain your name and contact details as part of the historic record of our activities, in order to maintain correspondence with you, and in order to help third party researchers who have questions about the materials. We will share your contact details with researchers only if you give us your permission to do so. In many cases you will also be alumni and/or friends of the college, in which case we will provide our Development Office with your contact details in order for them to update their records; see their privacy statement(s). Donor's names are given in catalogue records on our online catalogue, and in some cases (such as rare books) on bookplates that we put inside the books given by donors.

## **3 – Persons whose data is held within the Library and Special Collections Materials and Resources**

The Personal Papers collections in the Archives include names, contact details and/or other information about people who wrote to, or were written about by, people whose personal papers we hold. Sensitive personal data is put on restricted access and not shared with researchers, and non-sensitive data is available to researchers in the King's College Archives Centre. All new researchers sign a data protection declaration form upon registration as a researcher at King's, making them data controllers for the information they process from the archives. This processing is allowed under section 23 of <https://publications.parliament.uk/pa/bills/lbill/2017-2019/0066/18066.pdf>.

The College Archives contain personal data about alumni and previous staff and Fellows, held for the purpose of the historic record of the College's activities. We may share certain broadly known information such as your name, whether (or not) you came to King's and what you studied, upon request, but other information is withheld for 50 years (80 years for sensitive personal data of living parties). This exemption is allowed under section 23 of <https://publications.parliament.uk/pa/bills/lbill/2017-2019/0066/18066.pdf>.

The information of your involvement with a publication that is held in the Library is held both as the publication and in the Library's online catalogue records, which also include years of birth of authors and whether they are King's members.

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/make-a-complaint/>.

Document Details		
Responsible Officer	Ivan Collister (via the College Data Protection Lead)	
Original Date	15 May 2018	
Next Review Date	April 2028	
Version Control		
Version No.	Approval Date	Change Description
1	2018/05/15	Original approval
1.1	2018/10/11	Clarified how retention periods are calculated, changed one; formatting changes; removed CCTV as it was created separately at this time.
1.2	2019/01/22	Formatting only.
1.3	2020/03/05	Formatting; added processing of on-line diary and photography licences; minor clarification and change to retention periods, and clarified sharing.
1.4	2021/01/06	Specification of new UK data protection legislation.
1.5	2021/05/18	Added SirsiDynix data processor information.
2	2025/04/29	Clarified our literary agents. Updated ICO link. Transfer of existing policy to pro-forma
2.1		Updated DPO address and company name