

## **Data Protection Policy** **Services and Supplies**

This statement explains how King's College ("we" and "our") handles and uses information we collect about companies, organisations and individuals who supply goods or services to the College, or who wish to do so, and those to whom we supply goods or services, or wish to do so ("you" and "your"). It does not include students, staff, Friends, or visitors, for which there are separate privacy policies.

In some cases, you provide personal details for the employees or members who communicate directly with the College, and in some cases the College collects your contact details from publicly available sources such as websites. Such personal data is used by the College to communicate with you and is either necessary for the performance of our contractual duties and the provision of services, or satisfies our legitimate interests in expanding our client base.

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, 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 Freedom of Information Officer, [foi@kings.cam.ac.uk](mailto:foi@kings.cam.ac.uk).

### **A. How we use your personal information – *suppliers of goods and services***

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

Data provided by companies and organisations is used by the College to assess which services we require; to determine the appropriate suppliers to use; and to communicate with those suppliers. For those purposes, we would use the personal contact details where those are provided by the company or organization.

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

We share relevant personal data, when necessary, with relevant government agencies (e.g. HMRC) and with our auditors and professional advisors. This normally involves copies of invoices that may include personal data. We may, at the request of the company or organization, provide references on their performance and the individuals involved. Information is not shared with other third parties without your consent.

When requested by the supplier, Catering will share their contact information with potential and/or new Catering Department clients.

#### **Retention of data**

We retain information about suppliers while our relationship with that supplier persists, and for a further period while financial data is retained. Where an individual ceases to represent a company, or otherwise requests changes, we will remove the personal details except where they are included on past financial records.

#### **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.

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/>.

## **B. How we use your personal information – *clients using College services***

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

Data provided by individuals, companies, and organisations is used by the College to communicate and to ensure that we can provide the services that are required. This includes maintaining security by keeping information about vehicles, bicycles, rooms, and contact details.

We may use your contact details to send you offers, brochures, news of our activities or changes to our services. You may opt out of these communications by contacting the Freedom of Information Officer, [foi@kings.cam.ac.uk](mailto:foi@kings.cam.ac.uk).

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

We share relevant personal data, when necessary, with relevant government agencies (e.g. HMRC) and with our auditors and professional advisors. This normally involves copies of invoices that may include personal data. Where requests for services involve Meet Cambridge, or other parts of the University or Colleges, we may share data with those organisations. If your debts to us remain unpaid we may pass relevant data to appropriate agencies, e.g. a court, or debt collection service. Personal Information is not shared with other third parties without your consent.

### **Retention of data**

We retain information about those who enquire about services or to whom we provide those services while there is a reasonable expectation of further developments. So, we would keep data until all services and payments are complete and for a further 5 years thereafter. Copies of invoices and financial documents are retained for 7 years.

### **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.

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/>.

| Document Details    |               |   |
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| Original Date       | 15/05/2018    |   |
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| Version No.         | Approval Date | Change Description  |
| 1                   | 2018/05/15    | Original approval   |
| 2                   | 2019/01/22    | Formatting changes. Approved by First Bursar on behalf of Council.  |
| 3                   | 2020/03/05    | Added capacity to share (with permission) service providers' contact information with our clients, and sharing as necessarily with debt collection agencies. Approved by First Bursar on behalf of Council. |
| 4                   | 2020/11/10    | Enhanced description of how we collect data, added processing for marketing purposes; format changes  |
| 5                   | 2024/04/30    | Transfer of existing policy to pro-forma  |
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