

How we use your personal information

-- Website users

This statement explains how Churchill College (“we” and “our”) handles and uses information we collect when you visit the College website (www.chu.cam.ac.uk). Where you engage with the College for another purpose (e.g. as a prospective or current student, as a previous student, as a member of the College or as a visitor to the College), there are other data protection statements to explain our management of your personal information – see www.chu.cam.ac.uk/about/official-documents/data-protection-statements. Where you enter your personal information into an online form for any specified purpose, you will be told about the use we will make of that information (e.g. to send you newsletters or to enable your attendance at an event).

The controller for your personal information is Churchill College, Storey’s Way, Cambridge, CB3 0DS. 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 College otherwise responsible for data protection is Hannah James, College Data Protection Lead (information@chu.cam.ac.uk), and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal information, is the Bursar, Tamsin James, (bursar@chu.cam.ac.uk).

The legal basis for processing your personal data is that it is necessary for the purposes of our legitimate interests, where we have concluded that our interests do not impact inappropriately on your fundamental rights and freedoms. You may ask us to explain our rationale at any time. Churchill College is committed to the proper management of personal data.

How your data is used by the College

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

- A. for operating and improving our webpages, analysing their use and ensuring the security of our websites.
- B. to collect standard internet log information and details of visitor behaviour patterns. We do this to find out, for example, the number of visitors to each page of our websites.
- C. to ensure the security of our websites.

We collect the request made by your browser to the server hosting the website which includes the IP address, the date and time of connection and the page you ask for. We use this information to ensure the security of our websites and we delete it after a maximum of 50 months. We may use and disclose it as necessary in the event of a security concern or incident.

- D. to improve the user experience on our website.

We use ‘cookies’ on our website to improve user experience. Please note that you can set your browser to refuse ‘cookies’ or alert you when they are being sent. The ‘help’ portion of the toolbar of most internet browsers will tell you how to change the browser cookie settings to do this.

E. to provide you with services

In addition, we ask for specific personal information from you for the services outlined on the website (such as booking a reunion event, booking spaces at an Open Day, keeping in touch with the College, etc.). The legal basis for processing your personal information is that it is necessary in order for you to enter into a contract to provide the stated services to you.

If you have concerns or queries about any of the above, please contact us at the address given above.

How we protect your information

We implement a variety of security measures to maintain the safety of your personal information when you open an account or make a booking. Data retained by the College is kept on secure servers and shared only with staff that are directly involved with the running of the website. Account data as described above is held for a period of seven years from creation and then permanently deleted.

Who we share data with

We do not share your personal information with third parties. This does not include trusted third parties who assist us as noted above in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect our or others' rights, property, or safety. Non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

We share data with:

- A. Crucible assist us in operating our website and helping us to maintain, develop and improve it and the services we offer online. Please see the company's privacy policy (<https://crucible.io/privacy-policy>) for further details.
- B. Stripe: Financial data is processed by Stripe when you make payments online to the College (for example when paying for events, room bookings or services provided by the College). For information about how Stripe handle data from the EU please see the company's EU-U.S. and Swiss-U.S. Privacy Shield Policy (stripe.com/privacy-shield-policy#privacy-shield-principles) and privacy policy (stripe.com/gb/privacy).
- C. MailChimp: We use MailChimp as our marketing automation platform and email marketing service to send news and information to individuals who have voluntarily provided their data in order to stay in touch with the College. For information about how Mailchimp handle data from the EU (including certification from the EU-U.S. Privacy Shield Framework and the Swiss-U.S Privacy Shield Framework, please see Mailchimp's Privacy Policy (mailchimp.com/legal/privacy).
- D. Data sharing with the University of Cambridge is covered by a Data Sharing Protocol (www.ois.cam.ac.uk/policies-and-protocols/data-sharing-protocols).

Your rights

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 Wycliffe House, Water Lane, Wilmslow, SK9 5AF (ico.org.uk).

Contact

Please contact us at information@chu.cam.ac.uk if you have any questions about this statement or how we manage your personal data.

Last updated: 05/05/22

Hannah James