

ST HUGH'S COLLEGE WEBSITE PRIVACY NOTICE

A SUMMARY OF WHAT THIS NOTICE EXPLAINS

St Hugh's College is committed to protecting the privacy and security of personal data.

This notice explains what personal data St Hugh's College ("us" or "we") gather and hold about visitors to our website ("you"), how we use it internally, how we share it, how long we keep it and what your legal rights are in relation to it. If you access other websites, include those linked to on our site, you will need to consult the appropriate information on other sites for information on their policies and or statements.

For the parts of your personal data that you supply to us to us, this notice also explains the basis on which you provide the information. For the parts of your personal data that we generate about you, or that we receive from others, it explains the source of the data.

There are some instances where we process your personal data on the basis of your consent. This notice sets out the categories and purposes of data where your consent is needed.

St Hugh's College has also published separate notices, which are applicable to other groups and activities. To the extent that you complete a web form on our site, which asks you to give us certain information voluntarily (such as your name, contact information, email addresses or phone numbers) for a specific purpose, you may need to consult another of our notices to see how that data will be handled. For example, if you use a web form to register to attend a College event, you should also consult the conferences and events privacy notice. To obtain a full picture of how your data is treated, it is important that you read this privacy notice together with any other applicable privacy notices:

1. **current students**
2. **staff, office holders and senior members**
3. **staff, office holders and senior member applicants**
4. **alumni and donors (including what financial information we hold about our alumni and how we use it when considering fundraising initiatives)**
5. **archives (which explains what data we hold in our archive)**
6. **security, maintenance and health and safety (including how we use CCTV)**
7. **conferences and events**
8. **IT systems (including how we monitor internet usage)**
9. **Cookie notice.**

You can access past versions of our privacy notices at <https://www.st-hughs.ox.ac.uk/discover/governance/>.

WHAT IS YOUR PERSONAL DATA AND HOW DOES THE LAW REGULATE OUR USE OF IT?

"Personal data" is information relating to you as a living, identifiable individual. We refer to this as "your data".

Data protection law requires St Hugh's College as data controller for your data:

- To process your data in a lawful, fair and transparent way;

- To only collect your data for explicit and legitimate purposes;
- To only collect data that is relevant, and limited to the purpose(s) we have told you about;
- To ensure that your data is accurate and up to date;
- To ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- To ensure that appropriate security measures are used to protect your data.

ST HUGH'S COLLEGE'S CONTACT DETAILS

If you need to contact us about your data, please contact:

The Data Protection Officer
 St Hugh's College,
 St Margaret's road,
 Oxford
 OX2 6LE

dpo@st-hughs.ox.ac.uk

WHAT PERSONAL DATA WE HOLD ABOUT YOU AND HOW WE USE IT

Whenever you use a website, mobile application or other Internet service, certain information is created and recorded automatically. The same is true for our website(s), being those with URLs starting <http://www.st-hughs.ox.ac.uk/>.

In addition to the data we gather via web forms placed on our site (the handling of which will be governed by the relevant data protection notice covering the circumstances and context), we collect and generate a variety of data via our website(s).

Categories of data that we collect, store and use include (but are not limited to):

- Log data: Whenever you use our website, our servers automatically record information ("log data") regarding that access, including:
 - Any data sent by your browser or mobile app to enable you to access the site.
 - Location data of users (if provided by the connecting device).
 - Internet Protocol (IP) address of the connecting device or other unique device identifiers.
 - Browser type and setting for the connecting device.
 - The date and time of access.
 - Details of any attempts to log on to closed systems.
 - Crash data.
- Cookie data: We may use "cookies" (small text files sent by your computer each time you visit our website, unique to your visit or your browser) or similar technologies to record additional information. Our cookies record information including:
 - Language preferences.
 - Contents of online 'shopping baskets' (where relevant).

For further information on the cookies we use and the data each collects, please see our Cookie notice.

Most data collected is statistical data about our users' browsing actions and patterns, and does not identify any individual. However, there may be occasions where browsing patterns are connected to IP addresses or location data such that the data as a whole is personal data.

Whether we collect some of the above information often depends on your device type and settings. To learn more about what information your device makes available to us, please also check the policies of your device manufacturer or software provider

THE LAWFUL BASIS ON WHICH WE PROCESS YOUR DATA

The law requires that we provide you with information about the lawful basis on which we process your personal data, and for what purpose(s).

In most circumstances, we require your consent to place cookies on your device(s). When you access our website you are notified that we use cookies, and continued use of the site following that notification is taken as consent to the use of cookies.

If you would prefer that we do not use cookies, you should adjust your browser settings to reject cookie use. Your operating system may allow you to set your preferences in a variety of ways, including a "Do Not Track" setting. [If you enable the setting, we will not track your activity on our site.]

Where we use cookies for site security, or to ensure the proper functioning of the site (for example via the use of load-bearing cookies), we do not require your consent to the use of these cookies. We have a legitimate interest in their use and we process all data, as collected by those cookies, on that basis.

DATA THAT YOU PROVIDE TO US AND THE POSSIBLE CONSEQUENCES OF YOU NOT PROVIDING IT

The data that we collect via our website in the course of your accessing it, is provided by you on a voluntary basis. If you elect to adjust your browser settings to reject cookies, it may affect your experience in using the site, in the event that any blocked cookies support functionality.

OTHER SOURCES OF YOUR DATA

Apart from the data that you provide to us, we may also receive data about you from other sources:

- We may get information about you and your activity outside St Hugh's College from other third parties we work with. For example:
 - The University of Oxford (If you are authenticated with RAVEN)
 - Google Analytics shares information with the websites or apps where it runs to provide statistics. We also receive this information, which may include information such as whether clicks on other sites led to visits to our site. For more information about Google Analytics see <http://www.google.com/analytics/>.

HOW WE SHARE YOUR DATA

We do not, and will not, sell your data to third parties. We will only share it with third parties if we are allowed or required to do so by law.

Examples of bodies to whom we are required by law to disclose certain data include, but are not limited to:

Organisation	Why?
UK agencies with duties relating to the prevention and detection of crime, apprehension and prosecution of offenders, safeguarding, or national security.	We may share data with government departments, crime prevention and law enforcement agencies when required or considered appropriate in the circumstances and with the proper consideration of your rights and freedoms. [in cases where the law places a duty on us to report]
[INSERT OTHERS AS APPROPRIATE]	

Examples of bodies to whom we may voluntarily disclose data, in appropriate circumstances, include but are not limited to:

Organisation	Why?
Other Colleges and/or PPH's within the University of Oxford, University offices and/or departments	Data from cookies may be shared in pursuit of our legitimate interest in maintaining the proper function and security of our website, or where the other party has a legitimate interest is receiving the data for similar purposes. Data may also be shared in an anonymized and/or statistical format.
Legal advisers and auditors	To support our legal and financial obligations and objectives.
Third party service providers	To facilitate activities of St Hugh's College. Any transfer will be subject to an appropriate, formal agreement between St Hugh's College and the processor.
UK agencies with duties relating to the prevention and detection of crime, apprehension and prosecution of offenders, safeguarding, or national security.	We may share data with government departments, crime prevention and law enforcement agencies when required or considered appropriate in the circumstances and with the proper consideration of your rights and freedoms.

Where website information is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

All our third party service providers are required to take appropriate security measures to protect your personal information in line with our policies, and are only permitted to process your personal data for specific purposes in accordance with our instructions. We do not allow our third party providers to use your personal data for their own purposes.

SHARING YOUR DATA OUTSIDE THE EUROPEAN UNION

The law provides various further safeguards where data is transferred outside of the EU.

When you are resident outside the EU in a country where there is no “adequacy decision” by the European Commission, and an alternative safeguard is not available, we may still transfer data to you which is necessary for performance of your contract with us.

Otherwise, we will not transfer your data outside the European Union without first notifying you of our intentions and of the safeguards that apply to your data.

AUTOMATED DECISION-MAKING

We do not envisage that any decisions will be taken about you based solely on automated means. We will update this notice if this position changes.

HOW LONG WE KEEP YOUR DATA

We retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting, regulatory, disciplinary or reporting requirements.

The majority of website data is not held in a personally identifiable form for more than 1 year. Data which we need to hold for longer periods will be anonymized where possible.

Please note that we may keep anonymized statistical data indefinitely, but you cannot be identified from such data.

We adopt data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site. This includes regularly updated security precautions.

YOUR LEGAL RIGHTS OVER YOUR DATA

Subject to certain conditions and exception set out in UK data protection law, you have:

- The **right to request access** to a copy of your data, as well as to be informed of various information about how your data is being used;
- The **right to have any inaccuracies in your data corrected**, which may include the right to have any incomplete data completed;
- The **right to have your personal data erased** in certain circumstances;
- The **right to have the processing of your data suspended**, for example if you want us to establish the accuracy of the data we are processing.
- The right to receive a **copy of data you have provided to us**, and have that transmitted to another data controller (for example, another University or College).
- The **right to object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- The **right to object to the processing of your information** if we are relying on a “legitimate interest” for the processing or where the processing is necessary for the performance of a task carried out in the public interest.
- The **right to object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.
- Where the lawful basis for processing your data is **consent**, you have the **right to withdraw your consent at any time**. When you tell us you wish to exercise your right, we will stop further processing

of such data. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent. You may withdraw your consent by contacting:

The Data Protection Officer
St Hugh's College,
St Margaret's road,
Oxford
OX2 6LE

dpo@st-hughs.ox.ac.uk

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk/>). You may also wish to contact the St Hugh's College's Data Protection Officer if you are considering how or whether to exercise your rights.

You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office if you believe that your data has been processed unlawfully.

COOKIES USED ON OUR WEBSITE

All of our webpages use "cookies". Cookies are small text files that are placed on your computer by the websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Different types of cookies have different purposes and operate for different amounts of time.

- **Session cookies** are stored in temporary files on your device and are erased from your device when you close your browser. Session cookies allow websites to link the actions of a website visitor during single browser session, so that any page changes or selections are remembered as you move from page to page. For example, session cookies will make sure items you put into virtual 'shopping baskets' are transferred to 'checkout', or keep you logged in as you move within private sections of a website.
- **Persistent cookies** are stored on your device between browser sessions, either for a long term or time-limited period. They are only deleted when they either 'expire' or when you or your browser delete cookies from your device. Persistent cookies are used so that a website 'remembers' inputs and settings, including recalling log on data so that you do not have to log in again when you next visit. Persistent cookies may also recall which areas of a website interested you, in order to help you access those areas more easily in the future. They may also be used to collect data about your interests, choices, and other organisations and websites that you visit, in order to create a profile enabling marketing materials to be appropriately targeted.
- **Third party cookies** are cookies that are set by a domain other than the one being visited by the user. For details of any third party cookies we include in our domain, please consult the table below.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.aboutcookies.org or www.allaboutcookies.org.

Cookie	Duration	Purpose
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Cookie preference (cookieaccept)	Session	This cookie is used to remember a user's acknowledgement of cookies on the website.
Google Analytics _utma _utmb _utmc _utmz	Two years Session Cookie Not set Six months	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. Click here for an overview of privacy at Google
YouTube cookies		We embed videos from our official YouTube channel using YouTube's privacy-enhanced mode. This mode may set cookies on your computer once you click on the YouTube video player, but YouTube will not store personally-identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode. Read more at YouTube's embedding videos information page .
Localisation	Session	This is used by the website content management systems to keep track of the local time zone.
Language	Session	This is used by the website content management systems to know the language of the website
Mode	Session	This is used by the CMS for reference. It helps identify if the website user is anonymous or logged in (for editing).
Siteld	Session	This is used by the CMS for reference of the site identifier. It helps manage users across multiple domains for the same client (main site, microsite, mobile site).
NID PREF	Session	This is a third party cookie used by Google for tracking the number of people that are using Google's maps application.

To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

Changes to our Cookie Statement

Any changes we may make to our Cookie Statement in the future will be posted on this page.

COOKIE POLICY

BACKGROUND:

This website <https://www.st-hughs.ox.ac.uk/> ("Our Site") uses Cookies and similar technologies in order to distinguish you from other users. By using Cookies, We are able to provide you with a better experience and to improve Our Site by better understanding how you use it. Please read this Cookie Policy carefully and ensure that you understand it. Your acceptance of Our Cookie Policy is deemed to occur if you continue using Our Site. If you do not agree to Our Cookie Policy, please stop using Our Site immediately.

1. Definitions and Interpretation

In this Cookie Policy, unless the context otherwise requires, the following expressions have the following meanings:

"Cookie"	means a small file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site;
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 and of EU Regulation 2016/679 General Data Protection Regulation ("GDPR");
"Personal Data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data, as defined by EU Regulation 2016/679 General Data Protection Regulation ("GDPR"); and
"We/Us/Our"	means St Hugh's College of https://www.st-hughs.ox.ac.uk/ .

2. Information About Us

Our Site operated by Us, St Hugh's College

If you would like to know more about how We use Cookies, please contact Us at hello@st-hughs.ox.ac.uk, by telephone on +44 (0)1865 274900, or by post at St Hugh's College, St Margaret's Road, Oxford, OX2 6LE.

For more information about privacy, data protection and our terms and conditions, please visit [see here](#).

3. How Does Our Site Use Cookies?

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Site for website usage and advertising purposes. By collecting this data, we can continually improve the website experience. These cookies are small text files which are stored on your computer by your web browser. They are not computer programs, and they can't read any other information saved on your hard drive. They can't spread viruses or obtain sensitive user information such as email addresses and credit card numbers.

All Cookies used by and on Our Site are used in accordance with current Cookie Law. We may use some or all of the following types of Cookie:

A. Strictly Necessary Cookies

A Cookie falls into this category if it is essential to the operation of Our Site, supporting functions such as logging in, your shopping basket, and payment transactions.

B. Analytics Cookies

It is important for Us to understand how you use Our Site, for example, how efficiently you are able to navigate around it, and what features you use. Analytics Cookies enable us to gather this information, helping Us to improve Our Site and your experience of it.

C. Functionality Cookies

Functionality Cookies enable Us to provide additional functions to you on Our Site such as personalisation and remembering your saved preferences. Some functionality Cookies may also be strictly necessary Cookies, but not all necessarily fall into that category.

D. Targeting Cookies

It is important for Us to know when and how often you visit Our Site, and which parts of it you have used (including which pages you have visited and which links you have visited). As with analytics Cookies, this information helps us to better understand you and, in turn, to make Our Site and advertising more relevant to your interests. Some information gathered by targeting Cookies may also be shared with third parties.

E. Third Party Cookies

Third party Cookies are not placed by Us; instead, they are placed by third parties that provide services to Us and/or to you. Third party Cookies may be used by advertising services to serve up tailored advertising to you on Our Site, or by third parties providing analytics services to Us (these Cookies will work in the same way as analytics Cookies described above).

F. Persistent Cookies

Any of the above types of Cookie may be a persistent Cookie. Persistent Cookies are those which remain on your computer or device for a predetermined period and are activated each time you visit Our Site.

G. Session Cookies

Any of the above types of Cookie may be a session Cookie. Session Cookies are temporary and only remain on your computer or device from the point at which you visit Our Site until you close your browser. Session Cookies are deleted when you close your browser.

Cookies on Our Site are not permanent and will expire as indicated in the table below.

For more details of the personal data that We collect and use, the measures we have in place to protect personal data, your legal rights, and our legal obligations, please refer to our Privacy Policy.

For more specific details of the Cookies that We use, please refer to the table below.

4. What Cookies Does Our Site Use?

The following third party Cookies may be placed on your computer or device:

Name of Cookie	Purpose & Type	Provider
DoubleClick	These cookies identify user sessions, passing information back to Google Analytics. With this information, we can improve the website experience.	https://www.doubleclickbygoogle.com/
Google Tag Manager	These cookies identify user sessions, passing information back to Google Analytics. With this information, we can improve the website experience.	Google.com
Facebook	This cookie identifies user sessions, passing information back to Facebook's advertising platform. This allows us to communicate the latest offers and events via Facebook and Instagram ads.	Facebook.com
Fullstory	To track and improve the use of the website	https://www.fullstory.com/

Omniconvert	Session cookies to provide specific web content to relevant users	https://www.omniconvert.com/
Responsetap	Adds unique phone numbers so that calls derived from the website can be tracked	https://www.responsetap.com/

Our Site uses analytics services provided by Google.com, Facebook.com and Responsetap.com. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the products and services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

The analytics service used by Our Site use analytics Cookies to gather the required information.

The analytics services used by Our Site uses the following analytics Cookies:

Name of Cookie	Purpose & Type	Provider
Universal Analytics	These cookies identify user sessions, passing information back to Google Analytics. With this information, we can improve the website experience.	https://policies.google.com/privacy
Facebook Pixel	This cookie identifies user sessions, passing information back to Facebook's advertising platform. This allows us to communicate the latest offers and events via Facebook and Instagram ads.	https://www.facebook.com/
Response Tap	This cookie identifies user sessions, passing information back to Response Tap's reporting platform. This allows Us to	https://www.responsetap.com/

	see which page a user made a phone call from.	
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5. Control

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed.

The links below provide instructions on how to control Cookies in all mainstream browsers:

Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en-GB>

Microsoft Internet Explorer: <https://support.microsoft.com/en-us/kb/278835>

Safari (macOS): https://support.apple.com/kb/PH21411?viewlocale=en_GB&locale=en_GB

Safari (iOS): <https://support.apple.com/en-gb/HT201265>

Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-Cookies-website-preferences>

Android: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DAndroid&hl=en>

6. Changes to this Cookie Policy

We may alter this Cookie Policy at any time. Any such changes will become binding on you on your first use of Our Site after the changes have been made. You are therefore advised to check this page from time to time.

In the event of any conflict between the current version of this Cookie Policy and any previous versions, the provisions current and in effect shall prevail unless it is expressly stated otherwise.

FUTURE CHANGES TO THIS PRIVACY NOTICE

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes or to make the St Hugh's College's or the University's operations and procedures more efficient. If the change is material, we will publish details of the change not less than two months' notice of the change so that you can exercise your rights, if appropriate, before the change comes into effect.

Version control: V.1.0 (May 2018)