

Brasenose College Legitimate Interest Assessment – Alumni, Supporters and Friends (v1.2 – May 2018)

Although it is not compulsory for an organisation to have a written record of an LIA, the ICO does state that this process does help demonstrate compliance in line with the College's accountability obligations under Articles 5(2) and 24 of the GDPR.

To conduct an LIA, ICO guidance requires that the College consider three tests (set out below with their sub-questions) in relation to any given processing activity:

Purpose test: Is the College pursuing a legitimate interest?

(i) Why does the College want to process the data what is it trying to achieve?

The College has a legitimate interest in maintaining a record of its cultural life, deepening its relationships with alumni and supporters and recognising their achievements at College and public level. The College has a legitimate interest in facilitating communications with alumni and supporters, recording and recognising contributions and ensuring that there is a positive and well-informed ongoing relationship.

(ii) Who benefits from the processing? In what way?

The processing of data supports the College, alumni, supporters, students and the wider community; enhancing a positive long term relationship between all stakeholders, helping to maintain a record of ongoing College life and facilitating communications.

(iii) Are there any wider public benefits to the processing?

Statutory compliance.

(iv) How important are those benefits?

Processing is necessary

(v) What would the impact be if the College could not go ahead?

The College would not be able to comply with certain statutory regulations. We would not be able to maximise our cultural role in society for the public benefit.

(vi) Would the College's use of the data be unethical or unlawful in any way?

No.

Necessity test: is the processing necessary for that purpose?

(i) Does the processing proposed help to further the legitimate interest?

Yes.

(ii) Is there another, less intrusive, way to achieve the same result?

No. A deep personal relationship benefits our alumni, supporters and current College members as well as the College in the long-term.

(iii) Is it a reasonable way to go about it?

Yes – it deepens relationships and communications

Balancing test: Do the Individual's interests override the legitimate interest?

(i) What is the nature of the College's relationship with the individual?

- Current and former students
- Donors
- Friends
- Honorary Fellows
- Employees

(ii) Is any of the data particularly sensitive or private? (This is not limited to special category or criminal data, but extends also to data such as financial data)

Yes we keep financial information in perpetuity recording money received and distributed. Information on dietary requirements, disability and other health issues in relation to event attendance.

(iii) Would people expect the College to use their data in this way?

The College believes so. We have managed an 'opt-out' scheme for many years and have respected the wishes of alumni and supporters since that scheme has been in place.

(iv) Are you happy to explain it to them?

Yes. Please contact us at the Development Office on development.office@bnc.ox.ac.uk.

(v) Are some people likely to object or find it intrusive?

Possibly but the College has a framework in place should anyone chose to object. Please contact us at the Development Office.

(vi) What is the possible impact on the individual?

The individual may find it intrusive and halt our relationship.

(vii) How big an impact might it have on them?

Limited but they would no longer be able to engage in the life of the College.

(viii) Is the College Processing children's data?

Yes but only to include very basic information (e.g. one son, one daughter).

(ix) Are any of the individuals vulnerable in any other way?

Yes – disabled, elderly, mental health issues.

(x) Can/Does the College adopt any safeguards to minimise the impact?

Information is seen on a need-to-know basis.

(xi) Does the College offer an opt-out to data subjects?

Yes – anyone wishing to do so can contact:

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