Brasenose College Web Services Cookies & Privacy Notice (v1.2)

This privacy notice sets out how Brasenose College gathers and processes information from our various websites listed below:

www.bnc.ox.ac.uk
All Sub sites of bnc.ox.ac.uk (e.g. staff.bnc.ox.ac.uk)
All Sub sites of the domain brasenose.org (e.g. it.brasenose.org)
brasenosejcr.org
brasenosehcr.org

A summary of what this notice explains

Brasenose College is committed to protecting the privacy and security of personal data.

This notice explains what personal data Brasenose College (“us” or “we”) gather and hold about visitors to our various websites (“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.

Brasenose 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 & 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.bnc.ox.ac.uk/privacypolicies.

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 Brasenose 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.

Brasenose College’s Contact Details

If you need to contact us about your data, please contact: data.protection@bnc.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 ending in:

bnc.ox.ac.uk
brasenose.org
insidebrasenose.org
brasenosejcr.org
brasenosehcr.org

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.
o 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:
  o Language preferences.
  o 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.

https://www.bnc.ox.ac.uk/cookie-policy

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 Brasenose College from other third parties we work with. For example:
o The University of Oxford (If you are authenticated with RAVEN or Shibboleth)

o 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/.

o Cloudflare. Some of the College’s websites are protected by Cloudflare. Your IP addresses data can be passed via this service.

**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:

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Why?</th>
</tr>
</thead>
<tbody>
<tr>
<td>UK agencies with duties relating to the prevention and detection of crime, apprehension and prosecution of offenders, safeguarding, or national security.</td>
<td>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]</td>
</tr>
<tr>
<td>Jisc Services Limited</td>
<td>Our Internet service provider is Jisc. The College is required as part of its obligations to Jisc to disclose both user and device information on request. (JANET - Joint Academic Network)</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Why?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other Colleges and departments within the University of Oxford, University offices and/or departments</td>
<td>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.</td>
</tr>
<tr>
<td>Legal advisers and auditors</td>
<td>To support our legal and financial obligations and objectives.</td>
</tr>
<tr>
<td>Third party service providers</td>
<td>To facilitate activities of Brasenose College. Any transfer will be subject to an appropriate, formal agreement between Brasenose College and the processor.</td>
</tr>
<tr>
<td>Organisation</td>
<td>Why?</td>
</tr>
<tr>
<td>--------------</td>
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</tr>
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</tr>
</tbody>
</table>

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.

More information on the categories of recipients of your data is set out in a table called Brasenose Data Sharing found here [https://www.bnc.ox.ac.uk/privacypolicies](https://www.bnc.ox.ac.uk/privacypolicies).

**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 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. For example:
您的数据法律权利

根据英国数据保护法的规定，您拥有以下权利:

- 您有权要求访问您数据的副本，以及被通知关于如何使用您的数据的各种信息；
- 您有权更正数据中的任何不准确性，其中包括将任何未完成的数据完成；
- 您有权在某些情况下删除您的个人信息；
- 您有权在您想要我们核实数据的准确性时暂停数据处理。
- 您有权接收您已经提供给我们的数据副本，并将其传送给另一个数据控制者（例如，另一所大学或学院）。
- 您有权反对我们进行直接营销（例如，电子邮件营销或电话）。
- 您有权反对我们基于“合法利益”进行的处理，或者在进行的处理对于您在公共利益中所进行的任务是必要的。
- 您有权反对任何自动决策关于您，这可能会产生法律效果或其他严重影响您。
- 如果数据处理的法律依据是您的同意，您有权在任何时候撤销您的同意。这不会影响您合法处理您的数据的时间。

如果您希望行使与您的数据有关的任何权利，请联系我们的数据保护官员 data.protection@bnc.ox.ac.uk。某些权利不自动开始，我们保留拒绝您行使权利的权利。


未来隐私通知的变更

我们可能需要不时更新本通知，例如如果法律或监管要求发生变化，或者如果技术更改或要使布拉森诺斯学院或大学的操作和程序更有效率。如果变更具有重大意义，我们将至少提前两个月发布变更详情，以便您在变更生效前可以行使您的权利，如果适用的话。

版本控制：V.1.1 (April 2018)
Cookies used by Brasenose College on our websites

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 form 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 form 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](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

<table>
<thead>
<tr>
<th>Cookie Preference (cookieaccept)</th>
<th>Session</th>
<th>This cookie is used to remember a user's acknowledgement of cookies on the website.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Google Analytics _utma _utmb</td>
<td>Two years Session Cookie</td>
<td>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,</td>
</tr>
<tr>
<td>Cookie</td>
<td>Value</td>
<td>Description</td>
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<td>-----------------</td>
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</tr>
<tr>
<td>_utmz</td>
<td>Not set</td>
<td>Six months, 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.</td>
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<tr>
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<td>YouTube cookies</td>
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<td></td>
<td>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.</td>
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<td>Localisation Session</td>
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<td></td>
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<td>This is used by the website content management systems to keep track of the local time zone.</td>
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<tr>
<td></td>
<td></td>
<td>Language Session</td>
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<td></td>
<td></td>
<td>This is used by the website content management systems to know the language of the website.</td>
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<td>Mode Session</td>
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<td>This is used by the CMS for reference. It helps identify if the website user is anonymous or logged in (for editing).</td>
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<td>Siteld Session</td>
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<tr>
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<td></td>
<td>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).</td>
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<tr>
<td></td>
<td></td>
<td>NID Session</td>
</tr>
<tr>
<td></td>
<td></td>
<td>This is a third party cookie used by Google for tracking the number of people that are using Google’s maps application. Google’s maps are used on the contact us and location page.</td>
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<td>PREF</td>
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</table>

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

**Version control: V.1.2 (May 2018)**