

Brasenose Colleges GDPR ROPA - Financial, Commercial & Supplier Related Processing - v1.4 (Reviewed June 2023)

ID.	Category of personal data	Source of the data	Why we process it	How long we keep this data	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal conviction/criminal allegation grounds	Criminal conviction/criminal allegation grounds (further information)
1	Supplier and contractor information including names, contact details, communications with contractors, details of contracts, tender information, works undertaken, items purchased, invoicing arrangements, VAT numbers and payments made, banking details, information about the selection of contractors/suppliers, including information about the quality and/or value of the work or products.	We obtain this data from you; We generate this data about you.	As part of the College's normal operations and dealings with its suppliers and contractors.	In the case of transaction records, seven years from end of the financial year in which the work was completed. For data relating to fixed assets this period may be longer In the case of information about the selection of contractors/suppliers, including information about the quality and/or value of the work or products, we will retain this whilst you remain a supplier or potential future supplier to the College.	Processing is necessary for performance of our contract with you; Processing is necessary in order to take steps at your request prior to entering a contract; Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College has a legitimate interest in engaging suppliers and contractors that meet its required standards.				
2	Records relating to event and merchandise sales and purchases consisting of date of the order, details of the event/merchandise booked, sold or purchased, the amount due, the contact and payment details of the purchaser including credit card number/credit card security number, direct debit or bank transfer (account holder, number and sort code) information and receipts.	We obtain this data from you We generate this data about you	To process payments for events and merchandise.	Seven years from end of the financial year in which the transaction occurred.	Processing is necessary for performance of our contract with you; Processing is necessary in order to take steps at your request prior to entering a contract.					
3	Records relating to conference bookings consisting of communications and inquiries, details of the event/conference, the amount due, the contact and payment details of the purchaser.	We generate this data about you	To process bookings and payments for conferences.	In the case of inquiries, a period of 7 years after the date of the inquiry, or 7 years after the conference if later. Papers delivered and information relating to conferences may be retained indefinitely in the College archive (details are explained in the privacy notice relating to College archives). In the case of transaction records, seven years from end of the financial year in which the transaction occurred.	Processing is necessary for performance of our contract with you; Processing is necessary in order to take steps at your request prior to entering a contract.					
4	Title documents, transfers, leases and contracts which include the names of parties, signatories and witnesses.	We obtain this data from you	In order to execute and retain title documents, transfers, leases and contracts.	In the case of contracts, for a period of 7 years after conclusion of the contract. Documents relating to ownership of College assets are retained in perpetuity In the case of title documents, transfers and leases, for a period of 12 years after the College disposes of its interest in the property.	Processing is necessary for performance of our contract with you Processing is necessary in order to take steps at your request prior to entering a contract Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in entering contracts, leases and transfers of land, and in retaining records and title documents to assist with the management of its properties and establishing title over land and property				
5	Budget documents, audit and accounting documents, management accounts, investment documents and communications relating to such records, all of which may include names and contact details of individuals responsible for or involved with the budgets/accounts/investments.	We generate this data about you We obtain this data from you. We obtain this data from third parties e.g. accountants.	As a normal part of the College's budgetary and accounting processes.	Seven years from end of the financial year to which the records relate.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in operating processes for budgeting, auditing, accounting and investment purposes.				
6	Bank account records, including names of payees and transaction details.	We receive this data from a third party (the bank).	In the normal course of operating the College bank account.	Seven years from end of the financial year to which the records relate.	Processing is necessary for performance of our contract with you; Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College has a legitimate interest in processing its own banking records for cashflow, accounting and audit purposes.				

7	Governing body and committee agenda, governance documents, and some legal, financial, buildings and architectural records are kept in the College archive- for further detail see the College archive privacy notice and accompanying schedule.	We obtain this data from you. We generate this data about you.	To maintain a historic record of College administration.	Permanently.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in maintaining its historic buildings. It also has a legitimate interest in maintaining a record of its activities as part of a long established university with a strong identity and history, and in maintaining such records for future research.	Processing is necessary for archiving purposes in the public interest as permitted under the UK Data Protection Act	There is a public interest in the College maintaining its archive of College life for future generations, and in the context of the College being a College of a long-established University with a strong identity and history. The College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of measures or decisions with respect to a particular data subject, unless the	The processing meets a condition in Part 1 of Schedule 1 to the Data Protection Act 2018	Where it processes such data, the College is required to implement appropriate safeguards for individuals' rights and freedoms. The UK Data Protection Act provides safeguards by making specific provision preventing processing which is likely to cause substantial damage or substantial distress to a data subject; and/or which is carried out for the purposes of measures or decisions with respect to a particular data subject, unless the purposes of approved medical research.
8	Records generated for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom of information legislation, records made to comply with safeguarding, health and safety or counter-terrorism legislation, in connection with legal advice or claims, or to comply with auditors' requirements.	We generate this data about you. We obtain this data from you. We obtain this data from third parties e.g. legal advisors.	So that we have a record of information supplied, both in the interests of good administration and also to meet legal and regulatory requirements.	These records will be retained for a period of 7 years from the date generated for compliance purposes unless there is compelling justification for the data to be retained for a longer period (eg in connection with legal advice, or in relation to auditing obligations).	Processing is necessary for compliance with a legal obligation		Substantial public interest under the UK Data Protection Act 2018	Where it processes special category data for these purposes, the College is complying with its obligations under legislation, the processing is typically necessary for the purposes of prevention or detection of an unlawful act, or the exercise of a function conferred by law. The processing is necessary for reasons of substantial public interest, namely the requirement for the College to comply with its statutory and legal obligations.	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018	Where it processes special category data for these purposes, the College is complying with its obligations under legislation, the processing is typically necessary for the purposes of prevention or detection of an unlawful act, or the exercise of a function conferred by law. The processing is necessary for reasons of substantial public interest, namely the requirement for the College to comply with its statutory and legal obligations.