

**Brasenose Colleges GDPR ROPA - ICT Functions, including users of College email and telephone/mobile devices - v1.4 (Reviewed July 2023)**

ID.	Category of personal data	Source of the data	Why we process it	How long we keep this	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	Firewall, security and PC misuse incident log files consisting of the date and time of incident, which user (name and/or user name), details of the incident and any consequential action taken.	We generate this data about you	In the course of maintaining the College's networks, protecting their integrity, investigating computer misuse and to minimise the risk of misuse recurring. Such records might also be used for disciplinary purposes where staff or students have breached College policies.	7 years from the date we learn of the incident.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms;  Processing is necessary for compliance with a legal obligation	The College has a legitimate interest in maintaining the integrity of its systems, to investigate misuse and taking action to prevent misuse recurring.  Keeping such records is also necessary to comply with the College's security and accountability obligations under data protection laws.			The processing is necessary for purposes of the prevention or detection of an unlawful act and must be carried out without the consent of the data subject, so as not to prejudice those purposes.	
2	Login information for students, staff, fellows and visitors consisting of time, date and duration of login, username and name of person logging in, their university card number, IP and MAC addresses associated with login, records of which users have printed documents and at what time/date, details of any charges for printing. We also hold records of the level of access permission users have to the system and which areas (e.g. staff, student, visitor, administrator). We also hold encrypted / obfuscated password information and records of internet usage (including records of sites visited, time and date of visit).	We obtain this data from you  We generate this data about you	As a necessary part of the management and operation of our systems and controlling who has access to them. In cases of misconduct or copyright abuse such records might also be used as part of any investigation or staff/student disciplinary action.  Records of internet usage are required to assist with troubleshooting and determining which users are affected by a security incident.  They are also required to monitor and/or prevent: -malicious network traffic -suspected access of illegal materials, alleged copyright infringement and/or violations of University or College IT or disciplinary regulations  Encrypted password information is held to enable users to login to our systems with their password.	Login information and internet use logs are retained for 12 months.  Password and access level information is retained for as long as you are entitled to use our systems (e.g. whilst you are a student or staff member).	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.  Processing is necessary for compliance with a legal obligation.  In the case of staff and students, processing is necessary for performance of our contract with you.	The College has legitimate interest in keeping records of who has accessed its systems, websites visited and activity to assist with IT security and in taking disciplinary action under its contracts with staff or students if appropriate.  Keeping such records and monitoring activity is also necessary to comply with the College's security and accountability obligations under data protection laws.			The processing is necessary for purposes of the prevention or detection of an unlawful act and must be carried out without the consent of the data subject, so as not to prejudice those purposes.	
3	IT support logs and records consisting of user names/contact information, dates and times of requests/problems, details of requests and details of steps taken and resolution of requests.	We generate this data about you	In the normal course of operating and maintaining our systems	IT support logs are retained for 7 years	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms;  Processing is necessary for compliance with a legal obligation;	The College has a legitimate interest in keeping such records to help it maintain the functioning and security of its systems.  Keeping such records is also necessary to comply with the College's security and accountability obligations under data protection laws.				
4	Records of telephone calls made and received (records of numbers called to/from, duration of calls).	We obtain this data from you	The data is provided to us by providers of telephone services (mobile and landline) to the College. We use this data to ensure we have been invoiced correctly by the provider, and to check that College provided telephones are being used in accordance with College policy.	Records are retained for 7 years.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	We have a legitimate interest in the proper and efficient administration of College telephones and in ensuring they are being used correctly.	N/A		N/A	