Privacy Policy – SafeZone Mass Alerts system

A. WHAT IS THE PURPOSE OF THIS DOCUMENT?

The University of Oxford is committed to protecting the privacy and security of your personal information ('personal data').

This privacy policy describes how your personal data will be processed for the purpose of the SafeZone – Mass Alerts system, in accordance with the General Data Protection Regulation (GDPR) and related UK data protection legislation. It is important that you read this policy, together with any other privacy policy we may provide on specific occasions when we are collecting or processing information about you, so that you are aware of how and why we are using the information.

B. GLOSSARY

Where we refer in this policy to your 'personal data', we mean the information specified in section D that is about you and from which you can be identified, whether directly or indirectly. It does not include data where your identity has been removed (anonymous data).

Where we refer to the 'processing' of your personal data, we mean anything that we do with that information, including collection, use, storage, disclosure, deletion or retention.

C. WHO IS USING YOUR PERSONAL DATA?

The University of Oxford [1] is the "data controller" for the information that we hold about you as a result of your work or study at the University. This means that we decide how to use it and are responsible for looking after it in accordance with the GDPR.

This policy does not form part of any contract of employment or other contract to provide services. We may update this policy at any time.

[1] The University's legal title is the Chancellor, Masters and Scholars of the University of Oxford.

D. THE TYPES OF DATA WE HOLD ABOUT YOU

The information we hold about you may include the following:

• Personal details such as name, telephone number and University email address

E. HOW THE UNIVERSITY OBTAINED YOUR DATA

We obtain the vast majority of information directly from you, through the application process for recruitment and studies.

F. HOW THE UNIVERSITY USES YOUR DATA

We process your data to populate the Safe – Mass Alerts systems so that the University has the ability to send Mass Alerts to its staff and students in the event of a threat to life or of personal injury. We set out below those circumstances where it is necessary for us to process your data. (These circumstances are not mutually exclusive; we may use the same information under more than one heading.)

1. Where we need to comply with a legal obligation.

We need to process your data in order to meet legal obligations set out in "The Terrorism (Protection of Premises) Bill", also known as Martyn's Law which is due to come in to effect in 2025.

In particular, the procedures for alerting persons at, or in the immediate vicinity of, the premises or event.

2. Where it is necessary to meet our legitimate interests

There may be circumstances in which it is necessary for us to process your data to protect an interest which is essential for your life or that of another person in the event of threat of personal injury.

3. Where it is necessary in order to protect your vital interests or the vital interests of another person

There may be circumstances in which it is necessary for us to process your data to protect an interest which is essential for your life or that of another person in the event of threat to life situations.

If you remove your personal information from the system

If you choose to unenroll from the SafeZone – Mass Alerts system, it may impair our ability to fulfil our obligations to you, or to comply with our other legal obligations.

G. CHANGE OF PURPOSE

We will only process your data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

Please note that we may process your data without your knowledge or consent where this is required or permitted by law.

H. DATA SHARING WITH THIRD PARTIES

In order to perform our contractual and other legal responsibilities, we may, from time to time, need to share your information with the following types of organisations:

- CriticalArc The supplier of the SafeZone Mass Alerts system
- Our internal and external auditors;
- Emergency services, in the event of threat to life or of personal injury situations

Where information is shared with third parties, we will seek to share the minimum amount necessary. For example, we may share only your name and telephone number.

All our third-party service providers that process data on our behalf are required to take appropriate security measures to protect your data in line with our policies. We do not allow them to use your data for their own purposes. We permit them to process your data only for specified purposes and in accordance with our instructions.

I. DATA SECURITY

We have put in place measures to protect the security of your information. Details of these measures are available from the <u>University's Information Security website</u>.

Third parties that process data on our behalf will do so only on our instructions and where they have agreed to keep it secure.

J. RETENTION PERIOD

We will retain your data for as long as we need it to fulfil our purposes, including any relating to legal, accounting, or reporting requirements.

Details of the retention periods for different types of HR data are available here: <u>http://www.admin.ox.ac.uk/personnel/recruit/rec_recs/retention/</u>

K. YOUR RIGHTS

Under certain circumstances, by law you have the right to:

• **Request access** to your data (commonly known as a "subject access request"). This enables you to receive a copy of your data and to check that we are lawfully processing it.

• **Request correction** of your data. This enables you to ask us to correct any incomplete or inaccurate data we hold about you.

• **Request erasure** of your data. This enables you to ask us to delete or remove your data under certain circumstances, for example, if you consider that there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).

• **Object to processing** of your data where we are processing it to meet our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your data for direct marketing purposes.

• **Request the restriction of processing** of your data. This enables you to ask us to suspend the processing of your data, for example, if you want us to establish its accuracy or the reason for processing it.

Depending on the circumstances and the nature of your request it may not be possible for us to do what you have asked, for example, where there is a statutory or contractual requirement for us to process your data and it would not be possible to fulfil our legal obligations as your employer if we were to stop. You can withdraw your consent at any time, by emailing the relevant department. If you choose to withdraw consent it will not invalidate past processing. Further information on your rights is available from the Information Commissioner's Office (ICO).

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, you should contact the University's Information Compliance Team at <u>data.protection@admin.ox.ac.uk</u>. The same email address may be used to contact the University's Data Protection Officer. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

If you remain dissatisfied, you have the right to lodge a complaint with the ICO at <u>https://ico.org.uk/concerns/</u>.

L. KEEPING YOUR DATA UP-TO-DATE

It is important that the data we hold about you is accurate and current. Please keep us informed of any changes that may be necessary during your working relationship with us by emailing securityservices.updates@admin.ox.ac.uk. If you wish to update or remove your data from the Mass Alerts system, please contact <u>securityservices.updates@admin.ox.ac.uk</u>.

M. CHANGES TO THIS PRIVACY POLICY

We reserve the right to update this privacy policy at any time, and will seek to inform you of any substantial changes. We may also notify you in other ways from time to time about the processing of your personal data.