

# JESUS COLLEGE MAY BALL DATA PROTECTION POLICY

## Introduction

In the course of its activities, Jesus College May Ball collects and uses certain types of personal information about guests, contractors and sponsors, committee members, staff, and others who come into contact with Jesus College May Ball. As well as contact information, Jesus College May Ball may hold other types of information such as bank details, and it is important that all information is handled correctly.

Jesus College May Ball takes the protection of privacy very seriously. This policy sets out the basis on which any data Jesus College May Ball collects or that it provides, will be processed by Jesus College May Ball. Please read the following carefully to understand Jesus College May Ball's views and practices regarding data and how Jesus College May Ball will treat it.

For the purposes of this policy 'Data Protection Legislation' means the General Data Protection Regulation (2016/679) (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), the Data Protection Act (DPA) 2018 and all applicable laws and regulations relating to the processing of personal data and privacy, including where applicable the guidance and codes of practice issued by applicable data protection regulators. It will apply to information regardless of the way it is used, recorded and stored and whether it is held in paper files or electronically.

This policy will be updated as necessary to reflect best practice or amendments made to Data Protection legislation

*The guiding principle is that information should only be collected, used, shared or retained insofar as this is reasonably necessary for the running of the charity.*

The seven data protection principles as laid down in current Data Protection legislation should be followed at all times. According to Article 5(1) of the GDPR, personal data should be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals;
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. Accurate and, where necessary, kept up to date;
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Additionally, according to Article 5(2) of the GDPR:

7. The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1.

### **Registration with the Information Commissioner's Office (ICO)**

As Jesus College May Ball only processes information relating to its core business purposes, it is not registered with the Information Commissioner's Office. As it do not process criminal offence or special category data (relating to race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, sex life or sexual orientation) and does not regularly or systematically monitor data on a large scale, Jesus College May Ball does not have a Data Protection Officer.

However, Jesus College May Ball may be required to make documentation of its compliance with GDPR available to the ICO on request.

These conclusions have been drawn following scrutiny of the ICO guidelines available on their website, and from other materials published by them:

- Registration self-assessment questionnaire on the ICO website:  
<https://ico.org.uk/for-organisations/data-protection-fee/self-assessment/>
- Data Protection Officer self-assessment questionnaire on the ICO website  
<https://ico.org.uk/for-organisations/does-my-organisation-need-a-data-protection-officer-dpo/>

### **Personal Data**

'Personal data' is information that relates to an individual which can identify the individual directly or indirectly (in combination with other information).

A sub-set of personal data, known as 'Special Category Data', must be given extra protection. Special category data is information relating to race or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, trade union membership, physical or mental health, sexual life, genetics or biometrics. Jesus College May Ball does not process any special category data and individuals are under no obligation to disclose to Jesus College May Ball any special category data.

The processing of criminal offence data is also restricted. Jesus College May Ball does not process any criminal offence data.

Personal data may be shared among current Jesus College May Ball committee members who require it for event planning. It may also be transferred from one year's committee to the next using a suitably secure method. Reasonable steps should be taken to ensure that outgoing committee members securely erase copies of personal data from their own devices and storage locations after transferring it to their incoming counterpart. Previous committee members will not be considered as third parties when processing personal data with or on behalf of current committee members for the purposes of event planning. However personal data should not be transferred to previous committee member's devices in order to keep the personal data as secure as possible.

### **Disclosure of Personal Data to Third Parties**

Unless an exemption applies, disclosure of any personal data to trusted third parties will only occur for specific, necessary purposes which do not adversely affect the rights, freedoms or interests of the individual concerned. No personal data will be publicly published without the consent of the individual concerned.

Where Jesus College May Ball relies on legitimate interests to lawfully disclose personal data to third parties, the individual concerned has the right to object to this disclosure. If Jesus College May Ball ever receives a disclosure request from a third party, it will take reasonable steps to verify the identity of that third party before making any disclosure.

In some circumstances, there may be exemptions from certain obligations and restrictions of certain rights set out by GDPR. These will be considered on a case-by-case basis, using advice from the ICO website:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/exemptions/>

Exemptions exist in circumstances involving, but not limited to:

- Confidential references
- Crime and taxation
- Legal proceedings
- Legal professional privilege
- Research and statistics
- Negotiations

These exemptions may allow Jesus College May Ball to disclose information to third parties or restrict an individual's rights in connection with their personal data.

### **Dealing with a Data Protection request**

Individuals have certain rights regarding the processing of their data, as set out by the GDPR.

All requests from individuals exercising their rights under Data Protection Legislation can be made verbally or in writing. Individuals are recommended to direct requests and concerns to the President(s) by emailing [president@jesusmayball.com](mailto:president@jesusmayball.com) or in writing, directed to The Presidents, Jesus College May Ball, Jesus College, Cambridge, CB5 8BL. However committee members must be prepared to receive requests verbally, and must be made aware of the correct procedure in directing the request to the committee member responsible for dealing with the request.

When deciding whether a request is valid for the information or purpose concerned, it is highly recommended that the Jesus College May Ball member dealing with the request consults this document as well as the Information Commissioner's Office (ICO) website (<https://ico.org.uk>) to assist with their decision making. Only certain rights are only applicable for some types of data, depending on the legal basis chosen to justify data collection, so full advice on the ICO website should be read before a decision is made. These legal bases are given in the section 'Groups'.

Jesus College May Ball may ask for any further information reasonably required to locate the information and to verify the identity of the individual. If Jesus College May Ball believes that the requested right does not apply in the specific situation, or a request is excessive or

repetitive, Jesus College May Ball has the right to refuse to comply with the request. The individual will be informed of this decision and the reasons why no action was taken.

If the individual is unhappy with the outcome of their request, they have the right to make a complaint to the Information Commissioner's Office (<https://ico.org.uk/make-a-complaint/>) or another supervisory authority, and can seek to enforce their right to rectification through a judicial remedy.

All data must be reviewed before any disclosure takes place, in order to check that the information being disclosed is suitable to satisfy the request without compromising the privacy of any third parties. Information will not be disclosed or transmitted before this review has taken place.

The rights of an individual under Data Protection Legislation are as followed:

1. The right to be informed

- The Jesus College May Ball Privacy Notice must always be provided to individuals at the time of data collection. This is a concise and intelligible document which informs the individual about the collection and use of their data, as well as their rights under GDPR.

2. The right of access

- Individuals have a right to be provided with confirmation that their personal data is being processed, a copy of their personal data and information about the source of the data, as well as other supplementary information detailed in the GDPR.
- If a request is within the individual's rights, Jesus College May Ball will provide the requested information within 28 days of the date the request was received, in a common electronic format, unless the individual has requested otherwise. No information will be amended with the intention of preventing its disclosure.
- Jesus College May Ball can refuse to comply with a subject access request if the personal information of a third party would be disclosed, unless the third party has consented to the disclosure.
- Where all the data in a document cannot be disclosed, a permanent copy should be made and either the data not to be disclosed should be obscured, or the data to be disclosed should be retyped. A copy of the full document and the altered document should be retained, with the reason why the document was altered. This explanation should also be given to the individual.

3. The right to rectification

- Individuals have a right to have inaccurate personal data rectified.
- If an individual discovers that information which Jesus College May Ball holds in relation to them is inaccurate or out of date, they can request rectification, detailing the inaccuracy, and the accurate information.
- Jesus College May Ball will arrange for information to be corrected where Jesus College May Ball is in agreement that the previous information was inaccurate. The correction will be made and the individual will be notified within 28 days of the date the request is received.
- If Jesus College May Ball disagrees that the information is inaccurate, it will discuss the matter with the individual, but Jesus College May Ball has the right to maintain the original information.

- Jesus College May Ball can only rectify data in the case where it believes that the identity of the ticket holder remains the same. Changing the ticket holder's name to that of another individual will incur a fee, as set out in the Terms and Conditions for ticket purchase.

#### 4. The right to erasure

- Individuals have a right for their personal information to be erased in certain circumstances, including when the information is no longer necessary for the purpose for which it was originally collected, or the individual wants to withdraw their consent for their information to be used for the original purpose.
- If the right to erasure applies, Jesus College May Ball will erase the individual's personal data and notify the individual within 28 days of the date the erasure request was received. Jesus College May Ball will also take reasonable steps to erase any copy of the personal information that has been made public online.

#### 5. The right to restrict processing

- Individuals have a right under Data Protection Legislation to restrict their personal information being processed in certain circumstances, including when the accuracy of the information is being verified, Jesus College May Ball is considering an objection to the processing of this information, or the individual requires the information to be stored to establish, exercise or defend a legal claim beyond the period for which Jesus College May Ball intended to store it.
- If the right to restrict processing applies, Jesus College May Ball will restrict the processing of data, starting no later than 28 days after the date the processing restriction request was received, and until the restriction can be lifted. During the period of restriction, the personal information will be still be stored, but all current committee members will be told not to process this information, and any information published online will be removed.

#### 6. The right to data portability

- Individuals have a right in certain circumstances to receive their personal information or request for their personal information to be sent directly to another controller where technically feasible, in a structured, commonly used and machine-readable format. This right only applies if the personal information has been provided with consent or for performance of a contract, and Jesus College May Ball is processing this information by automated means.
- If the right to data portability applies, personal information will be transmitted within 28 days of the date the request was received.
- Jesus College May Ball can refuse to comply with a subject access request if the personal information of a third party would be disclosed, unless the third party has consented to the disclosure.
- Jesus College May Ball is not responsible for any subsequent processing carried out by the individual or the organisation to which the individual has requested their information to be sent.
- If Jesus College May Ball receives personal information from third parties due to a data portability request, it will be under the sole control of the individual who has made the request and used only for the individual's purposes.

#### 7. The right to object

- Individuals have a right to object to the processing of their data if the processing is for direct marketing purposes, carried out in the public interest, or for Jesus College May Ball's legitimate interests or those of a third party.
- If the objection is due to direct marketing, Jesus College May Ball will cease processing the individual's data within 28 days of the date the request was received, but it may retain some information while ensuring that the individual's request not to receive direct marketing in the future is respected.
- If the objection is due to processing carried out in the public interest or the legitimate interests of Jesus College May Ball or a third party, the individual must clearly state their reasons for objecting in their request. In these cases, Jesus College May Ball will consider the individual's request but does not have to comply with it if it demonstrates compelling legitimate grounds for the processing.
- If data collection is for direct marketing processing, or the legal basis for processing is a public task or legitimate interests, individuals must be informed of their right to object at the time of first communication.

#### 8. Rights in relation to automated decision making and profiling.

- Jesus College May Ball does not rely on any decisions made only by automated means without human involvement.

### **International Transfer of Data**

Jesus College May Ball will not transfer any personal data outside of the EEA.

### **Security of Personal Data**

Jesus College May Ball will take reasonable steps to ensure that Jesus College May Ball committee members will only have access to personal data relating other individuals where it is necessary for them to have it. All committee members will be made aware of this Policy and their duties under Data Protection Legislation. Jesus College May Ball will take all reasonable steps to ensure that all personal information is held securely and is not accessible to unauthorised persons.

### **Personal Data Breaches**

If Jesus College May Ball becomes aware of a personal data breach, it will notify the ICO within 72 hours of the breach being detected. It will also take reasonable steps to inform the individuals concerned without undue delay if it believes that the breach is likely to result in a high risk to the rights and freedoms of the individual.

### **Contacts**

If anyone has any concerns or questions in relation to this policy they should contact [president@jesusmayball.com](mailto:president@jesusmayball.com).

## **Data Audit**

This section outlines the types of information held by Jesus College May Ball and aims to provide guidelines for its committee members regarding each type of data as to:

- why the data is collected;
- the lawful basis used to justify its collection;
- the third parties to which this data can be disclosed;
- the committee members who should be able to access this data; and
- how long the data should be retained for before deletion.

Information is held by Jesus College May Ball on five distinct groups, comprised of individuals holding specific roles within the organisation:

- Committee members (current and previous), and current applicants
- Guests
- Contractors
- Sponsors
- Staff
- Contacts at organisations we work alongside, including Jesus College, Cambridge City Council and Cambridgeshire County Council

Where required, consent must be sought at the time of data collection from each individual for their information to be stored and used by Jesus College May Ball for the specified purpose(s) given. This consent can be withdrawn by the individual at any time. A record of the individual's consent should be stored until it is withdrawn or the data is deleted.

Where legitimate interests has been identified as the appropriate legal basis for data processing, a reference to the relevant Legitimate Interests Assessment has been provided in the tables.

### ***Committee Members (Current and Previous) and Applicants for the Current Year***

This group includes all individuals who are members of, or have applied to be members of the upcoming Jesus College May Ball, and those who were members in previous years.

Information held on this group of people includes:

<b>Data Held</b>	<b>Reason</b>	<b>Third Party Recipients</b>	<b>Lawful Basis for Processing</b>	<b>Access</b>	<b>Retention</b>
Name	Enabling communication and informing of decisions	Jesus College; Contractors; Sponsors	Contract	All Jesus College May Ball committee members	Until ticket allocation has been claimed
		Public	Consent		
Jesus May Ball email address (current members only)		Public	Contract		The link between the individual's personal and May Ball email addresses will be removed by November after the May Ball for which they were/applied to be on the committee.
Personal/ university email address		N/A	Contract		Until ticket allocation has been claimed
Phone number		Jesus College; Contractors; Sponsors	Contract		November after the May Ball for which they were/applied to be on the committee.
Close-up (current members only)	Improving communication with contractors, guests and other individuals/ organisations by publishing online alongside name and contact details.	Public	Consent		
Photograph(s) taken at event	Event promotion;	Received from photographers. Shared publicly on social media.	Legitimate interests	Secretary; Presidents.	Until an erasure request is received.
Bank Details (current members only)	Reimbursing expenses	N/A	Contract	Treasurer, Presidents	November after the May Ball for which they were on the committee.



## **Guests**

This group includes all individuals who will be guests at the upcoming Jesus College May Ball, or have been guests at previous Jesus College May Balls.

Information held on this group of people includes:

Data Held	Reason	Third Party Recipients	Lawful Basis for Processing	Access	Retention
Name	Communication and informing of event details; ID check on entrance; Confirming Jesus College alumni status; Confirming bursary status.	Security company; Hired staff; Jesus College Development Office.	Contract	All Jesus College May Ball committee members	November after the Ball which they attended.
Email address and Cambridge University CRSID	Communication and informing of event details	N/A	Contract		
	Direct marketing on behalf of the event sponsors	N/A	Legitimate interests		
College	Confirming Jesus College student status.	N/A	Contract	Ticketing officer; Presidents; Treasurer.	
Year of Matriculation	Confirming Jesus College alumni status.	Jesus College Development Office	Contract		
Bank Details	Requested when the individual must be refunded.	N/A	Contract		November after the Ball which they attended.
Photograph(s) taken at event	Event promotion; souvenirs for guests.	Received from photographers. Shared publicly on social media.	Legitimate interests	Secretary; Presidents.	Until an erasure request is received.

### ***Contractors and Sponsors***

This group includes all individual contractors and individuals who are members of contracted companies that will be, potentially could be, or have been contracted to provide goods, services or sponsorship at Jesus College May Ball.

Information held on this group of people includes:

Data Held	Reason	Third Party Recipients	Lawful Basis for Processing	Access	Retention
Name	Communication; Writing a contract; Controlling site security; Ensuring staff have sufficient training.	Cambridge City Council; Security company;	Contract; Legitimate interests (retention)	All Jesus College May Ball committee members	Until an erasure request is received
Email	Communication;	Cambridge City Council; Insurers			
Phone number					
Address					
Bank Details	Paying for goods and/or services provided.	N/A			November after individual worked at Jesus College May Ball.
Vehicle number plate	Controlling site security.	Security Company; Jesus College.			November after individual worked at Jesus College May Ball.
Documentation relating to insurance, health and safety, and event licence compliance	Ensuring guest wellbeing and compliance with event licence; Complying with conditions of Jesus College May Ball's insurance policy in the event of a claim; Complying with terms of use of the venue.	Cambridge City Council; Insurers; Jesus College.	Legal obligations; Contract		Indefinite
Photograph(s) taken at event.	Event promotion;	Received from photographers. Shared publicly on social media.	Legitimate interests	Secretary; Presidents.	Until an erasure request is received.

### **Staff**

This group includes all individuals employed directly by Jesus College May Ball and individuals employed by Jesus College who work at Jesus College May Ball.

Information held on this group of people includes:

Data Held	Reason	Third Party Recipients	Lawful Basis for Processing	Access	Retention
Name	Communication; Writing a contract; Controlling site security; Ensuring staff have sufficient training.	Security company; Hired staff.	Contract	All Jesus College May Ball committee members	March after individual worked at Jesus College May Ball.
Email	Communication;	N/A		Staffing officers; Presidents	
Phone number					
Address	Writing a contract.			Staffing officers; Treasurer; Presidents	November after individual worked at Jesus College May Ball.
Bank Details	Paying for goods and/or services provided.				
Photograph(s) taken at event	Event promotion; Recruitment purposes.	Received from photographers. Shared publicly on social media.	Legitimate interests	Secretary; Presidents.	Until erasure request is received.

### ***Other Individuals***

This group includes individuals who work at organisations that Jesus College May Ball works and co-operates with. This includes, but is not limited to individuals within Jesus College Cambridge, Cambridge City Council and Cambridgeshire Fire Service.

<b>Data Held</b>	<b>Reason</b>	<b>Third Party Recipients</b>	<b>Lawful Basis for Processing</b>	<b>Access</b>	<b>Retention</b>
Name	Communication	N/A	Legitimate interests	All Jesus College May Ball committee members	Until the individual no longer has connections to Jesus College May Ball, or organisations it communicates with.
Email address					