

Worcester College - GDPR ROPA - ICT Function v1.4 (February2022)

| 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. | 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. | Login information is retained for 24 months. | 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. | | | 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 3 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 | |

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| 5 | Records of the level of access permission users have to the system and which areas (e.g. staff, student, visitor, administrator) | 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. | For as long as a user is entitled to use our systems (e.g. whilst they are a student or staff member). | In the case of staff and students, processing is necessary for the performance of our contract with you. Processing is necessary for the purpose 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 keeping records of the levels of access to its systems. | | | | |
| 6 | Records of which users have printed documents and at what time/date, details of any charges for printing. | We generate this data about you | As a necessary part of the management and operation of our printing systems and to enable the re-charging and allocation of print costs. | For as long as a user has an account in our print system (e.g. whilst they are a student or staff member) | In the case of staff and students, processing is necessary for the 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 keeping records relating to the functioning of its printing services. | | | | |
| 7 | Records of internet usage (including records of sites visited, time and date of visit, IP and MAC address of device and University username). | We generate this data about you | 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 | 3 Months as per the minimum required by OxCert - https://help-archive.it.ox.ac.uk/network/security/monitoring/index.html | 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 the performance of our contract with you. | 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. | | | 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. | |
| 8 | Recordings of meetings | We obtain this data from you We generate this data about you | Recordings of meetings are used to make meetings available to those who are unable to access the meeting at its initial/original time | The data will be retained only for so long as we need it to meet our purposes. | Processing is necessary for performance of a task in the public interest. Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms. | Where we rely on legitimate interests, a Legitimate Interests Assessment will be undertaken before processing occurs | | | | |