# How we use your personal information

## *-- Students*

This data protection statement explains how Hughes Hall ("the College", "we" and "our") handles and uses information we collect about those applicants we make an offer of study to, and students once they join the College ("you" and "your"). In broad terms, we use your personal information to manage the ongoing relationship between the College and you as part of our lifelong community of scholars. This includes guiding and supporting your academic studies, maintaining and reviewing your academic progress and pastoral welfare, reviewing your financial commitments to the College and (if you live in College accommodation) managing our relationship with you as a resident.

When changes are made to this statement, we will publish the updated version on our website and notify you by other communications channels as we deem appropriate or necessary.

The controller for your personal information is the College, Hughes Hall, Wollaston Road, Cambridge, CB1 2EW. The designated Data Protection Officer appointed by the College under UK GDPR is Intercollegiate Services Limited (ISL) [64 Bridge Street, Cambridge, CB2 1UR; 01223 768745; dpo@isl.colleges.cam.ac.uk]. Your primary contact for all data protection matters is the Bursar, via compliance@hughes.cam.ac.uk. This is the same address to contact if you want to exercise any of your data protection rights, including requesting copies of personal data the College holds about you, or making a complaint about how the College has managed your personal data.

The normal legal basis for processing your personal information is that it is necessary in the performance of one or more contracts with us (including preparing to become a student and member of the College, the expectations on both sides during your course of studies and any related accommodation contract). We have commitments to other external bodies (particularly the University of Cambridge) as part of those contracts, and we outline below (see "*How we share your personal information"* ) how and when we ordinarily will share your personal information. For some specific purposes, we may rely on another legal basis, including where we are required for compliance with a legal obligation (e.g. financial records, equal opportunities monitoring), or where we believe it is in our legitimate interest to do so (e.g. to enable your access to external services). You may ask us for further information on these matters at any time if you have specific concerns.

### How your information is used by the College

We collect and process your personal information, as specified below, for a number of purposes, including:

A. maintaining your personal details, including ensuring effective communications with you;
B. maintaining a formal record of your academic progress and achievements at the College, the University of Cambridge and elsewhere;
C. maintaining a formal record of your other engagements with and achievements at the College, the University of Cambridge and elsewhere
D. maintaining a record, where appropriate, of any particular personal needs you require to participate fully in College and University life (including any support needs that are, or have been, provided by the College or the University during your course of studies), as well as information about your general health and wellbeing;
E. maintaining financial records relating to your studies, your funding and other financial support arrangements;
F. provision of references to third parties;

G. maintaining a record of your behaviour and in particular where there has been concerns or complaints raised about you;
H. maintaining a record of any complaints you make to the College and their outcomes;
I. maintaining a record of any references received;
J. provision of incoming students' preferred email and course details to the MCR to enable contact to be made in advance of arrival and to assist with the welcome arrangements to help freshers settle into College;
K. maintaining data to enable the College and the University to produce statistics and research for internal and statutory reporting purposes.

Further details are provided in the Annex. If you have concerns or queries about any of these purposes, please contact us at the address given below, or contact the Bursar, via compliance@hughes.cam.ac.uk.

We also operate CCTV on our sites, which will capture footage of movements around the College site and a SALTO lock system, which uses user-ID technology. Our CCTV policy can be viewed at Policies and documents - Hughes Hall.

Please note that if you engage with us for any other purpose (e.g. you work for us, or volunteer for us), there are additional data protection statements that you will be provided with for those other purposes, usually at the first point of engagement.

## How long we keep your information for

At the point of graduation (or when you go out of residence for the final time), the College reduces your personal information to a subset of information so that the College can retain a sufficient record of your academic achievements for references and other related purposes, and your time at the College.

The Annex outlines specific retention periods for certain categories of information: most of these are determined by legal requirements relating to that specific information.

Where no specific retention period is noted, or at the end of the specified retention periods, the College reduces your personal information to a subset of information so that the College can retain a permanent record of your academic achievements. The archived record would retain:

- Biographical details (includes names, date of birth, contact details)
- Application information, including applicant number, offer accepted date, offer letter sent date, offer confirmed date
- USN, CRSid, programme, course type
- Start and end term dates, degree conferred date
- Academic records (including results)
- Records of merit-based awards or special prizes
- Career

Finally, we strongly encourage all of our students to remain in touch with the College after they leave and, for that reason, we transfer a subset of this information to our Development Office. You are encouraged to read our separate statement about personal information for alumni, which covers your ongoing lifelong membership of the College at Policies and documents - Hughes Hall.

## How we share your personal information

*Within the College*

We share the following information with relevant people within the College:

- Name
- CRSid
- College Address
- Preferred contact details
- Emergency contact(s) including home address and details of next of kin
- Your photograph
- Course Details including duration of course

This sharing of information is considered necessary for the College to operate smoothly; you can request a greater level of privacy by contacting the Bursar, at compliance@hughes.cam.ac.uk. The College also takes photographs of its students, either individually and/or as a group in a matriculation and graduation photographs. These are widely used within the College and may be on public display. Otherwise, the College restricts the sharing of your personal information within the College in line with its data protection policy.

The Annex of this statement contains additional detail on how the College wellbeing team use and store sensitive data such as medical information.

*With the University*

By being a member of a College and registering for a course of study, you are automatically a member of the University of Cambridge. The academic and student support arrangements between the College and the University of Cambridge are complex and vary depending on your course and level of study. Information relating to you (and your academic studies) is shared routinely and often with the University, and the University and its partners (including the College) have a data sharing agreement to govern such interactions and information transfers in both directions, as well as a shared student record system and database.

The personal information shared with the University will include only that which is necessary for you to undertake and complete your studies and your examinations, and in addition will include any information necessary for the College to fulfil its obligations and agreements with the University about the shared University community (including sufficient information for the University to record and collate instances of student behaviour or complaints across all of the Colleges and the University). Where possible, the College will notify you of its intention to share such data in advance.

The University is a separate legal entity to the College and has its own statement about your personal information and its procedures, which you can view at: How we use your personal information (for students) | Information Compliance. It in turns shares information with the affiliated student unions and a number of other bodies for statutory and other purposes.

*With other organisations*

The College routinely shares information with, and receives information from, where appropriate:

- Cambridge City Council and other local authorities (to provide evidence of any rights to or exemptions from local services and taxes, including electoral registration and council tax);
- your funding providers/sponsors, as agreed with them and /or you, including the Student Loans Company;

- Universities and Colleges Admissions Service (in relation to your application, offer and requirements to meet any offer of study);
- the NHS or other health services in case of an emergency
- the MCR (the Middle Common Room of the College, of which every student is automatically a member)

We may also be subject to a legal requirement (with or without your consent) to share your personal information with some government agencies under special circumstances (e.g. relating to crime or health and safety), such as the police or security services or other statutory authorities with investigatory powers. Where possible, the College will notify you of its intention to share such information in advance.

We will normally provide confirmation of your qualifications and other academic references to a prospective employer or financial sponsor if it is reasonably clear that it would be in your interests to do so, and we have made reasonable checks to ensure the information is being requested for that purpose.

We may also provide personal information to agencies and trusted advisers in order to receive professional advice or guidance (examples include legal and audit services, the College's insurers and their agents, fee status verification services, intercollegiate agreements) or to provide services to you through a third party on our behalf. In such circumstances, data sharing agreements are in place to ensure your personal information is not retained for longer than necessary or shared more widely.

The College may share information with organisations overseas as part of arrangements related to your membership of the College (e.g. field trip, student exchange programme, liaison with an overseas funding provider). In most cases, this will be related to the operation of a contract.

Any transfers of your data overseas or to international organisations, as set out above, or data storage in cloud servers based outside the UK, are protected by an adequacy decision by the European Commission or by standard data protection clauses adopted under the UK GDPR 2021 and Data Protection Act 2018, or if the organisation the data is transferring to has been certified and placed on the Data Privacy Framework List.

*Publication of your personal information*

We would urge you to be careful when sharing personal information about other students in public social media sites and other similar environments. We would not normally make your personal information publicly available without your consent.

Please also note the University's people search function may also be widened to be accessible to the general public by changing the settings at http://www.lookup.cam.ac.uk/self. Its default setting is restricted to access to members of the University and all Colleges: UIS provides this option because it helps significantly in building community relations and networks and helps others get in touch with you easily.

## Your rights

You have the right: to ask us for access to, rectification or erasure of your personal information; to restrict processing (pending correction or deletion); to object to communications; and to ask for the transfer of your personal information electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss why we might not comply with a request to exercise them.

If you have questions or concerns about your personal information, or how it is used, please speak to the relevant College staff in the first instance. For further guidance, contact compliance@hughes.cam.ac.uk.

If you remain unhappy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (https://ico.org.uk/).

*Updated: June 2026*
*J Watkinson, Compliance Manager*

**ANNEX – Students Data Retention**

We collect and process your personal information, as specified below, for a number of purposes, including:

A. maintaining your personal details, including ensuring effective communications with you;

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

i) your current name and any previous names you have had;
ii) unique personal identifiers (e.g. student number, CRSID, date of birth, photograph);
iii) your current and previous contact details;
iv) next-of-kin or emergency contacts.

The personal information specified in Annex A (i), (ii) and (iii) forms part of your permanent student record and is stored securely and retained indefinitely in accordance with the College's data processing statement for alumni. The information listed in Annex A (iv) is normally retained until **one year** after you complete your studies. We will assume that you have obtained permission from your next-of-kin or emergency contact for us to hold their information for that purpose.

B. maintaining a formal record of your academic progress and achievements at the College, the University of Cambridge and elsewhere:

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

i) your application details, our assessment of your application and the details of any offer(s) of study we have made;
ii) records of your academic provision from the College (including supervisions, College examinations and other academic support);
iii) matriculation and graduation details and records of your academic qualifications (including those prior to becoming a member of the College);
iv) other details of your academic progress or achievements (e.g. College or University awards or prizes).

This information is normally retained until **seven years** after you complete your studies.

C. maintaining a formal record of your other engagements with and achievements at the College, the University of Cambridge and elsewhere:

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

i) records of your membership of College committees, the Middle Common Room (MCR) and College clubs and societies;
ii) awards, prizes and achievements in College or University-related activities (e.g. music, arts, sports etc.).

This information is normally retained until **seven years** after you complete your studies.

D. maintaining a record, where appropriate, of any particular personal needs you require to participate fully in College and University life (including any support needs that are, or have been, provided by the College or the University during your course of studies), as well as information about your general health and wellbeing:

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

i) details of any disability, illness, and any consequent learning support, social support or other support needs;
ii) details of any serious risks affecting you (e.g. severe allergies);
iii) arrangements agreed with you to manage your use of College and University facilities (e.g. computing services, sports facilities, libraries, accommodation, learning spaces), including any special requirements that may be linked to your health or religious beliefs;
iv) other information to support your health, safety and wellbeing.

We may also retain copies of statements from professional medical advisers, provided either by you or directly to us.

If you, or a supporting professional, disclose medical or disability information, this is stored confidentially and access limited to the core wellbeing team, which comprises the Senior Tutor, Head of Student Wellbeing & Welfare, Head of Education Services and College Health Practitioner. If a key decision needs to be made this will be taken to the Student Finance and Welfare Committee in confidence. Please note that it is not possible to disclose only to one member of the core wellbeing team and where the team perceives there to be a significant threat to you or another person, they retain the right to make a relevant external disclosure (for example to the emergency services, your disclosed emergency contact or the university clinical team) for support and guidance. This approach is in line with good safeguarding practice and the relevant legislation relating to management of risk.

If we need to use software to manage your data (for example our clinical records system, Cliniko) this will be stored securely with password protection and encryption.

All personal information will be managed in line with our data protection policy.

This information is normally retained until **seven years** after you complete your studies. Data recorded during visits to the College Health Practitioner are logged on the Cliniko Practice Management software, managed and securely hosted by an external supplier. This data is retained until **eight years** after you complete your studies.

Please note that where you are referred to services not offered directly by the College e.g. the University Counselling Centre and the University's Accessibility and Disability Resource Centre, these support services will have their own data protection statement (or privacy notice) and we advise you pay close attention to these.

E. maintaining financial records relating to your studies, your funding and other financial support arrangements:

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

i) records of your sources of funding support and tuition fee liabilities and, where relevant, records of your accommodation liabilities and other related charges, (e.g. Caution Money) as well as what monies are to be, and have been, collected by the College on behalf of itself and the University;
ii) records of any financial support agreed by the University and/or the College (including Cambridge Bursaries, other studentships or awards, additional discretionary funding, benefits or waivers approved by the College);
iii) where you reside in accommodation owned or managed by the College, copies of any accommodation contract(s);

iv) where appropriate, your banking details in order to conduct financial transactions, and records of such transactions;
v) records of your College financial account, including balance and transactions;
vi) copies of any correspondence with you about any of the above matters.

Where this information includes the personal information of others (e.g. parental income evidence), we will assume that you have their permission to provide it to us for our purposes. This information is normally retained until **seven years** after you complete your studies.

## F. provision of references to third parties:

In addition to the information above (and particularly your achievements in B and C above), we retain personal information (provided by you or created by us), including:

i) records of your advisers, including where relevant your Tutor, Director of Studies and other nominated College personnel who provided you with personal support.

This information is normally retained until **seven years** after you complete your studies.

## G. maintaining a record of your behaviour, in particular where there has been concerns or complaints raised about you:

We retain personal information (provided by you or by others, or created by us), including:

i) details of any investigations undertaken by the College into your conduct or behaviour (e.g. disciplinary investigations, fitness to study investigations, complaints made against you);
ii) a record, including the final outcome, of any investigation of the University into your conduct or behaviour.

The College has several complaints procedures, relating to different matters, which you are expected to familiarise yourself with and, in all cases, personal information will be managed in line with our confidentiality policy. We recognise that investigations may include information or statements of either a sensitive or disputed nature, and that such records require a high level of confidentiality. Wherever possible, we will discuss and agree with you in advance with whom and when we share this information, but reserve the right to disclose information to others in matters relating to significant risks to your health and safety or the health and safety of others.

This information is normally retained until **seven years** after you complete your studies. The College reserves the right to retain this information in the case of an ongoing legal complaint or a case which is not considered fully closed by both parties.

## H. maintaining a record of any complaints you make to the College and their outcomes:

We retain personal information (provided by you or by others, or created by us), including:

i) details of any complaints you have made to the College and their outcomes, where these have been taken through the College complaints procedure.

This information is normally retained until **seven years** after you complete your studies.

I. maintaining data to enable the College and the University to produce statistics and research for internal and statutory reporting purposes.

It is difficult to provide a comprehensive list, but we retain personal information (provided by you), including:

i) information relating to "equal opportunities" (e.g. nationality, ethnicity, religious and other beliefs, gender, sexuality, age) in order to fulfil legal requirements of the College or the University;
ii) information relating to known relationships with other members (past or present) of the University of Cambridge or any of the Colleges;
iii) information relating to your rights to live, work and study in the United Kingdom;
iv) any criminal record that may affect your status as a student of the University or the College;
v) others

This information is normally retained until **seven years** after you complete your studies.

If you have queries about any of these purposes, please contact compliance@hughes.cam.ac.uk.

*Updated: June 2026*
*J Watkinson, Compliance Manager*