Privacy Notice for the Oxford Learning Hub (learn.oxford.anglican.org)

This privacy notice explains how ODBF processes personal data in our general day-to-day work on the Oxford Learning Hub. It should be read in conjunction with additional privacy notices which explains our handling of personal data in specific circumstances (for specific activities or groups of people). All our privacy notices are available at https://www.oxford.anglican.org/privacy

1. What is personal data?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in our possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation 2016/679 (the "GDPR") and the Data Protection Act 2018, (the "DPA 2018").

The data we collect is:

- Required Personal Data This is your first name, last name, username, email address, location via your internet protocol (IP) address.
- Optional Personal Data You may add more personal data to your profile on this site, including a photograph.
- Academic Programme Data We store information about your academic programme, including length of course, start and end dates, prior learning credits, programme of study and University identification number.
- Material submitted by you as part of your studies This includes essays and other assessed pieces of work. It also includes forum posts, quizzes and feedback forms. This will always include the time and date of submission.
- Marks and assessment feedback All of your marks and comments by your tutors will be stored.
- Technical Data When you use our Moodle site we automatically collect your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Usage Data Moodle records information about how you use our website, resources viewed, activities undertaken and materials accessed.

2. Who are we?

Oxford Diocesan Board of Finance (ODBF) is the data controller for the Oxford Learning Hub (contact details below). This means it decides how your personal data is processed and for what purposes.

3. How do we process your personal data?

ODBF complies with its obligations under the GDPR and DPA 2018 by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We may use your contact data for the following purposes:

- To monitor users of the Learning Hub for IT, administrative and analytical purposes
- To track Hub and course engagement, to improve the offering available
- Administration of study group/hybrid courses, including communicating tutor group times and memberships
- Administration of lay ministerial training programmes, including reporting, assessments and accreditation
- With consent, communicating re future courses that may be of interest, based on Hub user activity

Multi-factor authentication (MFA) is enabled for users with a higher level of access via a one-time code sent to email or an authenticator app to ensure the security of data held in Moodle. Users may choose to trust a device for 14 days to reduce repeated verification prompts.

4. What is the legal basis for processing your personal data?

Processing is carried out under different legal bases depending on the circumstances:

Legal Obligation where we are required to meet legal requirements, such as legislation for ministerial accreditation, taxation, charity law,

safeguarding, employment law, health & safety, or church representation/faculty law.

Legitimate Interest to support the collaborative working between ODBF staff and users of the Oxford Learning Hub, and support the learning of Hub users.

5. Sharing your personal data

Your personal data will be treated as confidential. Data held on Moodle is available only to ODBF Moodle administrators and Catalyst, a third-party Moodle host. The Catalyst privacy policy is available here. Data held on Eventbrite is viewable only by necessary ODBF staff, and held as per Eventbrite's guidance. Where consent is given for further communications, names and emails are also held on Mailchimp, as per their privacy guidelines, and are viewable only by necessary ODBF staff.

Email address visibility is disabled across the site, and user email addresses are not viewable by other Learning Hub participants.

Any data used for analytical purposes is anonymised before sharing. Consent can be changed or removed at any time via email.

6. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary.

Our general policy for retention of personal data is a deletion of all user data following two years of inactivity on the Hub, managed by the assigned Privacy Officer.

7. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which the ODBF holds about you;
- The right to request that ODBF corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for the ODBF to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to request the deletion of your Moodle account and all attached usage data;
- The right to lodge a complaint with ODBF and/or the Information Commissioners Office.

8. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

9. Contact Details

To exercise all relevant rights, queries or complaints please in the first instance contact the Data Protection Officer, Church House Oxford, Langford Locks, Kidlington, Oxford, OX5 1GF. Tel:

01865 208200. Email: dpo@oxford.anglican.org.

You can contact the Information Commissioners Office on 0303 123 1113 or via email https://ico.org.uk/global/contact-us/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

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