

## The Rhodes Trust – Scholars Elect and Scholars in Residence

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The Rhodes Trust holds personal records on all Rhodes Scholars from the point at which Scholars are selected (for scholarship application data, please see the separate privacy policy). We keep aspects of these records for varying lengths of time, both electronically and physically. Our principles are simple – we will be transparent about the data we are collecting, where we source those data, how we use the information we hold about you, and the choices you can make.

We collect and process your data for a variety of reasons, not least to maintain a complete and historical record over time. We also collect information necessary for us to assist you in your journey to Oxford, during your time in Oxford, and beyond. We use the information we hold about you to try to ensure that you have an enriching and rewarding time in Oxford and to assist with behind-the-scenes administration on your behalf. It also enables us to ensure that when we approach you for reasons other than necessary academic matters, these interactions are respectful, professional, and relevant to you, and are not unwelcome.

If at any point you have questions about this privacy notice, or how we are using your data, please contact us.

### 1. About this privacy notice

The purpose of this privacy notice is to explain how the Rhodes Trust ("the Trust", "we", "our", "us") holds and uses personal data about Scholars Elect and Scholars in Residence ("you"), and how we use it for the purposes of academic administration and improving the Scholar experience. The Rhodes Trust includes both the offices at Rhodes House in Oxford and our international offices, the latter including National Secretaries, selectors, selection committees, and alumni associations.

### 2. What we do

The Rhodes Trust endeavours to ensure that your Scholarship experience is as rewarding as possible, to assist you while you are in Oxford, and to facilitate with establishing and developing lifelong relationships amongst Rhodes Scholars of all generations. We are here to help you stay connected with each other and with the news and events that are important to you.

### 3. The data we collect about you

We collect information about you from a variety of sources including directly from you via correspondence and annual surveys / updates, from the Scholarship and University application forms, from the University's Student Information Systems, the National Secretaries, recognised Alumni Associations, publicly available sources and/or from third parties providing us with services or acting on our behalf.

We may hold and process the following types of personal data about you:

- Biographical information, which may include:
  - name, title, date of birth, gender, marital status, spouse, partner and family details (for example next of kin emergency contact details)
  - where you live and other contact details
  - education history

- your Coming Up biography, your plans for Study at the University of Oxford and your University application forms, progress and outcomes
  
- your academic progress at Oxford University (or any other institution at which you have studied under the Rhodes Scholarship), and research specialism(s)
- extra –curricular interests, pursuits and achievements whilst at Oxford and elsewhere
- employment details, career history, professional activities
- photographs of you - either provided by you, by other Scholars, or taken during events at Rhodes House
- links to your public social media presence e.g. LinkedIn, Twitter, website or blog
- Future plans beyond Oxford; Going Down biographies
- Any additional information held within the University and Scholarship application forms, including scans of identification and nationality/residency documents, certificates and transcripts, your Rhodes personal statement, endorsements, references.
- Details of our ongoing relationship with you and your engagement with us, which may include:
  - feedback on your experience in Oxford, including course, college, accommodation, and Rhodes House
  - Research grant applications
  - records of your personal interactions with us (e.g. correspondence, notes of meetings or conversations)
  - your communication preferences; records of communications you have received from us, including copies of letters, emails or appeal literature sent, and of fundraising activities in which you have been included (e.g. annual fund mailings, telephone fundraising campaigns)
  - your attendance (and that of your guests) on visits to, or at Rhodes Trust events, including details of any payments made, and photographs, audio and video recordings in which you may be included
  - a record of offers of voluntary support you have made, e.g. offers of expertise, advice, mentoring and of volunteer work that you have undertaken on behalf of the Rhodes Trust
  - Financial needs (during your time in Oxford) and bank details for stipend (and other) payments
  - membership of social media groups e.g. Twitter, LinkedIn
  - your relationship to relevant trusts, foundations and corporates, e.g. membership on board of Trustees
  - data obtained through cookies and similar technologies. These help us understand how you interact with our website (see cookie policy below).
  
- Sensitive personal data, which may include:
  - Physical and mental health information (usually divulged by you), including any medical conditions. We may use health information provided by you so we can make reasonable adjustments to improve the service we are able to offer you and to support your wellbeing while attending Oxford.
  - Although we do not collect these for our own purposes, the following attributes may be inferred from data we do hold: race or ethnicity, religious beliefs, sexual orientation, political convictions. (NB the outreach data completed in the Scholarship and University

application forms are not linked back to individuals). Such information may be inferred from other data we hold, for example, your relationships, volunteer roles, membership of certain Scholar groups, job titles, donations to specific causes or interests. We may obtain these types of data if you have made them public or if you give them to us, for example when writing a blog post on the Rhodes Scholar Network or when you register for an event.

#### 4. How we use your personal data

Your personal data are used in the following ways:

- to assist with your applications to the University of Oxford – at your request we share with the University references that were submitted as part of your Scholarship application. We will also need to use your personal data to have conversations with members of the collegiate University to progress your applications.
- with your permission, we publish a photograph and bio (usually written by yourself) on the Rhodes House website.
- with your permission, we may use photographs of you in public-facing material – e.g. on the website, in printed material, or in social media posts
- we will contact you about events and opportunities that may interest you
- in liaison with you, we may deem it necessary to use your health information to orchestrate additional care for you while you are in Oxford, this may include conversations with relevant members of the collegiate university
- we may connect you to Scholars Elect / current Scholars / senior scholars in order to facilitate the sharing of experience and guidance necessary for university applications and the making of future plans

***If you do not wish your data to be used in any of the ways listed above, or have any questions, please contact us on [data.protection@rhodeshouse.ox.ac.uk](mailto:data.protection@rhodeshouse.ox.ac.uk).***

#### 5. When and how we share your data

We will, from time to time, share your personal data with the Rhodes Scholarship National Secretaries (and offices) and Selection Committee members, recognised Rhodes Alumni Associations or with third parties working on our behalf (for example the Rhodes Scholar Network provider), whether inside the EEA or outside. We will only do this in appropriate circumstances, by secure means, and with the relevant data sharing agreements in place. We do not, and will never, sell your data.

Third parties will only process your personal data on our instructions and where they have agreed to treat your data confidentially and to keep it secure – in line with the General Data Protection Regulation. We only permit them to process your personal data for specified purposes on behalf of the Rhodes Trust. We do not allow our third-party service providers to use your personal data for their own purposes nor to keep your data after work agreed with the Trust is complete or beyond agreed retention timelines. All of our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies.

Whenever your information is shared, we will always seek to share the minimum amount of information necessary to fulfil the purpose.

Your data may also be shared in the following ways:

a. With other Rhodes Scholars and with Rhodes House Staff

With your consent, we will share your information with other Rhodes Scholars in the form of a contact list - sharing your name, photograph, Rhodes identifier, email address, year of tenure, course of study and college. This is shared only with current Rhodes Scholars, Rhodes Scholars Elect, Scholars still in Oxford and with the staff at Rhodes House.

Your data will only be shared with Rhodes House staff where there is a genuine and justifiable need to do so.

b. With members of the University of Oxford

In order to assist your placement on course and in a college, we may need to have conversations on your behalf that could constitute the sharing of personal data. Most of this will be contained within your application form, to which these members of the University will usually have access. In addition, we may upload, at your request, references submitted as part of your Rhodes Scholarship application. We will need to confirm that you are a Rhodes Scholar and that you will be funded by the Rhodes Scholarship in order to complete the financial conditions of any offers of study made to you by the University. As part of your application to the University of Oxford, you will have the opportunity to agree to Rhodes House acting as a third party on your behalf.

c. With volunteers working on behalf of the Rhodes Trust

We provide feedback to National Secretaries to enable them to maintain and improve selection standards. This may include a summary of your progress in Oxford, including whether your experience is achieving what you and they intended at selection.

d. Rhodes Scholar Network and the Rhodes House website

If you are a Rhodes Scholar, unless you request otherwise, a basic profile will be set up for you on the Rhodes Scholar Network with your name, election region and year. This profile will remain inactive until you access the Network for the first time. You will have the option to build up your profile with additional information, so that it may be searchable by your fellow Rhodes Scholars. It is possible to manually change your settings to show more or less information on your profile.

With your consent, your Coming Up biography and photograph will be published on the Rhodes House website; in addition, you will be added to the online scholar search tool of all Rhodes Scholars over time. With your consent, your Going Down biography, email address and photograph will be published in a password-protected area of the Rhodes House website. Aside from photographs and videos, any additional online content containing information about you will be used with your permission.

e. With third-party organisations engaged by the Rhodes Trust to provide services

For example, technical teams working on the Rhodes Scholar Network may have access to your data in maintaining the platform on behalf of the Trust.

## 6. Our legal basis for processing your data

We will only process your personal data where the law allows us to do so. Most commonly we rely on the following legal bases for processing your personal data:

- Where we have a legitimate interest to do so for purposes listed within this privacy notice. Where we use legitimate interest as the basis for our processing we will carefully consider each of the ways we process your data to ensure that we carry out our activities with a focus on your interests, and in the most efficient and effective way.
- Where we need to undertake the services that we provide to you. Information processed for this purpose includes, but is not limited to, the information you provide when you apply for the Rhodes Scholarship, register for an event, or to enable us to process a donation.
- Where we are required to comply with our legal obligations for example with respect to The Charity Commission or the Information Commissioner's Office in relation to audits or official investigations.
- Where your consent is required, for example where sensitive personal data is recorded. For any processing that requires your prior consent, you can withdraw your consent at any time and the Trust will cease the activity.

## 7. Change of purpose

We will only process your personal 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 personal data for an unrelated purpose, we will notify you or ask permission, as relevant, if the former, we will explain the legal basis which allows us to do so. Please note that we may process your data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

In 2012, the Rhodes Trust created a volunteer network of Rhodes Scholar Class Leaders, inclusive of all constituencies and Rhodes class years that works cohesively to strengthen the connectivity among Scholars around the globe. Class Leaders are required to sign a confidentiality agreement, prior to being provided with a list of contact details for Scholars in their class. The Class Leaders are volunteers from each year group, who function as a liaison between their Rhodes Class and the Rhodes Trust.

Once you are no longer in residence in Oxford this Privacy Notice will be superseded by a separate privacy notice for Alumni, Donors and Supporters, [this notice can be found here](#).

## 8. International transfers

The Rhodes Trust operates internationally. Most of the personal data we process for current Scholars and Scholars Elect stays in the UK although some users from the Rhodes Trust, including Rhodes House staff within our international offices (including National Secretaries and Selection Committee members), may access your personal data held in our IT systems and platforms, including those from outside the European Economic Area (EEA). We may also share data with recognised Alumni Associations, consultants, service providers and others working on our behalf outside the EEA. In all cases we will make sure transfers are made securely, subject to appropriate safeguards.

## 9. Data security

The Rhodes Trust takes the security of your data very seriously and we have appropriate security measures in place to prevent your personal data from being accidentally lost or misused. Access to your personal data is limited to those employees, contractors, volunteers and other third parties who have a need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

## 10. How long we keep your data

The Rhodes Trust considers its relationship with Rhodes Scholars, donors and supporters to be life-long and we will retain much of your data indefinitely unless you request otherwise. When we no longer need to retain personal information, we ensure it is securely disposed of. We will also keep anonymised statistical data indefinitely. Some Scholar data is only retained temporarily; please contact the Scholar Affairs Office for further information on our retention policy ([scholar.affairs@rhodeshouse.ox.ac.uk](mailto:scholar.affairs@rhodeshouse.ox.ac.uk)).

## 11. Your legal rights

Under certain circumstances, you have the right to:

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

Request erasure of your data. This enables you to ask us to delete or remove your data where 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). 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 to establish its accuracy or the reason for processing it.

Request access to your personal 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.

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 if we were to stop. However, where you have consented to the processing, you can withdraw your consent at any time by emailing [data.protection@rhodeshouse.ox.ac.uk](mailto:data.protection@rhodeshouse.ox.ac.uk). In this event, we will stop the processing as soon as we can. If you choose to withdraw consent it will not invalidate past processing.

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, please contact us at [data.protection@rhodeshouse.ox.ac.uk](mailto:data.protection@rhodeshouse.ox.ac.uk). We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR (General Data Protection Regulation 2018). 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 Information Commissioner's Office at the ICO website: <https://ico.org.uk/>.

## 12. Contact us

If you have any questions about this privacy notice or about your personal data, or if you want to provide updates to your data or exercise any of your rights as outlined above, please use the details



below, and quote your name and, if you are a Rhodes Scholar, your Rhodes identifier – ('Election country/region', 'College' & 'Election year'):

The Rhodes Trust  
Rhodes House, South Parks Road  
Oxford, OX1 3RG, United Kingdom  
Email: [data.protection@rhodeshouse.ox.ac.uk](mailto:data.protection@rhodeshouse.ox.ac.uk)

***We reserve the right to update this privacy notice at any time. Any changes to this privacy notice will be posted to this page.***