

## The Rhodes Trust – Scholarship Applicants Privacy Notice

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The Rhodes Trust holds personal records on those who apply for the Rhodes Scholarship. Our principles are simple—we will be transparent about what data we are collecting about you, where that data comes from, how we use the information we hold about you, and the choices you can make.

The overarching purpose of collecting and processing your data is ensure that the selection process is fair and balanced, giving our selection committees the best possible starting point for choosing the best possible candidates.

If at any point you have questions about our 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") processes personal data contained within Rhodes Scholarship applications and how it will be used, distributed, stored, and destroyed. The Rhodes Trust includes the central offices at Rhodes House in Oxford, our National Secretaries, and our selection committees.

### 2. The data we collect about you

Most of the personal data we process is provided by you in your application for a Rhodes Scholarship. We also receive data from your nominated referees.

The data we collect about you include:

- Biographical information, which may include:
  - Contact details
  - Education and employment history (including scanned / digital exam transcripts and degree certificates)
  - Scans of identification and nationality / residency documents (e.g. passport, birth certificate, certificate of legal permanent residency)
  - Personal data (gender, nationality, birthplace, residency timeline)
  - Nationality of parents / guardians
- Rhodes personal statement (essay) plus study intentions.
- Photograph
- Endorsements and references (including endorser and referee contact details)
- Outreach monitoring data, which may include:
  - educational background of parents
  - private vs. public education
  - owned / rented family home
  - ethnicity
  - religion
  - differing abilities
  - English as first language

- Sensitive personal data, which may include:
  - health information, 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 look after your wellbeing while studying in Oxford.
  - race or ethnicity and religious beliefs – we use these types of data to monitor the effectiveness of our outreach. You are not required to give this information and may choose not to do so.
  - we do not generally seek to obtain other categories of sensitive data however, they may sometimes be inferred from other data we hold, for example, your relationships, job titles, support of specific causes, or interests. We may obtain these types of data if give them to us in your application.

### **3. How we use your personal data**

We use your personal data for the following purposes:

- to inform the selection process
- to contact you, if necessary, during the application and selection processes
- to obtain feedback from your nominated referees
- to compile application statistics
- to inform our outreach efforts

### **4. When and how we share your data**

Your application data is primarily held on our application system (Embark) in the USA. The National Secretary, selection committee members, shortlisting assistants, and administrators from each constituency have access to the applications made to their constituencies. They will access that data via the application system and may download it locally to support the selection processes.

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. We only permit them to process your personal data for specified purposes. We do not allow our third-party service providers to use your personal data for their own purposes nor to keep your data after the processing is complete. All 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.

### **5. Our legal basis for processing your data**

We will only process your personal data where the law allows us to do so. For the purposes of your application, we rely on your consent, as given by the clear and affirmative action of you submitting the application, for the purposes stated in this privacy notice. If you withdraw your consent, or withdraw your application in any other way, we may keep parts or all of your application data.

#### **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 and 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.

## **6. International transfers**

We may share your data with the National Secretary, selection committee members, shortlisting assistants and administrators in the constituency to which you applied. This may involve a transfer of your data outside the EEA. In all cases we will make sure transfers are made securely, to countries deemed adequate by the European Commission and/or subject to appropriate safeguards and confidentiality agreements.

## **7. 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 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.

## **8. How long we keep your data**

The data contained within Rhodes Scholarship applications will be retained by the Rhodes Trust for a period of seven years after the end of the application round in which the application was created (this is the potential length of eligibility of a candidate for a scholarship). Following seven years the data will be permanently deleted with only non-identifying summary statistics remaining.

For successful Rhodes Scholarship applications, the applications will be retained by the Rhodes Trust, digitally and physically, indefinitely. The applications will be removed from the Embark application platform after seven years.

## **9. Your legal rights**

Under certain circumstances, you have the right to:

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.

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).

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 us to establish its accuracy or the reason for 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 us. 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. **Please note if you do not supply the information required in your application form or if you ask us to stop processing your data, we may not be able to assess your application and may have to reject it.**

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. 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.

## 10. 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:

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.