



**Westfield House**  
*Cambridge*

30 Huntingdon Road  
Cambridge CB3 0HH  
United Kingdom  
Tel: +44 (0) 1223 354 331  
Fax: +44 (0) 1223 355 265  
www.westfieldhouse.org.uk

## Data Protection: Westfield House Privacy Notice

### What does this Privacy Notice cover?

1. In order to process student applications, provide services to students, alumni and supporters, and to meet legal requirements, Westfield House needs to maintain and process personal data such as name, address, date of birth, course(s) studied, fee payments, donations, information about examinations, assessments and course results.
2. From 25<sup>th</sup> May 2018 the EU General Data Protection Regulation (GDPR) superseded the UK Data Protection Act 1998 (DPA) to regulate the processing of personal data in any format by Westfield House, including digital, hard copy personal data and all other formats. GDPR provides individuals with enhanced rights and imposes increased responsibilities on organisations processing personal data.
3. This Privacy Notice explains how Westfield House collects, handles and uses the personal data we collect about our students, alumni, residents and our past, current and future supporters, whether donors, volunteers, members of our support groups such as Friends of Westfield House, attendees at events we organise or at which we exhibit and others who have requested to be on our mailing list. It will be provided to students at the application and registration stages and to new supporters when they sign up at events or contact us or make a contribution to Westfield House. It includes information about how student, alumni, resident and supporter data is used, and when it is shared with other external parties.
4. "Personal data" is defined by the UK Information Commissioner's Office as "any information relating to an identified or identifiable natural person". In other words, it includes any information about a living individual which allows them to be identified from that information (examples might be your name, a photograph of you, your email address). Identification can be by the information alone or when it is combined with any other information. The processing of personal data is governed by the UK Data Protection Bill 2017-19<sup>1</sup> and the General Data Protection Regulation (EU) 2016/679 (GDPR).
5. Where in this statement we refer to 'we' or 'our' or 'us' we are referring to Westfield House and where we refer to 'you' or 'your' we are referring to our alumni, residents, members and supporters.
6. A description of what data is processed and for what purposes is set out in this Privacy Notice. This Privacy Notice is sent to you by Westfield House on our own behalf and on behalf of each of the data controllers listed in paragraph 8. In the rest of this Privacy Notice, we use the word "we" to refer to each data controller, as appropriate.

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<sup>1</sup> This bill, which will incorporate GDPR, is still going through the UK parliament.



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## Who are we?

7. Westfield House is the House of Theological Studies of the Evangelical Lutheran Church of England (ELCE) which is a registered charity in England and Wales (registered number 220466) and in Scotland, via ELCE Trust Ltd (registered number SC041204). Westfield House is a member of the Cambridge Theological Federation and an Affiliate Teaching Centre of the University of London.
8. A number of different people work together to deliver the mission of Westfield House (our “partners”), including:
  - Westfield House faculty and staff;
  - Faculty and staff of the Cambridge Theological Federation;
  - Faculty and staff of University of London;
  - Faculty and staff of partner educational institutions and partner church bodies around the world;
  - Members of the governing body of Westfield House;
  - The Friends of Westfield House;
  - Staff of the Hilda E Bretzlaff Foundation;
  - Staff and agencies of UKVI;
  - Staff of our accrediting body, British Accreditation Council.
9. As administration and teaching within Westfield House, as well as communication with alumni and other supporters, are the responsibility of all these persons and groups working together, we may need to share some of the personal data we hold with them so that they can carry out their responsibilities to Westfield House, as well as to comply with UK and USA legal requirements (for example, immigration; safeguarding; tax returns). Your personal data will be treated as strictly confidential. It will only be shared with our partners where it is necessary for the performance of our tasks or where you first give us your prior consent.
10. The people/groups referred to above are joint data controllers. This means we are all responsible to you for how we process your data.
11. Any transmission of data to or from our partners is managed through agreed processes that comply with relevant data protection legislation. Each partner has its own data protection statement and procedures.
12. The person at Westfield House responsible for Data Protection Compliance is:  
Westfield House Principal, Dr Cynthia Lumley ( [principal@westfield.cam.ac.uk](mailto:principal@westfield.cam.ac.uk) ) ; 01223 354331



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## Principles

13. Westfield House processes personal data in accordance with the principles of GDPR. In particular, we will make sure that all personal data is:
- a) processed lawfully, fairly and in a transparent manner;
  - b) processed for specified, explicit and legitimate purposes and not in a manner that is incompatible with those purposes;
  - c) adequate, relevant and limited to what is necessary for the purposes for which it is being processed;
  - d) accurate and, where necessary, up to date;
  - e) not kept longer than necessary for the purposes for which it is being processed;
  - f) processed in a secure manner, by using appropriate technical and organisational means;
  - g) processed in keeping with the rights of data subjects regarding their personal data;
  - h) not transferred outside the European Union, to countries without adequate protection unless the consent of the data subject has first been obtained.

## What we do with your data

14. Westfield House holds your personal data (including, where relevant, sensitive personal data such as the details of your health and any disability if you apply to Westfield House and/or register for accommodation with us or where it is necessary to enable you to study at Westfield House; your religious affiliation and domicile) for a number of interdependent purposes, including:
- To perform all services and processes relating to students, including student recruitment, admission, registration, teaching and learning, examinations, graduation, academic transcripts and other records, grant applications, pastoral and physical care;
  - To provide services (such as accommodation) to residents, supporters and donors;
  - To promote the interests of Westfield House by managing alumni, member and supporter relations, through communications, event management and fundraising;
  - To fulfil our legal, contractual and pastoral obligations as a teaching institution and as a Landlord. (e.g. retaining proof of your right to study or live in the UK; recording donations for UK Gift Aid or USA tax relief);
  - To maintain our accounts and records.
15. Only information required for these purposes is obtained and processed, and without it Westfield House may not be able to provide its services.
16. Our processing also includes the use of CCTV systems for the prevention and prosecution of crime.



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## What information is processed?

17. We may hold information relating to you from a number of sources. A significant proportion of the information we hold is that which you provide to us (for example, on student application forms, any other supporting documents requested as part of your admission, details provided by your home institution, church body, or referees; you may give us information by filling in forms at events, when you register for accommodation or send a donation or by corresponding with us by telephone, email or otherwise).
18. Records may contain:
  - your name and contact details (updated whenever you let us know, or we find out, that they have changed);
  - unique personal identifiers (e.g. student numbers) and biographical information (e.g. date of birth);
  - details of your education, both at Westfield House and at other institutions (e.g. your home institution(s), the modules and courses you have completed, dates of study);
  - details of your interactions with us, including:
    - your grades, samples of marked coursework, academic transcripts;
    - your attendance at our events (including class attendance);
    - other contact with us or our partners;
    - details of benefits and services provided to you;
    - your key relationships with other alumni, members or supporters of Westfield House;
  - details about your family (e.g. your marital status, the name(s) of your partner, spouse, next of kin);
  - personal data provided by you for specific purposes (e.g. disability, medical condition, medication in order to provide care, help or suitable adjustments; and dietary preferences/requirements for event management purposes);
  - your communication preferences, to help us provide tailored and relevant communications;
  - photographs, which are used to help in promoting the mission of Westfield House.
19. Where applicable, we also record, based on information which you provide to us and, in some cases, publicly available information and information from our partners (as listed below):
  - financial information relating to you and any of your key relationships (including your history of donations to Westfield House) and other support that you provide (e.g. volunteering);
  - your career highlights and other life achievements;
  - information about your areas of interest and extra-curricular activities;
  - your religious affiliation and details of your home congregation;
  - your internet use whilst resident in Luther Hall.



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20. We augment the data we hold with data from our partners (as listed below) and publicly available data. We may search the following websites (either directly or using search engines), where relevant, in order to obtain and maintain the accuracy of the data listed above:

- In the UK: Companies House; Charity Commission; Company websites; Church websites; Sunday Times Rich List;
- In the USA: Guidestar, Company websites, Church websites, University and Seminary websites; LCMS Locators;
- Press sources; Websites of national and international religious organisations.

### **How do we process your personal data?**

21. Communications to you may be sent by post, telephone or electronic means (including email and social media), depending on the contact details we hold and the preferences expressed by you about the types of communications you wish to receive.
22. We may use automated or manual analyses to link data together to help us identify your potential for supporting us, to provide you with an improved experience, to send you communications which are relevant and timely, to identify volunteering opportunities or opportunities for providing support which may be of interest to you, and to avoid approaching you with opportunities which are not of interest. All of this enables us to raise more funds, sooner, and more cost-effectively, in support of our strategic objectives. We always seek to ensure that any opportunities we present are aligned with your interests, based on the research we conduct.
23. The data controllers will comply with their legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data.

### **What is the legal basis for processing your personal data?**

24. Most of our data is processed because it is necessary for our legitimate interests, or the legitimate interests of a third party. An example of this would be our safeguarding work to protect children and adults at risk. We will always take into account your interests, rights and freedoms.
25. Some of our processing is necessary for compliance with a legal obligation. For example, we are required to keep records of all donations for which Gift Aid will be claimed; and to keep proof of right to reside or study in the UK for anyone who is not an EU national.
26. We may also process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract. An example of this would be processing your data in connection with the hire of church facilities.

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Registered Office: 28 Huntingdon Road, Cambridge CB3 0HH, England, UK.



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27. Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details.
28. Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.
29. If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us using the details listed below.
30. We will always respect a request by you to stop processing your personal data, within any applicable legal constraints and academic obligations, and in addition your statutory rights are set out below.

### **How we protect your data**

31. We ensure we have appropriate data sharing arrangements in place before sharing your personal data.
32. We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them.
33. We also facilitate communication between individual alumni, members and supporters, but in doing so we do not release personal contact details without prior permission.

### **Transfer of Data Abroad**

34. In the course of fulfilling our obligations as an educational institution, we may need to transfer data abroad in order to:
  - Provide academic transcripts as required by students;
  - Submit grant applications on behalf of students.
35. In addition, we may also need to transfer data abroad when providing a letter of reference. We will only do this in response to a written request from you.
36. Any electronic personal data transferred to countries or territories outside the EU will only be placed on systems complying with measures giving equivalent protection of personal rights either through international agreements or contracts approved by the European Union.
37. Our website is also accessible from overseas and we send our newsletter, "Westfield Windows" as well as the ELCE magazine, "The British Lutheran" overseas which means that, on occasion, some personal data may be accessed from overseas. (Our pages may contain links to other websites, and you should be aware that we are not responsible for the privacy practices on other websites.)





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## Further processing

38. If we wish to use your personal data for a new purpose, not covered by this 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.

## Your rights and your personal data

39. You have the following rights with respect to your personal data<sup>2</sup>:

- i) The right to access information we hold on you
  - At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we obtained the information from. Once we have received your request we will respond within one month.
  - There are no fees or charges for the first request but additional requests for the same data may be subject to an administrative fee.
- ii) The right to correct and update the information we hold on you
  - If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- iii) The right to have your information erased
  - If you feel that we should no longer be using your data or that we are using your data illegally, you can request that we erase the data we hold.
  - When we receive your request we will confirm whether the data has been deleted or the reason why it cannot be deleted (for example because we need it for our legitimate interests or regulatory purpose(s)).
- iv) The right to object to processing of your data
  - You have the right to request that we stop processing your data. Upon receiving the request we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.
- v) The right to data portability

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<sup>2</sup> When exercising any of the rights listed below, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before you can exercise these rights.



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- You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
- vi) The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.
- You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
- vii) The right to object to the processing of personal data where applicable.
- viii) The right to lodge a complaint with the Information Commissioner's Office:  
<https://ico.org.uk/concerns/>

### **Further information**

40. We will retain some of your data (such as contact details, academic records, details of donations) indefinitely in support of your lifelong relationship with us or until you request us to do otherwise.
41. We will publish any changes we make to this data protection statement and notify you by other communication channels where appropriate.
42. Please contact the Principal of Westfield House ( [principal@westfield.cam.ac.uk](mailto:principal@westfield.cam.ac.uk) ) if you have any concerns or questions about the above information or you wish to ask us not to process your personal data for particular purposes. Where you have specific requests relating to how we manage your data, we will endeavour to resolve these, but please note that there may be circumstances where we cannot comply with specific requests.