

Introduction

The University, as part of its day-to-day business, handles and collects data from those making enquiries about and applying to the University: enquiry data is provided by the person making the enquiry, whereas applicant data may be both collected by the University (via UCAS) and provided by the Applicant. The process for dealing with this data is outlined below.

Data refers to the information that we hold about you from which either on its own or in combination with other information you can be identified and may include names, contact details, photographs, identification numbers, online identifiers, biometric information, and expressions of opinion about you or indications as to our intentions about you.

"Processing" means doing anything with your Data, such as collecting, recording, or holding the Data as well as disclosing, destroying, or using the Data in any way.

This notice may be amended from time to time; the current version will at all times be available on our website.

This notice covers:

- [Why do we hold your data](#)
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1 Why do we hold your data?

- 1.1 In order to provide you with the information you have requested and to process your application to study at the University, we have to maintain accurate and up-to-date records of your personal information. We will only hold sensitive information such as details about your racial or ethnic origin or health with your consent and because it is needed to either fulfil our obligations to you or to comply with legal requirements.
- 1.2 We may process your personal data because it is necessary for the performance of a contract with you. This includes:
 - interacting with you before you are enrolled as a student, as part of the admissions process;
 - dealing with any concerns or feedback you may have.
- 1.3 We may also process your personal data for our compliance with our legal obligations. This includes meeting our compliance and regulatory obligations.

- 1.4 At times, we will process your personal data because you have given your specific or, where necessary, explicit consent for us to do so. This includes contacting you about your enquiry and sending you information about the University and its courses.
- 1.5 When you are booking an event, or making a general enquiry, we may also ask for data about your parents, such as name and email address. We do this so that we can send them practical information about attending the event, and general information about what the University offers. We will not send them information about you or your application.
- 1.6 We retain some data for statistical monitoring purposes. Where practical, this will be anonymised.
- 1.7 From time to time, we may also invite you to provide feedback on your experiences to help us improve our services.
- 1.8 Appendix A details the purposes for which we may use your personal data.

2. How we collect your data

We collect data about you in a number of ways, including:

- from the information you provide to us when you interact with us before making an application, for example when you request information about a course or a prospectus;
- when you submit your application to study at AUB either direct or via UCAS;
- when you communicate with us as part of the admissions process;
- from third parties, for example from your previous or current school, sixth form college, agent, university, or employers who may provide a reference about you or who may sponsor your studies.

3. Rights and duties

- 3.1 It is your responsibility to ensure that the details you give us are accurate and kept up to date. This is particularly important in relation to your correspondence address and mobile phone number – do not forget to tell us if these change.
- 3.2 The data which you provide when making an enquiry or during the application process or in any later data requests will be processed in accordance with the UK General Data Protection Regulation (UK GDPR). It will only be used by the University for the conduct of its legitimate business.
- 3.3 We will not normally divulge any personal or sensitive information to anyone else (including parents) without your permission.
- 3.4 The University is registered with the Information Commissioner's Office, the UK's independent body responsible for upholding information rights. Our registration number is Z5476912.

4 Under 18s

- 4.1 If you are under the age of 18, we have additional responsibilities in processing your data.
- 4.2 The University has a specific policy statement for under 18s that forms part of our Admissions Policy. This requires your parent or legal guardian to sign a declaration in order for us to process your application. If you are an international student who requires a Student Route visa to study in the UK, there will be additional requirements for those under 18 in order to comply with the Immigration Rules and the University's responsibilities as sponsor.
- 4.3 Under the law, under-18s are considered children. You can read more about children and data processing [here](#)

5 Passing information to third parties

- 5.1 We may need to share your Data with third parties to comply with the University's legal obligations, such as reporting to Government and regulatory bodies such as the Office for Students and the Higher Education Statistics Agency/JISC, or to respond to lawful requests from other relevant educational providers.
- 5.2 If you require a Student Route visa to study in the UK, we will share your personal data with UK Visas & Immigration (UKVI) in the process of issuing the CAS (Confirmation of Acceptance for Studies) that you need for your visa application, in ensuring the application progresses appropriately and in dealing with any queries relating to your immigration history.
- 5.3 From time to time, the University may need to outsource support functions, primarily related to IT. This will be done with specific suppliers with which the University has strict agreements, and access will only be granted when required.
- 5.4 Data may also be passed to other agencies in accordance with our statutory requirements; under no circumstances will your data be passed to an agency which does not subscribe to the UK General Data Protection Regulations, be sold to a third party, or otherwise used for profit. Where we use service providers based outside the EEA, we may use specific contracts or frameworks approved by the Information Commissioner's Office which give personal data the same protection it has in Europe, such as the IDTA/Binding Corporate Rules/EU-U.S Data Privacy Framework.
- 5.5 For details of the above agencies and other parties data may be shared with, see Appendix B. The appendix may be updated on an annual basis.

6 Marketing

- 6.1 The University uses Customer Relationship Management systems (CRM) in managing enquiries and applications. These systems are delivered by third parties and processing of data partly takes place outside of the UK and the EU. The University has strict agreements in place to control and limit the use of data within this system.
- 6.6 You may be filmed or photographed while attending open days, offer holder days or other events. If you do not want to be filmed or photographed, you must make your views clear at the time the filming or photography is taking place.
- 6.7 Individuals under 18 will **not** be filmed or have their photo used without written permission from parents or guardians.

7 Retention

We will retain your applicant record for up to five years after the application was made. If you accept an offer to study at the University, your data will be processed in line with our [Privacy Notice for Students](#) and the retention periods associated with this. Enquiry records will be kept for one year following the start of the next academic year.

8 Your rights

- 8.1 Under the UK GDPR you have a right to (subject to 8.3 below):
- request access to, and copies of, the personal data that we hold about you;
 - raise an objection where the processing of data we hold about you is likely to cause you damage or distress.
 - require that we cease processing your personal data if the processing is causing you damage or distress;
 - require us to correct the personal data we hold about you if it is incorrect;
 - require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal, or require us to delete your data);
 - stop us from sending you marketing communications.
- 8.2 To read more about your rights, please visit the [ICO website](#)
- 8.3 To exercise these rights or if you require any further information or have any queries, please contact the Data Protection Officer dp@aub.ac.uk. You should note that there is some data which we are legally required to hold, and you cannot exercise a 'right to be forgotten' in respect of this data.
- 8.4 The University's Data Protection Policy can be accessed through the student portal, MyAUB or by request to dp@aub.ac.uk

Appendix A

The purposes for which we may use personal data (including sensitive personal data) we collect from and in relation to enquiries and applications include:

Enquiries:

- sending you information about the University and specific courses you have enquired about, including a prospectus and promotional materials;
- sending you information about open days, offer holder days and other relevant events;
- recruitment activity;
- maintaining enquiry records;
- maintaining a record of any disabilities you have disclosed;
- monitoring equal opportunities;
- managing the use of social media;
- other administrative purposes, including:
 - research and statistical analysis;
 - audits (e.g. to ensure compliance with our regulatory and legal obligations);
- promoting our services (e.g. providing information about summer schools or events);
- dealing with complaints and enquiries.

Applications:

- all of the above, plus;
- general admissions processes;
- maintaining applicant records;
- establishing your fee status for studying in the UK;
- determining your right to study in the UK, including your immigration status if you are not a British national;
- issuing the CAS for any sponsored visa students;
- assessing your eligibility for bursaries and scholarships, etc.;
- managing student accommodation enquiries and applications.

Appendix B - Organisations we may share information with

UCAS

The University both receives and shares data with UCAS. Data sharing (where the University sends applicant data to UCAS) is limited to applicants who apply for their course directly to the University and to update decisions for all applicants.

You can find UCAS' Privacy Policies [here](#).

Derwent FM/Student Roost

The University offers accommodation for students across three different sites. Two of these, Campus Halls and Madeira Road are managed by Derwent FM. The third, Home Park, is managed by Student Roost. In order to facilitate bookings and the general management of these sites, some personal data will be shared with the management companies.

Derwent FM has published their Privacy Policy [here](#); Student Roost [here](#).

Student Loans Company

In order to properly administer student loans, the University will receive personal data from the Student Loans Company. This data will be both processed by the University and reshared with the Student Loans Company. This only applies to students who are eligible for, and are accessing, student loans via Student Finance England.

Other Funding Providers

The University has an obligation to share certain data with other funding providers such as the NHS Student and Social Work Bursaries, US Department of Education, Department of Veteran's Affairs etc. This data forms part of the agreement you make with your funding provider at the outset.

UK Visas & Immigration

For overseas applicants who require sponsorship only. The University has Student Route Sponsor status and has a responsibility to keep certain personal information on sponsored applicants. In certain circumstances, for example as part of the CAS issuing process, it is required to share this information with UK Visas & Immigration (UKVI). Records will be kept as required by paragraphs 2.1 to 2.12 of the Student Sponsor Guidance: [Sponsorship Duties](#).

Partners and collaborators

From time to time, the University collaborates with other educational providers in delivering courses. Our current partners are listed below:

- [Bournemouth and Poole College](#) (BPC)
- [Ruskin Mill Trust](#)
- [ThinkSpace Education](#) (TSE)
- [British University Vietnam](#) (BUV)
- [DING](#)
- [City & Guilds of London Art School](#) (CGLAS)

The information you provide as part of your application will be shared with the relevant partner in order to facilitate your studies and maintain your applicant record.

Data will be processed in line with this privacy notice, and, where relevant, the University's [privacy notice for students](#).

Apprenticeships

If you apply for an apprenticeship through AUB, the information you provide as part of your application will be shared with your employer in order to facilitate your apprenticeship.

Agents and other third parties

If you are applying through an agent, the University will communicate with your agent, share information with them, and copy them on communication with you, as required to progress your application and any offers made. We will also, within reason, respond directly to queries that your agent raises in relation to your applicant record with the University.

From time to time, you may have help from a school counsellors or other relevant staff from your school or college submitting your application. If you include this person's name as a nominated contact on your application, we may share information with them. If you do not have a nominated contact, we would only share general information about the course or the university with your school or college.

Customer Relationship Management (CRM) solutions

The University uses a CRM solution to help manage its enquiry data and applicant communications. In order for this to fulfil its purpose, the University will share some personal data with the third parties administering these solutions. The University uses Azorus for this purpose.

You can read more about Azorus [here](#). Data will be processed in line with this privacy notice, and, where relevant, the University's [privacy notice for students](#).

Auditors

Universities have a statutory obligation to be audited each year by a registered statutory audit firm. In addition, to ensure that the University has good corporate governance in place a registered audit firm also carries out internal audits. It is sometimes required that applicant data is shared or viewed by the auditors to ensure that a thorough audit can be completed.

Payment System Providers

To allow applicants to make online payments the University shares personal data with their payment system provider, currently WPM. The sharing of this data allows for applicants to be correctly identified at the point of payment. The data shared includes Student ID, date of birth and invoice data.

Software services

We use a number of suppliers who process personal information on our behalf. These include suppliers of software services. These act strictly on our instructions and must not use the information for their own purposes.

Service providers

From time to time, we will use service providers acting as processors, some of which may be based outside the UK and the EEA. These providers may deliver IT and system administration services such as Google Analytics and Data Studio, Google AdWords and DoubleClick and social media platforms.