**Student Personal Data Use**

*Last Revised 31 December 2018*

We are a data processor for personal data relating to your participation in our education abroad program.

“Processing” means any operation which we carry out on your personal data e.g. obtaining, storing, transferring, deleting.

This notice explains how we will process your personal data.

“Personal data” refers to information relating to a living, identifiable individual. It can also include "special categories of data", which is information about racial or ethnic origin, religious or other beliefs, and physical or mental health, the processing of which is subject to strict requirements. Similarly, information about criminal convictions and offences is also subject to strict requirements.

*Your personal data*

We hold a range of personal data about you, some of which your home university provides to us directly and some of which we receive from you as well as other parties where relevant (see below for further details of personal data we receive from other parties). Examples of categories of personal data which we hold are: student contact details, prior educational experience/attainment, immigration information (e.g. passport details, language proficiency), where relevant, health information (including any disabilities) and other equality-monitoring data you, your home university, or other parties provide to us. In addition we may process data about your academic performance, attendance and progression, and where relevant, breaches of our policies (e.g. academic or other misconduct). We also process contact and educational details after you have completed your program or your activities with us are otherwise terminated.

In general terms, we process your personal data for the purposes of providing our academic and/or internship programs and related services.

We only process data for specified purposes and if it is justified in accordance with data-protection law. The table below lists the various purposes for which we process your personal data and the corresponding justification for it. Some processing of your personal data is justified on the basis of contractual necessity. In general, this applies to data you or your home university provides to us to process your application and if enrolled, to monitor academic performance. **Without that information we would be unable to provide you with your chosen academic program and related support services**. Some personal data is also required to fulfill our legal obligation regarding immigration. A failure to provide that information could prejudice visa applications.

*The purposes for which we process your personal data and the legal basis*

**PURPOSE LEGAL BASIS/JUSTIFICATION**

|  |  |
| --- | --- |
| Assessing eligibility to undertake academic and/or internship programmes. | Consent and/or processing is necessary for the purposes of taking steps prior to entering into a contract with us. |
| Provision of academic and/or internship programmes and related services (including IT and library services). | Necessary for performing a contract i.e. to provide your chosen academic programme and/or internship (“contractual necessity”). |
| Assessment of academic progress and performance (including attendance). | Contractual necessity. |
| Administration of complaints, grievances and appeals. | Contractual necessity. |
| Immigration matters. | Necessary for us to comply with our legal obligations in relation to students who hold student visas. Such processing may also be in the public interest and your consent may be required in some cases. |
| Making reasonable adjustments for disabilities and providing relevant support to students with ill health. | Consent. |
| Regulating our Academic Solutions community (including dealing with misconduct under our procedures for academic and other misconduct). | Contractual necessity and our legitimate interest in maintaining academic standards. |
| Obtaining payment of fees. | Contractual necessity and our legitimate interest in obtaining payment for the services we provide. |
| Protecting our property and assets (e.g. by dealing with misconduct). | Necessary for our legitimate interest in safeguarding our property and assets. |
| Providing appropriate I.T. and other infrastructure facilities e.g. a virtual learning environment. | Contractual necessity; legitimate interest in providing a proper infrastructure to support the provision of academic and internship programmes and related student services. |
| Communicating with you. | Contractual necessity and our legitimate interest in marketing Academic Solutions and promoting student welfare. |
| Assisting you to obtain residential accommodation/housing. | Consent. |
| Alumni relations. | Necessary for our legitimate interests in marketing, fundraising and maintaining an alumni network. |

There may be other processing in addition to the above, for example, when you access our website or when we take photos of our events and publish them. This is done on the basis of our policies and we will inform you about such processing at the time when the data is obtained or as soon as reasonably possible thereafter.

Where the basis of processing your personal data is contractual necessity and you fail to provide the personal data in question, Academic Solutions may not be able to process your application nor provide you with the program for which you have applied. A failure to provide immigration-related data may result in failure to obtain a student visa if you require it.

*Personal data received from parties other than yourself*

**Data Source**

|  |  |
| --- | --- |
| Student immigration status | Host Government Immigration Offices |
| Transcripts - details of programmes undertaken or being undertaken at the home institution; attainment | Your institution |
| Full name, date of birth, email address and passport details. | Your institution |
| Medical, mental health, accessibility-related and similar information | Your institution, medical practitioners and/or family members |

*Recipients of personal data*

The following table lists what information we may share with whom:

**Recipients Data we may share with them**

|  |  |
| --- | --- |
| Academic staff | Contact details, attendance and progression information, where necessary for the implementation of reasonable adjustments and/or the provision of other support and subject to student consent, health information. |
| Our administrative/support staff | Contact details, immigration details, attendance and progression information, where necessary for the implementation of reasonable adjustments and/or the provision of other support and subject to your consent, health information. |
| Placement providers | Your CV as well as any accessibility and assistance requirements and related information |
| Co-curricular and/or extra-curricular excursion providers | Accessibility and assistance requirements and related information |
| Your home institution | Academic results; course registration information; disciplinary matters; medical matters; and student feedback |
| Host universities | Academic records CV and volunteering history  Details of disability and support needs, where applicable  Date of birth, gender, emergency contact information  (These are shared with consent) |
| Housing providers | Your details and passport details |

*Overseas transfers of personal data (i.e. outside the European Economic Area (EEA)*

As shown in the table above, we will share your personal data with your home institution which may be outside of the EEA, on the grounds that such data transfer is necessary for performing our contract with them, which is in your interest.

*Retention of data*

Usually application-related personal data will be kept for approximately one year. Contractual information (e.g. details of your attendance, performance, contact details) may be retained for up to six years after you have completed the program. Retention periods are usually linked to legal limitation (statute of limitation) periods.

*Your rights as a data subject*

As a data subject, you have the following rights in relation to your personal data processed by us:

* To gain access to your personal data;
* To rectify inaccuracies or where appropriate, given the purposes for which your data is  processed, the right to have incomplete data complete;
* To have your personal data erased. This is a limited right which applies when the data is no longer required, consent has been withdrawn and/or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest;
* To object to the processing of your personal data for marketing purposes. You may also object when the processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing;
* To restrict the processing of your personal data. This is a limited right which applies in specific circumstances and for a limited period;
* To obtain a copy of your data in a commonly used electronic form if the data is processed by automated means and the processing is based on your consent or contractual necessity.
* *Withdrawing consent*
* If we are relying on your consent to process your data, you may withdraw your consent at any time.
* *Exercising your rights, queries and complaints*
* For more information on your rights, if you wish to exercise any right or for any queries you may have or if you wish to make a complaint, please contact our Director:
* Ryan Lorenz
* Academic Solutions

99 Great Russell Street

London WC1B 3LA

UNITED KINGDOM

[ryan@academic-solutions.com](mailto:ryan@academic-solutions.com) +44 (0)7947 601871

* *Complaints to the Information Commissioner*

### You have a right to complain to the Information Commissioner's Office (ICO) of the United Kingdom about the way in which we process your personal data. You can make a complaint on the ICO’s website <https://ico.org.uk/>

### *Consent and Understanding of Our Personal Data Policy*

### By signing this form I understand and consent to the use of my personal data as described in this Student Data Personal Use Policy.

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### *Printed Name Date*

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### *Signature*