

## Privacy Policy

We are pleased that you are using our application support service (“Services”). Data protection and data security when using our Services are very important to us. We would therefore like to inform you which of your personal data we collect when you use our Services and for what purposes it is used.

### BACKGROUND

This Privacy Policy describes our privacy practices in plain language, keeping legal and technical jargon to a minimum, to make sure you understand the information provided. However, to achieve this objective we would like to explain to you the following concepts.

#### *a) What is Personal Data?*

Personal Data is any includes information relating to an individual who can be identified or who is identifiable, directly from the information in question; or who can be indirectly identified from that information in combination with other information.

#### *b) What is Special Category Data?*

Special category data is Personal Data that needs more protection because it is sensitive. This includes Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data. As well as, data concerning health, a person’s sex life; and a person’s sexual orientation. In order to lawfully process Special Category Data, it is necessary to consent to the processing.

#### *c) What is Processing?*

"Processing" means and covers virtually any handling of data.

### WHAT LAW APPLIES?

We will only use your Personal Data in accordance with the applicable data protection laws, in particular the UK's Data Protection Act (“DPA”) and the EU's General Data Protection Regulation (“GDPR”).

### WHO IS RESPONSIBLE?

The person responsible is Study Options Limited of 83 Alma Road, Clifton, Bristol, BS8 2DP (“Study Options”, “we”, “us”, or “our”). Please direct any questions you may have to our Data Protection Manager, Stefan Watts, by email using [stefan@studyoptions.com](mailto:stefan@studyoptions.com), or write to us at the above address.

### DATA COLLECTION

All Personal Data that we obtain from you will only be processed for the purposes described in more detail below. In particular, we collect Personal Data only if:

- you have given your consent;
- the data is necessary for the fulfilment of a contract / pre-contractual measures;
- the data is necessary for the fulfilment of a legal obligation; or
- the data is necessary to protect the legitimate interests of our company and business.

### DATA RETENTION

We process and store your Personal Data only for the period of time required to achieve the respective processing purpose or for as long as a legal retention period exists (in particular commercial and tax law in accordance with applicable Commercial Laws and Fiscal Codes and others for up to 6 years). Once the purpose has been achieved or the retention period has expired, the corresponding data is routinely deleted.

## Privacy Policy

### DATA STORAGE

In general, your data is saved and stored using the services of OneDrive cloud storage service provided by [Microsoft](#) and our [Salesforce](#) CRM (see below). We will retain your Personal Data as necessary in connection with the purposes described in this Privacy Policy, and in accordance with the UK's retention periods if applicable.

### DATA WE COLLECT

#### *a) Contacting Us*

We offer you the opportunity to contact us using various methods. We collect the data you submit such as your name, email address, telephone number and your message in order to process your enquiry and respond to you. The legal basis is both your consent and contract.

#### *b) Using our services*

Most of the information we use is collected from you, either directly (for example when you fill in a form). The primary record relating to your application is held by us, and on your digital student file. Further information will also be held by your chosen University. The information we hold consists of the following:

- Identity
  - Full name and title
  - Preferred name
  - Gender
  - Date of birth
  - Nationality
  - Country of birth
  - Country of domicile
  - Passport details
  - Visa details
- Contact details
  - Full postal address
  - Telephone number(s)
  - Email address
  - Next of kin details
- Education information
  - Current school/university, and school year
  - Previous school history
  - Course of interest
  - Intended year of entry
  - Full qualification history
  - Fee status
- Work information
  - Employer details (Dependent on application type)
  - Job title
  - Work experience
- Domestic and family information

## Privacy Policy

- 'Special category' or sensitive information
  - Medications taken and current medical treatments, where applicable
  - Allergies
  - Additional requirements to enable reasonable adjustments
  - Criminal convictions (required for certain courses)
  
- Information relating to your studies
  - A record of your application to the University, including information obtained from other organisations involved with your application.
  - Details of your courses, enrolments, timetables
  - Proceedings of any academic or professional conduct investigation or assessments
  - Where relevant, records of any non-academic disciplinary proceedings or investigations
  - Records of your attendance and engagement with academic systems and services
  - Where applicable, information relating to your placements, student internships, and study abroad.
  - Financial information collected for the purposes of administering fees and charges, loans, grants, studentships and hardship funds
  - Details of any sponsors supporting your studies. This does not include third parties (such as parents) who may be paying for your studies but with whom no formal contract exists
  - Records of and relating to travel (placements or School events, for example), including passport and insurance details (where relevant)
  - Any further biographical information, such as academic qualifications, that you have entered into a University system yourself, such as those used to populate a Pure profile/people page
  
- Other information
  - Responses to voluntary surveys that you have submitted
  - Information provided by you in relation to any University
  - Records of University non-course related events or training that you have attended and/or participated in
  - Records relating to your residence in University accommodation, where applicable
  - Information you have submitted to online learning and personal development and wellbeing platforms, where we legitimately have a right of access to this data

### Why we need to use your information

- To provide our Services to you
- For administration of the Admissions Procedure
- For contacting referees
- To assess our offer to you
- To assess fee status
- For the provision of advice, support and welfare (e.g. counselling)
- To create records to enable use of University services
- For the purposes of administering fees and charges, loans, grants, and studentships
- For the purposes of Disclosure and Barring (DBS) checking,
- To process admissions appeals or complaints

Generally, our legal basis for processing your personal data is that it is necessary for the performance of the contract between you and us. We also have some activities that are in our legitimate interest, or require your consent to carry out, and some that we are legally obliged to undertake.

## Privacy Policy

### *c) Administration*

We process data in the context of administrative tasks as well as organisation of our business, and compliance with legal obligations, such as storing using the OneDrive cloud storage service provided by [Microsoft](#) and archiving. In this regard, we process the same data that we process in the course of providing our contractual services. The processing bases are our legal obligations and our legitimate interest.

### *d) Customer Relationship Management System*

For support, we may store the data related to our customers (for example, your name, address, e-mail address or telephone number) in our customer relationship management system (CRM) using the services of [Salesforce](#). This data processing is based on our legitimate interest in providing our customer service.

## DATA SHARING

In certain cases, it is necessary to transmit the processed Personal Data in the course of data processing. In this respect, there are different recipient bodies and categories of recipients.

### *a) Internal*

If necessary, we transfer your Personal Data within Study Options. Of course, we comply with the DPA and the GDPR and ensure that your data is processed properly. Access to your Personal Data is only granted to authorised employees who need access to the data due to their job, e.g., to provide our services or to contact you in case of queries. For further information in relation to the adequate protection for your Personal Data when it is transferred within Study Options, please refer to our Data Processing Addendum.

### *b) External bodies*

Personal Data is transferred to our service providers in the following instances:

- in the context of fulfilling our contract with you,
- to communicate with you,
- to provide our Services, and
- to state authorities and institutions as far as this is required or necessary.

### *c) International transfers*

We may transfer your Personal Data to other companies and universities as necessary for the purposes described in this Privacy Policy. In order to provide adequate protection for your Personal Data when it is transferred, we have contractual arrangements regarding such transfers. We take all reasonable technical and organisational measures to protect the Personal Data we transfer.

## DATA SECURITY

Our Services uses SSL or TLS encryption to ensure the security of data processing and to protect the transmission of confidential content that you send to us. We have also implemented numerous security measures (“technical and organisational measures”) for example encryption or need to know access, to ensure the most complete protection of Personal Data processed through our Services.

Nevertheless, internet-based data transmissions can always have security gaps, so that absolute protection cannot be guaranteed. And databases or data sets that include Personal Data may be breached inadvertently or through wrongful intrusion. Upon becoming aware of a data breach, we will notify all affected individuals whose Personal Data may have been compromised as expeditiously as possible after which the breach was discovered.

## Privacy Policy

### YOUR RIGHTS AND PRIVILEGES

#### a) *Privacy rights*

Under the DPA and GDPR, you can exercise the following rights:

- *The right to access;*
- *The right to rectification;*
- *The right to erasure;*
- *The right to restrict processing;*
- *The right to object to processing;*
- *The right to data portability;*

#### b) *Updating your information and withdrawing your consent*

If you believe that the information we hold about you is inaccurate or request its rectification, deletion, or object to legitimate interest processing, please do so by contacting us.

#### c) *Access Request*

In the event you want to make a Data Subject Access Request, please contact us. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days, we will tell you why and when we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we will tell you why.

#### d) *Complaint to a supervisory authority*

You have the right to complain about our processing of Personal Data to a supervisory authority responsible for data protection. The supervisory authority in the UK is: The Information Commissioner's Office, ([www.ico.org.uk](http://www.ico.org.uk)). However, we would appreciate the opportunity to address your concerns before you contact any supervisory authority.

#### e) *What we do not do*

- We do not request Personal Data from minors and children;
- We do not process special category data without obtaining prior specific consent;
- We do not use Automated decision-making including profiling; and
- We do not sell your Personal Data.

### CHANGES

We may update this Privacy Policy from time to time. If we make changes to this Privacy Policy, we will revise the effective date.

### EFFECTIVE DATE

Sunday, 12th of May, 2024

### QUESTIONS

If you feel that the above is not sufficient or if you have any queries as regards the collection, processing or use of your information we are looking forward to hearing from you. We will make every effort to reply as soon as possible and take into consideration any suggestions from your end.