

**Data Controller (“the Company”):**

STAR Exeter, 89A Queen Street, Exeter EX4 3RP  
Tel. +44 (0)1392 666419  
<https://www.starexeter.com>

**Data Protection Officer:** Caz Potten – [caz@starexeter.com](mailto:caz@starexeter.com)

***Introduction***

The Company collects and processes personal information, or personal data, relating to its students to manage the academic relationship. This personal information may be held by the Company on paper or in electronic format.

The Company is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations under the General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018. The purpose of this privacy notice is to make you aware of how and why we will collect and use your personal information both during and after your studies with STAR Exeter. We are required under the GDPR to notify you of the information contained in this privacy notice.

This privacy notice applies to all current and former students. It is non-contractual and does not form part of any contract.

The Company has appointed Caz Potten to oversee compliance with data protection matters. If you have any questions about this privacy notice or about how we handle your personal information, please contact Caz Potten, who’s contact details are above.

***Data protection principles***

Under the GDPR, there are six data protection principles that the Company must comply with. These provide that the personal information we hold about you must be:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

The Company is responsible for, and must be able to demonstrate compliance with, these principles. This is called accountability.

### What types of personal information do we collect about you?

**Personal information** is any information about an individual from which that person can be directly or indirectly identified. It doesn't include anonymised data, i.e. where all identifying particulars have been removed.

There are also "special categories" of more '**sensitive personal information.**' The Company may also collect and process information about an individual's racial or ethnic origin.

STAR Exeter is an educational organisation where we undertake to teach students, some of whom are under 18 years of age.

The Company collects, uses and processes a range of personal information about you during your studies in accordance with different lawful bases for processing as shown below in the section ***Why and how do we use your personal information?***

The personal information we collect and process is shown below:

- your contact details, including your name, address, telephone number and personal email address
- copies of your passport and travel documentation including visas and flight information.
- your emergency contact details/next of kin
- your date of birth
- your gender
- the start and end dates of your course
- student records, including personal information included in application forms, enrolment forms and applications for homestay accommodation
- details of your skills and qualifications for some of our courses, including our International Foundation Programme (IFP)
- administration and academic records in relation to your studies, which may include, but not limited to, letters for bank accounts and G.P. registration, attendance monitoring and warning letters for poor attendance, academic performance, test and assignment scores, 'intention to study' interviews and medical information.

The Company may, during the course of your studies, also collect, use and process the following **special categories** of your personal information:

- information about your health, including any medical condition, whether you have a disability in respect of which the Company needs to make reasonable adjustments, sickness absence records (including details of the reasons for sickness absence being taken), medical reports and related correspondence

### **How do we collect your personal information?**

The Company will collect personal information about students in a variety of ways. It is collected during the application and enrolment process, either directly from individuals or sometimes from a third party such as an agent.

We will also collect additional personal information throughout the period of your studies. This may be collected in the course of your academic-related activities. Whilst some of the personal information you provide to us is required for your studies, some of it you may be asked to provide to us on a voluntary basis. We will inform you whether you are required to provide certain personal information to us or if you have a choice in this.

Your personal information may be stored in different places, including in your student file in locked filing cabinets in a locked room and on secure, password protected student databases. Certain information you send to us by email may be retained until such a time the information is no longer required. Please see ***For how long does the Company keep your personal information*** for more details on how long we hold your personal data.

### **Why and how do we use your personal information?**

We will only collect and process your personal information when the law allows us to. These are known as the legal bases for processing. We may also do so with your express consent. We will use your personal information in one or more of the following circumstances:

- (1) where we need to comply with a legal obligation
- (2) where we need to protect your interests or those of other students
- (3) where it is necessary to protect our legitimate interests (or those of a third party), except where this is overridden by your interests or your fundamental rights and freedoms.

Our legitimate interests include: performing or exercising our obligations or rights under the direct relationship that exists between the Company and you as the student, performing effective internal administration and ensuring the smooth running of the business; ensuring the security and effective operation of our systems and network; protecting our confidential information; and conducting due diligence on students.

We believe that you have a reasonable expectation as our student that we will process your personal information.

The specific purposes for which we are processing, or will process, your personal information are to:

- enable us to maintain accurate and up-to-date student records and contact details (including details of whom to contact in the event of an emergency)
- comply with statutory and/or regulatory requirements and obligations, e.g. checking your right to study in the UK
- comply with our duty to make reasonable adjustments for disabled students with other disability discrimination obligations
- record and assess your education, training and development activities and needs
- plan for career development and succession including providing support to progress to university
- manage, plan and organise work
- enable effective workforce planning and management
- operate and maintain a record of sickness absence procedures
- ascertain your fitness to study
- meet our obligations under health and safety laws
- prevent fraud
- monitor your use of our IT systems to ensure compliance with our IT-related policies
- ensure network and information security and prevent unauthorised access and modifications to systems
- ensure adherence to Company rules, policies and procedures
- monitor adherence to equality and diversity

Please note that we may process your personal information without your consent, in compliance with these rules, where this is required or permitted by law.

### **What if you fail to provide personal information?**

If you fail to provide certain personal information when requested or required, this may prevent us from being able to process, for example, your application to study with us.

### **Why and how do we use your sensitive personal information?**

Some special categories of personal information, i.e. information about your health or medical conditions is also processed so that we can perform or exercise our obligations or rights in line with our Data Protection policy.

Where the Company processes other special categories of personal information, i.e. information about your racial or ethnic origin, this is done only for the purpose of equal opportunities monitoring and in line with our Data Protection Policy. Personal information that the Company uses for these purposes is either anonymised or is collected with your explicit written consent, which can be withdrawn at any time by making a request to the Data Protection Officer. It is entirely your choice whether to provide such personal information.

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it. If we need to use your personal information for a purpose other than that for which it was collected, we will provide you, prior to that further processing, with information about the new purpose, we will explain the legal basis which allows us to process your personal information for the new purpose and we will provide you with any relevant further information. We may also issue a new Privacy Notice to you and may request your consent if we need it.

### **Who has access to your personal information?**

Your personal information may be shared internally within the Company, including the academic and administration departments and your teacher.

The Company may if necessary, also share your personal information with third-party service providers (and their designated agents), including:

- external auditors and inspectors, such as British Council and ISI
- universities when we provide support in your progression
- your agent, if applicable

We will always gain consent before sharing your personal data with anyone other than STAR Exeter.

### **How does the Company protect your personal information?**

The Company has put in place measures to protect the security of your personal information. It has internal policies, procedures, passwords and controls in place to try and prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, workers, agents and contractors who have a business need to know in order to perform their job duties and responsibilities. You can obtain further information about these measures from our Data Protection Officer.

Where your personal information is shared with third-party service providers, we require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

The Company also has in place procedures to deal with a suspected data security breach and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.

### **For how long does the Company keep your personal information?**

The Company will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed.

The Company will generally hold your personal information for the duration of your studies

If you apply for a course with STAR Exeter but do not enrol, we will securely destroy all personal information we hold about you after 2 months, both on paper and in digital format.

If you enrol and study at STAR Exeter, your personal information will be held for no longer than five years from the date your enrolment ends. We are required to keep your personal data should we receive an inspection, or until such a time that you ask for the information to be destroyed/removed.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable.

In some circumstances we may anonymise your personal information so that it no longer permits your identification. In this case, we may retain such information for a longer period.

### **Your rights in connection with your personal information**

It is important that the personal information we hold about you is accurate and up to date. Please keep us informed if your personal information changes, e.g. you change your home address, phone number or email address so that our records can be updated. The Company cannot be held responsible for any errors in your personal information in this regard unless you have notified the Company of the relevant change.

As a data subject, you have a number of statutory rights. Subject to certain conditions, and in certain circumstances, you have the right to:

- request access to your personal information - this is usually known as making a data subject access request and it enables you to receive a copy of the personal information we hold about you and to check that it is accurate and that we are lawfully processing it
- request rectification of your personal information - this enables you to have any inaccurate or incomplete personal information we hold about you corrected
- request the erasure of your personal information - this enables you to ask us to delete or remove your personal information where there's no compelling reason for its continued processing, e.g. it's no longer necessary in relation to the purpose for which it was originally collected

- restrict the processing of your personal information - this enables you to ask us to suspend the processing of your personal information, e.g. if you contest its accuracy and so want us to verify its accuracy
- object to the processing of your personal information - this enables you to ask us to stop processing your personal information where we are relying on the legitimate interests of the business as our legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground
- data portability - this gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact our Data Protection Officer. We may need to request specific information from you in order to verify your identity and check your right to access the personal information or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact our Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your personal information for the purpose you originally agreed to, unless we have another legal basis for processing.

If you believe that the Company has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues.

### **Transferring personal information outside the European Economic Area (EEA)**

We may, on occasions, transfer your information outside of the EEA for the purpose of processing your application. For example, to send an offer to study to your agent.

### **Automated decision making**

Automated decision making occurs when an electronic system uses your personal information to make a decision without human intervention.

We do not envisage that any decisions will be taken about you based solely on automated decision making, including profiling. However, we will notify you in writing if this position changes.

### **Changes to this privacy notice**

The Company reserves the right to update or amend this Privacy Notice at any time, including where the Company intends to further process your personal information for a purpose other than that for which the personal information was collected or where we intend to process new types of personal information. We will notify you when we make significant updates or amendments. We may also notify you about the processing of your personal information in other ways.

### **Contact**

If you have any questions about this Privacy Notice or how we handle your personal information, please contact our Data Protection Officer.