

Website Privacy Policy

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Linked policies and documents:	Data Protection Policy Policy on Your Rights in Relation to Your Data Student Privacy Policy
External references	Data Protection Act 2018
	General Data Protection Law
	UK Quality Code UKSCQA/02 Advice and Guidance on Monitoring and Evaluation (6.7) <i>Providers take account of ethics and data protection requirements when designing and operating monitoring and evaluation systems.</i>
	ICO No. Z1097339
Audience:	OBC Staff and Students

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1 Introduction

Welcome to our website Privacy Policy. At our Oxford Business College, we take the privacy and security of our website users very seriously. This policy explains how we collect, use, and protect your personal information when you use our website, and outlines your rights and choices with respect to your personal data. We are committed to being transparent and clear about how we handle your information, and to complying with all relevant data protection legislation and regulations.

Oxford Business College (referred to as “the College”, “we”, “us”, “our”) take the protection of your personal data very seriously and strictly adhere to the rules laid out by data protection laws and General Data Personal Regulation (GDPR).

2 Purpose

The purpose of this Privacy Policy is to inform you about how we collect, use, and process your personal data when you use our website. It also sets out your rights with respect to your personal information and provides information on how to exercise those rights. This policy is intended to be clear, concise, and easy to understand, and we encourage you to read it carefully.

3 Scope

This Privacy Policy applies to all personal information collected through our website, including information provided by users when they register, fill out a form, or interact with our website in any other way. It also covers information collected automatically through the use of cookies and similar technologies, as well as information collected from third-party sources.

4 Aims and Objectives

This privacy notice aims to give you information on how the College collects and processes your personal data through your interaction with our websites including the domain <https://oxfordbusinesscollege.ac.uk/>, or by entering into a relationship with us, for the delivery of our services and to comply with our legal requirements.

4.1 The objectives of this Privacy Policy are to:

- Clearly explain how we collect, use, and process your personal information
- Provide transparency about the purposes for which we collect your data
- Outline your rights with respect to your personal information, and how to exercise those rights
- Ensure that your personal data is collected and processed in a lawful, fair, and transparent manner
- Ensure that your personal data is kept secure and protected against unauthorised access, loss, or disclosure
- Demonstrate our commitment to protecting your privacy and complying with all relevant data protection legislation and regulations.

5 Who You Are

The types of personal data we process, our purpose and the lawful basis for processing as well as how we make use of the data depends upon the relationship you have with us.

In the sections that follow we have outlined the type of personal data we collect and how we collect it, the purposes for which we process personal data and our lawful bases for our different relationships.

5.1 Please select the relevant section for you from the list below, based on the relationship you have with us:

- Website Visitors
- Marketing Recipients (Prospective Students)
- Students
- Suppliers or Staff/Representative of Suppliers
- Employee Candidates (Recruitment)

6 Website Visitors

6.1 For the purpose of researching and analysing the use of our websites and services

6.2 For the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally

6.3 For notifying you about the changes to our service and communicating service messages

6.4 Lawful Basis for Processing personal Information

6.5 We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- The data subject (you) has given consent to the processing activity taking place.
- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners.

Any personal information collected will be processed and safeguarded in accordance with the Data Protection Act 2018 which incorporated the General Data Protection Regulation (EU 2016/679) (GDPR).

6.6 Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:

- **The purpose test** – to identify the legitimate interest
- **Necessity test** – to consider if the processing is necessary for the purpose identified
- **Balancing test** – considering the individual's interests, rights or freedoms and whether these override the legitimate interests identified.

6.7 What information do we collect and where from?

We collect personal information from you, when you interact with our websites under the domain <https://obc.ac.uk/>, through utilisation of cookies and tracking technologies or when you enquire about any of our services. The categories of personal information that we may collect, store and use about you include:

- Information about your activity on our site including Information that you provide by filling in forms on our website, this includes information provided at the time of registering to use our site.
- Your details for communication as stated on the “Contact Us” form.
- Records of your correspondence with us
- System Information, such as IP Address, Browser type & version, operating system

7 Marketing Recipients (Prospective Students)

7.1 Why we collect your personal information

- Where you have consented such purposes, for marketing-related purposes including operating cookies, tracking resources or services , and sending out emails, text messages and to make calls to you to complete your application
- Where you have consented to be contacted for such purposes, for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and/or fax and making contact by telephone for marketing-related purposes and lead generation
- For notifying you about the changes to our service and communicating service messages

7.2 Lawful basis of processing Personal information

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- The data subject (you) has given consent to the processing activity taking place.
- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners.
- Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:
 - The purpose test – to identify the legitimate interest
 - Necessity test – to consider if the processing is necessary for the purpose identified
 - Balancing test – considering the individual’s interests, rights or freedoms and whether these override the legitimate interests identified.

7.3 What information do we collect and from where

We collect personal information from you, when you interact with our websites under the domain <https://oxfordbusinesscollege.ac.uk/>, through utilisation of cookies and tracking technologies, when you enquire about any of our services or when you start your applications. The categories of personal information that we may collect, store and

use about you include:

- Identification information such as name and surname
- Contact information such as email, telephone number
- Information about your activity on our site including Information that you provide by filling in forms on our website, this includes information provided at the time of registering to use our site.
- Records of your correspondence with us

For more information please see [here](#).

8 Students

As student of the College, you have already been provided with the Student Privacy Policy and the Consent form upon your application through the Oxford Study. The Student Privacy Policy gives you information on how we collect and process your personal data as long as you are a student of Oxford Business College.

9 Suppliers and Staff/Representative of Suppliers

9.1 Why we collect your personal information

- To complete our supplier onboarding process and conduct due diligence checks
- For the issuing and tracking and invoices and where we need to perform the contract we have entered with you such as by making payments.
- For the purpose of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing)
- For managing referrals and making payments for referral commissions

9.2 Lawful basis of processing personal information

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- If the processing is necessary for compliance with a legal obligation to which the controller is subject.
- If the processing is necessary for the performance of a contract.
- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners.

9.3 Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:

- The purpose test – to identify the legitimate interest
- Necessity test – to consider if the processing is necessary for the purpose identified
- Balancing test – considering the individual's interests, rights or freedoms and whether these override the legitimate interests identified.

9.4 What information do we collect and where from

We collect your personal data through publicly available sources or referrals initially and through our relationship with you. We may collect and process the following information about you:

- Identification information such as name and surname
- Contact information such as email, telephone number
- Job Title, company address, company name
- Bank details, VAT number

For more information please see [here](#).

10 Employee Candidates (Recruitment)

10.1 Why we collect your personal information

For the purpose of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, fax and/or telephone, providing support services and complaint handling.

For the purpose of carrying out our recruitment process and determine eligibility for the advertised role.

10.2 Lawful basis of processing personal information

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- If the processing is necessary for compliance with a legal obligation to which the controller is subject.
- If the processing is necessary for the performance of a contract.

10.3 What information do we collect and where from

We collect your personal data through your application and through using recruitment agencies. We may collect and process the following information about you:

- Identification information such as name and surname including any other listed on the CVs such as nationality
- Information available on CV or cover letters
- Contact information such as email addresses, postal address & telephone numbers
- Education history such as establishments attended and qualifications.
- Employment history

For more information please see [here](#).

11 How Long Do We Keep Information

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. We will review your personal information regularly to establish whether we are still entitled to process it. If we decided that we are not entitled to do so, we will stop processing your personal information to the extent that it is appropriate to do so and securely delete or anonymise it. To determine the appropriate retention period, we will consider the amount, nature and sensitivity of that information, the potential risk of harm from unauthorised use or disclosure, and whether we can achieve the purposes for which we process that personal information through other means.

12 Security of Personal Information

The College takes the responsibility for protecting your privacy very seriously and we will ensure your data is secured in accordance with our obligations under the Data Protection laws. We have in place technical and organisational measures to ensure personal information is secured and to prevent your personal data from being accessed in an unauthorised way, altered or disclosed. We use computer safeguards such as firewalls and data encryption, we enforce access controls to our files, and authorise access to personal information only for those employees who require it to fulfil their job responsibilities.

We have policies and procedures to handle any potential data security breaches and data subjects, third parties and any applicable regulators will be notified where we are legally required to do so.

We have ensured that all employees have had information security and data protection training.

If you would like more details of the security we have in place, please see "additional information", section 9 of this policy.

13 Your Rights

13.1 Your principal rights under data protection law are:

- the right to access - you can ask for copies of your personal data; you or any third party acting on your behalf with your authority may request a copy of the personal data we hold about you without charge. The College will ask to verify your identity or request evidence from the third party that they are acting on your behalf before releasing any personal data we hold about you.
- the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data.
- the right to erasure - you can ask us to erase your personal data.
- the right to restrict processing - you can ask us to restrict the processing of your personal data.
- the right to object to processing - you can object to the processing of your personal data if, processing relies on legitimate interests, processing is for scientific or historical research, processing includes automated decision making and profiling, processing is for direct marketing purposes.
- the right to data portability - you can ask that we transfer your personal data to another organisation or to you.
- the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.
- rights relating to complaints and remedies.

These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

You ask any questions about these rights or exercise any of your rights in relation to your personal data by using the contact details set under section 9.

14 Data Transfers

14.1 Transfers to Third Parties

The College may disclose your personal data, listed under the relevant section to some third parties in so far as reasonably necessary for the purposes, and on the legal bases, set out in

this policy. Third parties that we use are listed below:

- Business partners, suppliers, contractors for the performance of any contract we enter into with them or you
- Third parties that support us to provide products and services e.g. IT support, cloud-based software services, providers of telecommunications equipment) (e.g. Xero, Bright HR, Sage, Microsoft 365)
- Communications providers such as TextLocal
- Banks for the purposes of making payments
- Professional advisors e.g. lawyers, auditors, data protection consultants
- Web analytics and search engine provider to ensure the continued improvement and optimisation of our website.
- Website and social media for promotional purposes
- If requested, police or other public bodies with the appropriate authority

If you want to find out in detail who your personal data is shared with, please see "additional information", section 9 of this policy.

14.2 International Data Transfers

We don't share personal information to third parties outside of the United Kingdom. However, the hosting facilities for our website and/or data centres may be located outside the United Kingdom. Any personal information transferred will only be processed on our instruction and we ensure that information security at the highest standard would be used to protect any personal information as required by the Data Protection laws.

If personal data is transferred outside of the UK to a country without an adequacy decision, we will ensure appropriate safeguards are in place prior to the transfer. These could include:

Standard Contractual Clauses with the published ICO Addendum

- International Data Transfer Agreement
- An exception as defined in Article 49 of the GDPR

15 Cookies

Our website uses cookies. Please see our Cookie Policy for full details of the cookies used.

16 Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you have the right to make a complaint to the Information Commissioner's Office

at any time.

By Post:

Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

By Website: [Click Here](#)

By Email: [Click Here](#)

By Phone: [0303 123 1113](#) (Local rate) or [01625 545 745](#) (National rate)

17 Additional Information

Your trust is important to us. That is why we are always available to talk with you at any time and answer any questions concerning how your data is processed. If you have any questions that could not be answered by this privacy policy or if you wish to receive more in -depth information about any topic within it, please contact us at Info@obc.ac.uk

18 Policy Review

We keep this Privacy Policy under regular review. This Website Privacy Policy was last updated April 2023.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.