

Data Privacy Notice & Consent Policy

Policy no:	6.4
Version no.	V24.11
Next review due:	September 2025
Last review date:	November 2024
Responsible Board:	Corporate and Planning Board
Approved by & date:	SMT October 2020
Linked policies and documents:	Policy On Your Rights in Relation to Your Data
External references	Data Protection Act 1998, 2018 Article 51 GDPR
	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
	optindigo.com for GDPR Consultancy and Support
Audience:	Website, face to face, email, College notice boards

Table of Contents

1	Introduction.....	3
2	What information do we collect about you?	3
3	Why we process your personal data.....	4
4	Our lawful bases.....	5
5	Your Rights.....	7
6	Data Transfers.....	8
7	International Data Transfers.....	9
8	Complaints	9
9	Additional Information.....	10
10	Policy Review	10

1 Introduction

This privacy notice informs you of what to expect when Oxford Business College collects your personal information through your interaction with our websites under the domain <https://oxfordbusinesscollege.ac.uk/>, or by applying to or becoming a student and what your rights are in respect of that information.

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).

At Oxford Business College we do all we can to respect your right to privacy and the protection of your personal information. The College has appointed a Data Protection Officer and is registered with the Information Commissioner's Office. Its registration number is Z1097339. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the contact information laid out in section 10 of this privacy notice.

Oxford Business College may change this policy from time to time by updating this page. You should check this page to ensure that you are happy with any changes.

2 What information do we collect about you?

We collect information about students when they enquire, apply and enrol on our courses and throughout our relationship with them.

2.1 Personal data relating to students and potential students that we collect includes:

- Name
- Contact information such as email, phone number, address
- OBC ID number and university ID number
- University preference and acceptance status
- Academic achievements and performance, qualifications
- Exam results and answers
- List of modules and courses enrolled to
- Job title, company
- Date of birth

- Passport data, immigration and settlement status
- Nationality
- Gender
- Past educational institutions
- Emergency contact
- Bank details etc.
- Financial status, socio economic background
- Reasons for applying to scholarships, bursaries and hardships
- Photos for student events
- Video images and possibly audio recordings through CCTV
- Nature of complaints and details about appeal process and mitigating circumstances
- Signature
- Details about any query you may make throughout being a student
- Personal data you may share during counselling sessions
- Employment reference, name of referee

As part of your applications or throughout your counselling sessions we may also collect some special category data namely, personal demographics (including race, ethnicity, sexual orientation, religion), criminal offenses. We will only process special category data where we have an Article 9 exception allowing us to do so, in this case, where we have the explicit consent of the data subject as per Article 9 paragraph 2a of the GDPR and as per the substantial public interest condition in Article 9 paragraph 2g of the GDPR and the Data Protection Act 2018 schedule 1 condition 8 and 9.

3 Why we process your personal data

3.1 Your personal information is also used for the College's below purposes:

- Monitoring turnover and student payments, maintaining our accounts
- Managing scholarships bursaries and hardship funding
- For administration and facilitation of education such as by setting up student emails and Moodle accounts, handling communications (excluding communicating for the purposes of direct marketing), providing student services and support, dealing with student complaints, providing counselling sessions
- For notifying you about the changes to our service and communicating service messages
- 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 CCTV monitoring
- To comply with our legal obligations such as in the case of mandatory disclosures to third parties , processing data as part of internal audits
- For promoting and administering our services such as through hosting student events
- Information collected about students during their learning including any enquiries and applications will be used for educational administration, guidance, statistical research and health and safety purposes.

4 Our lawful bases

4.1 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 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.

4.2 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.

We also process personal information to enable us to fulfil our public tasks including our responsibilities as the lead regulator for higher education in England. This function is directed by the secretary of state and is in accordance with our legal obligations including those described in the Higher Education and Research Act 2017. We also have a role in monitoring the performance by higher education providers of their 'prevent' duty under the Counter-terrorism and Security Act 2015.

4.3 How long 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.

If you would like to find out how long your information is being retained, please see "additional information", section 10 of this policy.

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 10 of this policy.

5 Your Rights

5.1 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 10.

6 Data Transfers

6.1 Transfers to Third Parties

The College may disclose your personal data, listed under the relevant section to some third parties insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy. Third parties that we use are listed below:

- Our university partners
- 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, Sage, Microsoft 365)
- Communications providers such as Text Localz
- 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, other public bodies or other third parties with the appropriate authority

If you want to find out in detail who your personal data is shared with, please see "additional information", section 10 of this policy.

7 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.

7.1 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
- For more information about transfers and safeguarding measures, please contact us using the information in section 10.

8 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)

9 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 DPO@obc.ac.uk

10 Policy Review

We keep this Privacy Policy under regular review. 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.