

College of Central London

Privacy Policy

Introduction

Welcome to the College of Central London Limited (College of Central London - CCL) privacy notice. We take the protection of your personal data very seriously and are committed to protecting and respecting your privacy.

The EU General Data Protection regulation (GDPR) and the Data Protection Act 2018, gives people the right to know what information is held about them, and requires the College of Central London to ensure that personal information relating to living individuals is handled properly, held in confidence and is protected from inappropriate disclosure to third parties.

Our Data Protection Officer

If you have any questions about the College of Central London's privacy policy, please contact the Data Protection Officer at the College of Central London, Tower Bridge Business Centre, 46-48 East Smithfield, London E1W 1AW ccl@central-college.uk

How to Use This Privacy Policy

The College of Central London holds and processes information about many different types of people such as its current, past or prospective employees, visitors to its website, applicants, students and alumni & supporters. It also processes personal information for a variety of reasons. We may also be required by law to collect and use certain types of personal information to comply with statutory requirements. For each category of personal data process you will find the following headings:

- What types of personal data we collect?
- How we use your information?
- What we use your information for?
- Where we collect your information from?
- Who we share your information with?
- How long do we keep your personal information?

- How can you access, amend or take back the personal data that you have given to us?
- How do we store and transfer your data internationally?
- What are cookies and how do we use them?
- How to reject cookies

More information on how the College of Central London collects and uses personal information can be found in the relevant privacy notices below:

Website visitor – Privacy Notice

Types of personal information - we do NOT have cookies enabled

We do NOT collect, use and store different types of personal information

Cookies

Our website <https://www.cental-college.uk> and our older website <https://www.central-college.com> do NOT use cookies. For more information on cookies use, [CCookie-Script: GDPR | CCPA | ePR cookie compliance solution](#)

Applicants and Students Privacy Notice

The College of Central London takes is committed to protecting and respecting your privacy.

When processing your Personal Data, the College of Central London is obliged to fulfil individuals' reasonable expectations of privacy by complying with the General Data Protection Regulation (the GDPR), the Data Protection Act 2018 (DPA), and other relevant legislation and regulations (collectively "Data Protection Law").

Purpose of this Notice

This privacy policy sets out the basis on which any personal data we collect from you, or that you or any third parties provide, will be processed by us. We may withdraw or modify this notice at any time and we may supplement or amend this notice by additional policies and guidelines from time to time. We will notify you if this notice is amended.

Your personal information

We hold a range of personal data about you, which you provide to us. See below for further details of personal data we receive from third parties. Examples of categories of personal data which we hold are: your 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 provide to us. In addition, if you come to study with us, we process data about your academic performance, attendance and progression, and where relevant, breaches of our policies (e.g. academic or other misconduct concerning the College of Central London -related activities). We also process contact and educational details after you have completed your programme or your activities with us are otherwise terminated.

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

When you are an applicant, we process your personal data for the purposes of assessing your eligibility to be offered a place on one of our programmes.

If you take up a place at the College of Central London, we process your personal data for the purposes of providing our academic or professional programmes and related services.

If you are unsuccessful or do not take up a place at the College of Central London we will retain your personal data in line with our retention schedules for statistical and audit purposes or in the event of a complaint or an appeal.

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 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 personal data you provide 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 programme and related support services. Some personal data is also required to fulfil our legal obligations regarding immigration.

| No | Purpose | Legal basis/ justification |
|----|---|--|
| 1 | Assessing eligibility to undertake our academic or professional programmes. | Processing is necessary for the purposes of taking steps prior to entering into a contract with us |

| No | Purpose | Legal basis/ justification |
|----|--|---|
| 2 | Supporting applicants through the application process and providing further information on the services we can offer | Necessary for negotiating to enter into a contract and legitimate interests in providing support to applicants |
| 3 | Provision of academic programmes and related services (including IT and library services). | Necessary for performing a contract, i.e. to provide your chosen academic programme. This can be a contract with us or a contract between you and your home institution ("contractual necessity") |
| 4 | Identifying students and assisting them in trying to succeed in their learning via the dashboard system. | Contractual necessity and legitimate interest in assisting our students to succeed in their studies |
| 5 | Assessment of academic progress and performance (including attendance), and where necessary providing support | Contractual necessity |
| 6 | Financial Administration (including provision of loans and bursaries) | Contractual necessity |
| 7 | Administration of extenuating circumstances procedures. | Contractual necessity |
| 8 | Administration of complaints, academic | Contractual necessity |

| No | Purpose | Legal basis/ justification |
|----|---|--|
| | appeals, interruption and withdrawal, fitness to study and fitness to practice procedures. | |
| 9 | Immigration matters. | Necessary for us to comply with our legal obligations in relation to students who hold visas. |
| 10 | <p>Making reasonable adjustments for disabilities and providing relevant support to students with ill health and providing wellbeing support.</p> <p>This includes processing special category information.</p> | Explicit consent. |
| 11 | Employability Support | Contractual necessity and our legitimate interest in assisting our students and alumni to progress in their careers. |
| 12 | Regulating the student community at the College of Central London (including dealing with misconduct under our procedures for academic and other misconduct including disciplinary procedures) | Contractual necessity and our legitimate interest in maintaining academic standards and the good order. |

| No | Purpose | Legal basis/ justification |
|----|---|---|
| 13 | Obtaining payment of fees. | Contractual necessity and our legitimate interest in obtaining payment for the services we provide. |
| 14 | Protecting our property and assets (e.g. by dealing with misconduct) | Necessary for our legitimate interest in safeguarding our property and assets. |
| 15 | 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 or professional programmes and related student services. |
| 16 | Communicating with students | Contractual necessity and our legitimate interest in marketing the College of Central London and promoting student welfare. |
| 17 | Registering alumni to maintain an alumni network | Necessary for our legitimate interests in maintaining an alumni network, and marketing |
| 18 | To facilitate data-gathering to improve our educational services, our website, and our marketing efforts. | The College of Central London's legitimate business interests such as managing and developing its business. |

Personal data received from third parties

| No | Data | Source |
|----|---------------------------------|--------------|
| 1 | Contact details and attainment. | UCAS, UKPASS |

| No | Data | Source |
|----|--|---|
| 2 | Your immigration status. | Home Office (UKVI) |
| 3 | Transcripts - details of programmes undertaken or being undertaken at another institution; attainment. | Another institution and/or secondary/high schools. |
| 4 | Medical, mental health, accessibility-related and similar information. This is special category personal data. We only obtain this information from third parties if you give us consent to do so or if it's a matter of life and death. | Another institution, medical practitioners and/or family members |
| 5 | Details of any College of Central London -associated complaint | Office of the Independent Adjudicator, and/or Competition and Markets Authority |
| 6 | Information required to assess eligibility for courses i.e. from employers or sponsors. | Employers or sponsors. |

Recipients of personal data

On occasion we may need to share your data with third parties. The following table lists what information we may share with whom

| No | Recipients | Data which we may share with them |
|----|----------------------------|--|
| 1 | Companies within the group | Contact details, Course information where students and graduates are interested in entrepreneurship activities and relevant employability activities |
| 2 | Placement providers | Your CV as well as any accessibility and assistance requirements and related information. |

| No | Recipients | Data which we may share with them |
|----|---|--|
| 3 | Your employer if you are an apprentice. | Details as to how you are performing in the academic part of your apprenticeship. |
| 4 | External examiners. | Identification details and exam papers. |
| 5 | Viper plagiarism software | Identification details and assessment papers in order to detect plagiarism |
| 6 | UK Home Office | Passport details; contact details; programme details including attendance, placement details and work experience; fees and housing details |
| 7 | Local Authority (including the electorate office). | Contact details and course details where there's a legal basis. |
| 8 | College of Central London's insurers and internal and external auditors, Health and Safety Executive in respect of accidents or incidents connected with the company. | Student details and details in relation to any incident. |
| 9 | Regulatory bodies, where you are on a professional programme | Contact details, attendance and progression information and potentially disciplinary or fitness to study or fitness to practice issues |
| 10 | Government agencies i.e. HMRC* | Contact details and potentially other information if requested where there is a legal basis. |

| No | Recipients | Data which we may share with them |
|----|--|---|
| 11 | Police*. | Contact details and potentially other information if requested where there is a legal basis. |
| 12 | London Borough of Tower Hamlets or other members of the Channel Panel, a programme which provides support to individuals who are at risk of being drawn into terrorism as defined in Part 5, Chapter 2 of the Counter Terrorism and Security Act 2015. | Contact details and other information that the College of Central London could be required to supply in order to comply with the Counter Terrorism and Security Act 2015. |
| 13 | Potential employers or other companies requesting a reference or confirmation of qualifications | Attendance, progression and performance details including disciplinary or academic misconduct issues or breaches of the College of Central London's regulations. |
| 14 | Close family, next of kin and emergency services where there is an emergency situation such as illness or serious injury | Personal data including potentially special category data if necessary |
| 15 | Higher Education Statistics Agency ("HESA"); Office for Students and Government Departments such as | Personal details, progression and performance details, details of the Destination of Leavers' Survey. |

| No | Recipients | Data which we may share with them |
|----|--|---|
| | the Department for Education for analysis of student data or to carry out statutory functions | <p>The privacy notice for the Office for Students including sensitive data that they may hold, can be found here</p> <p>https://www.officeforstudents.org.uk/privacy/.</p> <p>The privacy notice for HESA can be found here https://www.hesa.ac.uk/about/website/privacy</p> |
| 16 | External debt collection agencies, in relation to student debts where the College of Central London's own recovery attempts have proven unsuccessful | Contact details and details of debt. |

* This will only be shared on request and where there is a legal basis for doing so.

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

Where possible, we aim to hold personal data relating to students within the EEA. Where any of your personal data is transferred outside the EEA it will be subject to a legally binding data sharing agreement and to an adequacy decision by the European Commission (country, territory or specified sectors), or other appropriate safeguards as set out in Article 46 of the GDPR.

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 completed;

- To have your personal data erased. This is a limited right which applies, among other circumstances, 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 will apply 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.
- To not have decisions with legal or similar effects made solely using automated processing, unless certain exceptions apply.

Where we are relying on your consent to process your data, you may withdraw your consent at any time. Your requests will be considered at the latest within one month.

Exercising your rights, queries and complaints

For more information on your rights, if you wish to exercise any of the above rights or for any queries you may have or if you wish to make a complaint, please contact our Data Protection Officer at the College of Central London 46-48 East Smithfield London E1W 1AW

Complaints to the Information Commissioner

The college of Central London maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with the Data Protection Legislation. The college of Central London registration number is **Z7344788** and sets out, in very general terms, the full range of purposes for which we use, students and all other personal information

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

What legal bases do we rely on for processing your personal data?

Depending on the activity being carried out, we will rely on one of the following

conditions for processing: a legitimate interest; a legal obligation; or your consent to process your data, as explained below.

- **GDPR Article 6(1) (a) – Consent of the data subject**
Unless mentioned below, we will only process your personal data in relation to alumni and development purposes where we have your consent. This means we will only email you, or call TPS registered numbers, if we have your express consent to do so. We may contact you by post, unless you have asked us not to. We will also only contact you about College news, events or to ask for a donation if we have your express consent to do so.
- **GDPR Article 6(1)(c) – Processing is necessary for compliance with a legal obligation.** We may also use available sources to carry out due diligence checks to meet money laundering regulations. If you withdraw consent, we will continue to maintain a core set of personal data comprising very brief information to ensure that we do not inadvertently contact you in future. The College has a legal obligation to supply some of the information we hold about you, as a graduate, to the Higher Education Statistics Agency (HESA) – the official agency for the collection, analysis and dissemination of quantitative information about higher education in the United Kingdom. HESA will treat your data in line with its collection notices. HESA produces official statistics and its outputs are regulated by the UK Statistics Authority, which has a direct line of accountability to Parliament.
- **GDPR Article 6.1(f) -Processing is necessary for the pursuit of our legitimate interests.**
Processing of student record data for alumni under legitimate interests for the purpose of monitoring our academic services and providing you with information (e.g. copy of transcript, confirmation of degree etc.) is covered in the Student Privacy Notice.

Who do we share your personal data with? What data do we share?

On occasion we may need to share your data internally and with third parties. The following table lists what information we may share with whom.

| Recipients | Data which we may share with them |
|--|---|
| Our staff | Contact details, course information, and, where necessary for the implementation of reasonable adjustments and/or the provision of other support and subject to your consent, health information. |
| Our administrative/ IT staff associated with alumni/ supporter activities | Contact details, course information, and, where necessary for the implementation of reasonable adjustments and/or the provision of other support and subject to your consent, health information. |
| Volunteer partners associated with alumni/ supporter activities | Contact details and course information |
| College clubs and societies | Contact details and course information |
| Data processors i.e. third parties who process personal data on our behalf e.g. software providers, event booking providers etc. (e.g. Eventbrite) | Contact details and course information |

How are we protecting your personal data?

Your personal data is held securely on the College of Central London's database,

which is accessible by a limited number of staff and is secured. Any transfer of your personal data outside the European Union will be subject to the Privacy Shield protections. Further information about Privacy Shield can be found at <https://www.privacyshield.gov/welcome>.

We ensure we have appropriate data sharing agreements in place before sharing your personal data.

We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them.

The College of Central London is committed to working in a transparent, ethical, responsible and honest way.

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 completed;
- to have your personal data erased. This is a limited right which applies, among other circumstances, when the data is no longer required 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;
- to object to the processing of your personal data when such 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 will apply in specific circumstances and for a limited period; and
- to ask for the transfer of your data electronically to a third party.

How long is your personal data kept?

Personal data in support will be kept until there is no longer a legal basis for holding it, until you object to the processing of your data or until you withdraw your consent.

If you ask us to delete your personal data, we will continue to maintain a core set of

personal data comprising very brief information to ensure that we do not inadvertently contact you in future. We may also need to retain some financial records for statutory purposes.

How can you maintain your personal data?

You can update, amend or correct the data we hold about you by contacting the Alumni and Development Department by email, phone or post. You can also change your communication preferences at any time to restrict how we process your data, or opt out of some or all communication. We will also review your consent and preferences at least every two years.

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 Data Protection Officer:

Data Protection Officer

Address: Tower Bridge Business Centre 46-48 East Smithfield London E1W 1AW

Complaints to the Information Commissioner

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

Changes to our privacy Policy

Any changes we make to this privacy notice in the future will be [posted on this page] and, where appropriate, notified to you by e-mail.

Who regulates the use of my personal information?

The College of Central London maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with the Data Protection Legislation. The College of

Central London's registration number is Z7344788 and sets out, in very general terms, the full range of purposes for which we use, staff and all other personal information. Please visit the [Information Commissioners Office](#) website for details.

Who do I contact with questions?

The data controller for the purposes of the General Data Protection Regulation is the College of Central London. If you have any questions or concerns about how your personal data is used, please email the college Principal at ccl@central-college.uk

If we are unable to adequately address any concerns you may have about the way in which we use your data, you have the right to lodge a formal complaint with the UK Information Commissioner's Office. Full details may be accessed on the complaints section of the [ICO's website](#)