

## PRIVACY NOTICE

TLG takes the protection of your personal data very seriously and are committed to protecting and respecting your privacy.

When processing your personal data, TLG is obliged to fulfil individuals' reasonable expectations of privacy by complying with the General Data Protection Regulation 2016/679 (UK 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.

TLG (also referred to in this notice as "we" or "us") is a Data Controller (which means we are responsible for deciding how we hold and use your personal information) of your data, and is part of The Global University Systems B.V. group of companies which is made up of different legal entities, details of which can be found at <https://www.globaluniversitysystems.com>.

**"Personal data"** refers to information relating to a living, identifiable individual. It can also include "special categories of data", which is information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, genetic data, biometric data, data concerning sex life or sexual orientation, the processing of which is subject to strict requirements. Similarly, information about criminal convictions and offences is also subject to strict requirements.

**"Processing"** means any operation which we carry out on your personal data e.g. obtaining, storing, transferring and deleting.

### Your personal information

We hold a range of personal data about you, some of which you provide to us direct and some of which we receive from third parties, such as UCAS, where relevant. **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 TLG 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 lawful 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 academic or professional programmes.

If you take up a place at TLG, 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 TLG, 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. A failure to provide that information would prejudice your application for a Tier 4 visa.

No	Purpose	Lawful 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
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	Contractual necessity and legitimate interest in assisting our students to succeed in their studies

No	Purpose	Lawful basis/ justification
	succeed in their learning via the online system.	
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 appeals, interruption and withdrawal, fitness to study and fitness to practice procedures.	Contractual necessity
9	Immigration matters.	Necessary for us to comply with our legal obligations in relation to students who hold Tier 4 visas. Such processing may also be in the public interest.
10	Making reasonable adjustments for disabilities and providing relevant support to students with ill health and providing wellbeing support. This includes processing special category information.	Explicit consent.
11	Employability Support	Contractual necessity and our legitimate interest in assisting our students and alumni to progress in their careers.

No	Purpose	Lawful basis/ justification
12	Regulating TLG's community (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 of the TLG community.
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, our legitimate interest in promoting student welfare, and consent for marketing TLG
17	Registering alumni to maintain an alumni network	Necessary for our legitimate interests in maintaining an alumni network, and consent for marketing
18	To facilitate data gathering to improve our educational services, our website, and our marketing efforts.	TLG's legitimate business interests such as managing and developing its business
19	Processing of criminal conviction data during an appeal.	Performance of a contract for the purpose of the appeal. Safeguarding of individuals at risk under the Data Protection Act 2018 Schedule 1.

There may be other processing in addition to the above, for example, when you access our website which uses cookies or when we take photos of our events and publish them. This is done on the basis of our policies and we will inform you about such processing at the time when the data is obtained or as soon as reasonably possible thereafter. We also record some inbound and outbound telephone calls for training and monitoring purposes.

Where the basis of processing your personal data is contractual necessity and you fail to provide the personal data in question, TLG may not be able to process your application or provide you with the programme for which you have applied. A failure to provide immigration related data may result in failure to obtain a Tier 4 visa for those who students who require it.

#### Personal data received from third parties

No	Data	Source
1	Contact details and attainment.	Associate partners, call agents
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	Your financial status.	Student Loans Company.
6	Details of any TLG associated complaint	Office of the Independent Adjudicator, and/or Competition and Markets Authority
7	Information required to assess eligibility for courses i.e. from employers or sponsors.	Employers or sponsors.

No	Data	Source
8	Details as to how you are performing in your apprenticeship job.	Your employer if you are an apprentice
9	Details as to how you are performing on placement.	Your placement provider
10	Details of performance at a partner institution including attendance and disciplinary issues.	International study abroad or exchange programme partner or collaboration partner.

#### 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	Placement providers and partners	Your CV as well as any accessibility and assistance requirements and related information.
2	Co-curricular and/or extracurricular excursion providers	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	Your employer or sponsor if you are a sponsored student.	Details as to how you are performing and attendance in your course.
5	External examiners.	Identification details and exam papers.
6	Turnitin.	Identification details and assessment papers in order to detect plagiarism
7	Education and Skills Funding Agency if you are an apprentice.	Student details including course and employer information and academic progression.
8	End point assessor if you are an apprentice	Identification details and assessment details.
9	UK Home Office	Passport details; contact details; programme details including attendance, placement details and work experience; fees and housing details
10	Data processors i.e. third parties who process personal data on our behalf e.g. software providers or	Application details; attendance records or contact details which are not retained by the third party

No	Recipients	Data which we may share with them
	marketing service providers	
11	Local Authority (including the electorate office).	Contact details and course details where there's a legal basis.
12	Student Loans Company.	Contact details and course details including progression.
13	TLG'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.
14	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
15	Government agencies i.e. HMRC*	Contact details and potentially other information if requested where there is a legal basis.
16	Police*.	Contact details and potentially other information if requested where there is a legal basis.



No	Recipients	Data which we may share with them
17	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 TLG could be required to supply in order to comply with the Counter Terrorism and Security Act 2015.
18	Potential employers or other companies requesting a reference or confirmation of qualifications	Attendance, progression and performance details including disciplinary processes.