

**Short Course Student Privacy Notice**

**About this document**

This privacy notice explains how St Mary’s University ("we", "our", "us") collects, uses and shares your personal data, and your rights in relation to the personal data we hold. This privacy notice concerns our processing of personal data of past, present and prospective students of St Mary’s University ("you", "your").

St Mary’s University is the data controller of your personal data and is subject to the General Data Protection Regulation (the "GDPR").

**Who is this Privacy Notice intended for?**

This privacy notice is intended for:-

1. Short Course students currently studying at the University.
2. Prospective short course students of the University.
3. Former short course students of the University.

**How we collect your information**

We may collect your personal data in a number of ways, for example:

* from the information you provide to us when you interact with us before joining, for example when you express your interest in studying at St Mary’s University;
* when you apply to study at St Mary’s University and complete application forms via Eventbrite, by phone or by paper and when you complete other admissions processes and procedures;
* when you communicate with us by telephone, email or via our website, for example in order to make enquiries or raise concerns;
* in various other ways as you interact with us during your time as a short course student of St Mary’s University, for the various purposes set out below;

**The types of information we collect**

We may collect the following types of personal data about you:

* your name, and contact information such as address, email address and telephone number, as well as your date of birth. We may also allocate you a unique student number;
* information relating to your education, dates of study and examination results. We will also keep records relating to assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record;
* sensitive personal data including:
	+ information concerning your health and medical conditions (e.g. disability and dietary needs);
	+ information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation.

**How we use information about our students**

The purposes for which we may use personal data (including sensitive personal data) we collect during a student's association with us include:

* recruitment and admissions;
* academic matters, including:
	+ the provision of our core teaching, learning and research services (e.g. registration, assessment, attendance, managing progress, academic misconduct investigations, certification);
	+ maintaining student records;
* providing library, IT and information services;
* non-academic matters in support of our core services, including:
	+ providing student support services (e.g. Additional Learning Support, Careers, Wellbeing Service, personal tutors and academic departments);
	+ monitoring equal opportunities;
	+ safeguarding and promoting the welfare of students;
	+ ensuring students' safety and security;
	+ managing the use of social media;
	+ managing car parking on campus;
* administering finance
* other administrative purposes, including:
	+ carrying out research and statistical analysis;
	+ carrying out audits (e.g. to ensure compliance with our regulatory and legal obligations);
	+ providing operational information (e.g. providing IT support, information about building closures or access restrictions on campus, or safety advice);
	+ promoting our services (e.g. providing information about summer schools, student exchanges, or other events happening on and off campus);
	+ preventing and detecting crime;
	+ dealing with grievances and disciplinary actions;
	+ dealing with complaints and enquiries.

**The basis for processing your information and how we use it**

We may process your personal data because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract. In this respect, we use your personal data for the following:

* to interact with you before you are enrolled as a short course student, as part of the admissions process (e.g. to answer enquiries about our courses);
* once you have enrolled, to provide you with the services in accordance with the contract you have with us;
* to deal with any concerns or feedback you may have;
* for any other purpose for which you provide us with your personal data.

We may also process your personal data because it is necessary for the performance of our tasks carried out in the public interest or because it is necessary for our or a third party's legitimate interests. In this respect, we may use your personal data for the following:

* to monitor and evaluate the performance and effectiveness of the university, including by training our staff or monitoring their performance;
* to maintain and improve the academic, corporate, financial, estate and human resource management of the university;
* to promote equality and diversity throughout the university;
* to seek advice on our rights and obligations, such as where we require our own legal advice;
* recovering money you owe to us;
* for fundraising purposes.

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

* to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements;
* for the prevention and detection of crime;
* in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal data where:

* it is necessary for medical purposes (e.g. medical diagnosis, provision of health or social care or treatment, or a contract with a health professional);
* it is necessary to protect your or another person’s vital interests; or
* we have your specific or, where necessary, explicit consent to do so.

**Sharing information with others**

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. You are given the opportunity to opt out of some of these data sharing arrangements, for example when you register with us, but you should carefully consider the possible impact of doing this. Unless an opt-out is in place, we may disclose limited personal data to a variety of recipients including:

* our employees, agents and contractors where there is a legitimate reason for their receiving the information, including:
	+ any third parties who work with us to provide student support services (e.g. counselling);
	+ third parties who are contracted to provide IT services for us;
	+ organisations operating anti-plagiarism software on our behalf;
	+ internal and external auditors.
* those with an interest in tracking student progress and attendance, including:
	+ professional and regulatory bodies (e.g. ITEC) in relation to the confirmation of qualifications, professional registration and conduct and the accreditation of courses;
	+ government departments and agencies where we have a statutory obligation to provide information (e.g. the Office for Students, the Higher Education Statistics Agency (HESA), the Home Office (in connection with UK visas and immigration), Council Tax and Electoral Registration Officers at relevant local authorities (for the purpose of assessing liability for Council Tax and for electoral registration purposes));
	+ crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions and Trading Standards);
	+ parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure such as an emergency situation);
	+ third parties conducting surveys, for example the National Student Survey.

**International data transfers**

Some of the personal data we process about you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), for example where it is processed by staff operating outside the EEA who work for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA or who uses storage facilities outside the EEA.

In these circumstances, your personal data will only be transferred on one of the following bases:

* where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission);
* a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
* there exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

**Changes to your personal data**

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details. You can do this by emailing shortcourses@stmarys.ac.uk.

**How long your information is kept**

Subject to any other notices that we may provide to you, we may retain your personal data for a period of six years after your association with us has come to an end. However, some information may be retained indefinitely by us in order to maintain your academic record for archiving purposes (or by the Alumni and Development Office for the purposes of supporting your lifelong relationship with St Mary’s University).

**Your rights**

Under the GDPR you have the following rights:

* to obtain access to, and copies of, the personal data that we hold about you;
* to require that we cease processing your personal data if the processing is causing you damage or distress;
* to require us not to send you marketing communications.
* to require us to correct the personal data we hold about you if it is incorrect;
* to require us to erase your personal data;
* to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
* to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
* to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact our Data Protection Officer using the contact details set out below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

**Contact us**

If you have any queries about this privacy notice or how we process your personal data, you can contact our Data Protection Officer by email foi@stmarys.ac.uk ; by telephone: +44 (0) 20 8240 4267; or by post: Clerk to the Board of Governors, St Mary’s University, Waldegrave Road, Twickenham TWI 4SX.

To request access to the personal data that we hold about you, you may contact our Data Protection Office by email foi@stmarys.ac.ukby telephone: ++44 (0) 20 8240 4267; or by post: Data Protection Officer, St Mary’s University, Waldegrave Road, Twickenham TWI 4SX.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner.

You can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: [www.ico.org.uk](http://www.ico.org.uk/).