

Kingston University Data Protection Privacy Notice for Enquirers, Applicants, Students and Alumni

What is this privacy notice about?

This privacy notice explains how Kingston University ("we", "our", "us") collects, uses and shares your personal data (information) and your rights in relation to this data. The notice relates to our processing of personal data of enquirers, applicants, students and alumni of Kingston University ("you", "your").

This privacy notice answers the following questions:

- [How do we collect your information?](#)
- [What types of information do we collect about you?](#)
- [How will we use your information?](#)
- [What legal basis do we have for processing your information?](#)
- [Who will we share your information with?](#)
- [For how long do we keep your information?](#)
- [What are your rights?](#)
- [Who can you contact about your information?](#)

Kingston University is the data controller of your personal data and is subject to the General Data Protection Regulation (the "GDPR") from 25 May 2018 and a new UK Data Protection Act. We may update this privacy notice periodically and if we do we will publish this on our website. The latest version of this privacy notice was updated on 18 May 2018 and can be found on the [Information Regulations](#) section of our website.

We submit a notification of our data processing activity to the Information Commissioner's Office (ICO), specifying in general terms the classes, subjects, sources and recipients of data processed in the course of normal institutional functioning (registration number Z7456228). Our entry can be found in the online [ICO register](#).

How do we collect your information?

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

- from the information you provide to us before you join (for example, when you express your interest in studying at Kingston University or you attend an open day);
- from third party organisations through which you have an expressed an interest in studying (for example, international representatives and agents, FindAMasters, Prospects, Hotcourses and the Student Room);

- when you apply to study at Kingston University directly, via the Universities and Colleges Admissions Service (UCAS), or other admissions processes;
- when you communicate with us by telephone, email, social media or via our website (for example, in order to make enquiries or raise concerns);
- when you interact with us during your time as a student of Kingston University, for the reasons set out in [‘How will we use your information?’](#) below;
- from other educational or employment organisations (for example, from your previous or current school, sixth form college, university or employers who may provide a reference about you or sponsor your studies);
- from publicly available information sources (for example, social media sites, Companies House and data cleaning agencies).

What types of information do we collect about you?

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, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality. We will also allocate you a unique student number and an identity card (if you complete the enrolment process);
- information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, 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;
- information about your family or personal circumstances, and both academic and extracurricular interests (for example, where this is relevant to the assessment of your suitability to receive a bursary, in order to provide you with appropriate pastoral care, or to make you aware of extracurricular activities and events that are relevant to your interests);
- special category (sensitive) personal data and information about criminal convictions and offences, including:
 - information concerning your health and medical conditions (for example, disability and dietary needs);

- criminal convictions where required for certain programmes of study or prior to certain placements (for example, where a Disclosure and Barring Service check is required);
 - unspent criminal convictions which if declared will require a risk assessment based on the seriousness and nature of the crime, this could involve consulting your probation officer or similar professional;
 - information about your racial or ethnic origin; religion or similar beliefs;
 - sexual orientation;
- applications, CVs and information relating to graduate outcomes and your career progress after you leave the University.

How will we use your information?

We use your personal data in different ways depending on the stage of your interaction with us (for example, we may process information when you enquire or apply, when you are a student, at the time of your graduation and after you leave the University).

How will we use the information in your enquiry or application?

We collect your personal data when you make an enquiry as a prospective student. Your data will be used for the purposes of dealing with your enquiries or application, as well as sending you relevant information about Kingston University (for example, we may send you a survey if you are an offer holder). In some cases we may keep hold of that personal data for use in future contacts (for example, data obtained during the enquiry process may be linked with data subsequently collected if you enrol as a student).

Your personal data may also be transferred to and stored by companies working on behalf of Kingston University including:

- [UniQuest](#), which is an educational services company providing conversion services;
- Net Natives, which is an advertising company;
- In2Events and dotmailer for the purposes of distributing mailouts and emails;
- a company that prints and distributes prospectuses and other marketing materials for the University.

The information you provide to us in your application is used for the purposes of recruitment and admissions and to assess your eligibility for other reasons including bursaries and accommodation. If you become a student at Kingston University this

information will be retained for the purposes listed below in [‘How will we use your information while you are a student?’](#). If you do not become a student at Kingston University we will retain your information for the period set out in our [retention schedule](#) after which the data will be deleted or anonymised so that we can use it for statistical purposes.

How will we use your information while you are a student?

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

- academic matters, including:
 - the provision of teaching, learning and research services (for example, registration, assessment, engaging with learning resources, managing progress, academic misconduct investigations and certification);
 - maintaining student records;
 - learning analytics including attendance;
 - assessing your eligibility for bursaries, scholarships and similar awards;
 - research (for example, academic research, evaluation research, student surveys and market research).
- providing library, IT and information services;
- non-academic matters in support of our academic services, including:
 - careers and employability-related analysis (for example, understanding skills and future plans);
 - safeguarding, promoting the welfare of students and providing student support services, including through any external partners (for example, the Fairhill Medical Practice and More Energy fitness centre);
 - ensuring students' safety and security including the use of CCTV;
 - managing student accommodation;
 - managing car parking on the campuses;
 - managing the use of social media;
 - monitoring equal opportunities (for example, gender equality).

- administering finance (for example, fees, scholarships and bursaries);
- processing data and handling claims in relation to insurance (for example, travel insurance for students trips);
- other administrative purposes, including:
 - institutional research or statistical analysis undertaken primarily for the benefit of the institution (for example, to support operational decision-making);
 - carrying out audits (for example, to ensure compliance with our regulatory and legal obligations);
 - providing operational information (for example, providing IT support, information about building closures or access restrictions on campus, or safety advice);
 - promoting our services (for example, providing information about summer schools, student exchanges, or other events happening on and off campus);
 - preventing and detecting crime (for example, detecting fraud);
 - dealing with grievances and disciplinary actions;
 - dealing with complaints and enquiries (for example, queries sent via email or live chat helpdesks).

How will we use your graduation and degree information?

We will publish your personal data in the graduation ceremony programme. This information will also be passed to third parties involved in the ceremonies (for example, commemorative clothing suppliers).

The level of award only (for example, BA or MA) not the classification (for example, first or second class) is published in the printed graduation brochure available on the day. The level of award is not announced during the ceremony, only the graduate's name.

If you want to object to your personal data being processed for these purposes please contact the Graduations Team when you receive your invitation:

graduations@kingston.ac.uk.

Graduates and guests should be aware that the graduation ceremonies are regarded as public events. The event will be filmed and photographed and images may be used for Kingston University publicity purposes. You can find our [graduation policy](#) online.

What will happen to your information when you leave Kingston University?

We retain some of your information to maintain a record of your academic studies. Before you leave the careers service will check whether we can contact you once you have left to offer careers-related support. In addition, we pass some of your personal data to our Development, Alumni Relations and Events team ("DARE") team. In order to maintain your lifelong relationship with us, DARE will retain this personal data indefinitely. Further information on this processing is included in the [DARE section](#) below.

What legal basis do we have for processing your information?

For a contract

We process some of 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 student, as part of the enquiries and admissions process (for example, to send you a prospectus or answer enquiries about our courses);
- once you have enrolled, to provide you with the services as set out in our student agreement;
- to deal with any concerns or feedback you may have;
- for any other purpose for which you provide us with your personal data.

For public interest

We process your personal data because it is necessary for the performance of our tasks carried out in the public interest as an education provider in line with our Instrument and Articles of Government and our Strategic Plan. In this respect, we may use your personal data for the following:

- to provide you with educational services set out in our student agreement with you;
- to provide you with educational services that may not be set out in our student agreement but which are nevertheless a part of our academic and educational mission;

- to retain a record of your studies (for example, core student data to confirm your attendance and grades achieved);
- 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;
- to recover money you owe to us.

For legitimate interest

We process your personal data because it is necessary for the purpose of a legitimate interest pursued by us or one of the third party organisations that we work with. In this respect, we may use your personal data for the following:

- for activity related to your graduation (for example, publishing your name in the graduation programme);
- for alumni relationship management activity (for example, contacting you to participate in non-statutory surveys and for providing careers support);
- for fundraising purposes;
- for marketing purposes.

To comply with legal obligations

We 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 immigration laws, anti-money laundering laws, safeguarding requirements, reporting requirements required by law or to regulatory bodies including the Office for Students;
- 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.

Other legal bases

We may also process your personal data where:

- we have your specific or, where necessary, explicit consent to do so (for example, when you express an interest in our courses, or when you agree to us contacting you about careers services after you leave);
- it is necessary for medical purposes (for example, 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;
- it is used for historical, statistical or scientific purposes including special category (sensitive) personal data (for example, with regards to national higher education surveys).

Who will we share your information with?

For the purposes referred to in this privacy notice and relying on the legal bases for processing as set out above, we may share your personal data with certain third parties listed below.

Within the University and third parties

We may disclose limited personal data to recipients including:

- our employees, representatives and contractors where there is a legitimate reason for their receiving the information, including:
 - third parties that help us store and process enquiries and help to compile applications from prospective students (for example UniQuest and/or our international recruiting representatives working on our behalf);
 - third parties who work with us to enable us to deliver educational services;
 - third parties who work with us to provide student accommodation;

- third parties who work with us to provide student support services (for example, counselling);
- organisations operating anti-plagiarism software on our behalf (such as Turnitin);
- internal and external auditors.
- those with an interest in tracking student progress and attendance, including:
 - student sponsors (for example, the Student Loan Company, research sponsors and Research Councils);
 - current or potential education providers (for example, where you take part in an exchange programme as part of your course);
 - current or potential employers (to provide references and, where students are sponsored by their employer and/or where you take part in a placement, to provide details of progress and/or attendance);
- professional and regulatory bodies in relation to the confirmation of qualifications, professional registration, conduct and the accreditation of courses and schools;
- government departments and agencies where we have a statutory obligation to provide information (for example, the Office for Students, the Higher Education Statistics Agency (HESA), the Home Office (in connection with UK visas and immigration), and council tax and electoral registration officers at relevant local authorities;
- St George's, University of London, where it relates to the Faculty of Health, Social Care and Education, which is a joint faculty with Kingston University;
- where applicable, Kingston University's other [UK and international partners](#);
- NHS trusts, NHS foundation trusts and Local Authorities (for the purpose of assessing whether you are entitled to free NHS treatment);
- crime prevention or detection agencies (for example, the police and the Department for Work and Pensions);
- parents, guardians, and next-of-kin only where there is a legitimate legal basis for disclosure (for example, where you give us your consent to do so, or in a medical emergency to protect your vital interests);
- third parties conducting surveys (for example, the National Student Survey and the Graduate Outcomes Survey).

Development, Alumni Relations and Events (DARE)

When you leave Kingston University, some of your personal data will be transferred to the alumni database, which is managed by the DARE team within Kingston University. This includes name, nationality, date of birth, gender, details of your studies with us (for example, award details and fee status), previous institution(s) attended and your contact details (for example, postal address, phone number and email address).

This information will be used for alumni activities, including marketing, sending Kingston University publications, and the promotion of alumni benefits, services, events and our fundraising programmes.

We may disclose limited personal data to our contractors for analysis in connection with fundraising activities including for data matching to enhance and update the data we hold on you from public sources. This may include an assessment of your ability and willingness to make donations to particular projects or the University more generally. All of these activities are undertaken to ensure that we are working in a cost-effective manner and to allow us to raise more funds in support of the University's aims.

For more specific information about how your personal data is used by DARE, please see the [Alumni Privacy Notice](#).

If you do not want your personal data to be used for any of these purposes, please email: alumnidatabase@kingston.ac.uk.

Marketing

Under GDPR the processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest. Marketing is also governed by the Privacy and Electronic Communication Regulations 2003 (PECR).

We may use your personal data for marketing processes, which includes passing your details to a third party to anonymise the data. This data is then used to help us to target our marketing activities. We do not sell your data to other organisations for marketing purposes or any other purposes.

During your time as a student we will also use your personal details to alert you to events and services of relevance to your studies and interests (for example, via the KU Extra portal).

HESA

We will send some of the student information we hold to the Higher Education Statistics Agency ("HESA"). HESA collects and is responsible for the database in which HESA student records are stored. Details of how HESA will process this information can be found on their [website](#).

National Student Survey and leaver surveys

We may pass student contact details to survey contractors to carry out the National Student Survey and surveys of student views and finances for the organisations identified by HESA in their data protection privacy notices referred to above. These organisations and their contractors will use student's details only for this purpose, and will then delete them.

Students may also be included in surveys that track the progress of leavers in the years after they graduate. If so, we will pass your contact details to the organisation that has been contracted to carry out that survey. The organisation will use your details only for that purpose and will then delete them.

Students' Union

We share some of the information we hold about you (including your name, date of birth, nationality, Kingston University email address and programme of study) with the Union of Kingston Students unless you opt out of Students' Union membership. You should refer to their privacy notice for further details.

Information transferred overseas

Some of the personal data we process about you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). These processes include where the personal data is processed by our staff, contractors or suppliers who are based outside the EEA or who use 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 (for example, 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 data protection;

- there exists another situation where the transfer is permitted under applicable law (for example, where we have your explicit consent).

For how long do we keep your information?

You can access the University [retention schedule](#) on our website.

In the absence of a retention period in the University's retention schedule and any other privacy notices that we may provide to you, we will retain some of your personal data indefinitely in order to maintain your academic record or to support your alumni relationship with Kingston University.

How do you make sure my information remains accurate?

It is important that the personal information we hold about you remains accurate. We cleanse and refresh our datasets including through the use of information from publicly available sources. Our commitment to data quality is set out in our [data quality policy](#), which can be accessed on our website. In addition, please tell us as soon as possible about any changes to the information we hold about you. This is particularly important for your contact details.

What are your rights?

Under the GDPR and when the new UK Data Protection Act comes into force, you have the following rights:

- to access from us the personal data we hold about you;
- 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 your personal data, which you provided to us, in a structured, commonly used and machine-readable format and the right to transmit that data to another 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;

- to not be subject to a decision based solely on automated processing, including profiling, which has a legal effect on you.

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.

Who can you contact about your information?

If you wish to request access to the personal data we hold about you please use the [Subject Access Request Form](#) available online. For any other queries about this privacy notice or how we process your personal data you can contact our Data Protection Officer by email: DPO@kingston.ac.uk or by post: Data Protection Officer, Vice Chancellor's Office, River House, 53–57 High Street, Kingston upon Thames, Surrey KT1 1LQ.

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.