

# **Prospective Students, Enquirers and Outreach Activity Privacy Notice**

The Royal Agricultural University (RAU) is a data controller and is committed to protecting your personal data and working in accordance with all relevant data protection legislation. This privacy notice explains how the University processes and uses the personal data we collect about prospective students and enquirers. Your data is used to help you to find out more about studying at the RAU, to give you relevant information about courses and how to apply and attend either short courses or to come to University as an undergraduate or postgraduate student. We also deliver outreach and widening participation programmes to schools and colleges which help their students to understand more about higher education.

The University will process your data in compliance with the General Data Protection Regulation (GDPR) which came into effect on 25<sup>th</sup> May 2018.

#### WHAT DATA DO WE HOLD?

The University may hold data relating to you from a number of sources. The majority of data we hold about you is given to us by you when you fill out an online or paper form.

### **OUR RECORDS MAY INCLUDE**

Education Details – for example what you studied at school.

Personal Identifiers and Biographical Information – for example your date of birth.

Contact Details – for example your address, email address and telephone number (we update these whenever you tell us they have changed)

Family Details – for example details about your parents.

Personal Details – for example disability and dietary preferences for event management purposes.

Your Preferences – to help us engage you in the ways most relevant to you, for example, whether you prefer emails or text messages.

Any other personal data required to carry out the legitimate business of the University.

## Sensitive personal information

If we ask you for sensitive data such as: racial or ethnic origin, political opinions, religious or philosophical beliefs, data concerning health, we will use these data because:

You have given the RAU explicit consent to do so

The RAU will use personal data which you have knowingly made public

The RAU need to use this data for scientific or research purposes.

#### **CCTV**

If you attend an event or course on the RAU campus, your image may be recorded by our CCTV system. For our use of CCTV on campus, please see the CCTV policy.

### IP ADDRESSES, COOKIES AND YOUR DEVICES

We may collect information about the device/s you are using to access our online services, the operating system and browser type used and your IP address. This is intended to provide aggregated data about users' behaviours and does not identify any individual. It is used to inform improvements to the website, for system administration, and to report aggregate information to third party sub-contractors we may be working with in areas such as advertising, search information providers, analytics providers or in technical delivery services.

We may also obtain information about your general internet usage relating to our websites by using a pixel or a cookie file, which is stored on the hard drive of your computer. Again this is used to provide aggregated data on how users access and navigate our websites, and to assess their usefulness. Personal information about you is not collected during the tracking process.

### **HOW DO WE USE YOUR DATA?**

We require your data so that we can monitor and evaluate who is engaging with our website and the resources available, and give you the best service possible. If you are applying for a course, we require your data in order to ensure that you are eligible for the course and to direct you to relevant information. We will also use your data to communicate with you about courses you have expressed an interest in, or that we think may be relevant for you.

We need a range of personal data for students who apply to and/or participate in our outreach and widening participation programmes. This data is required to ensure that: the programmes are targeted correctly; we have all the information necessary for students to be safe and have a positive experience; we can conduct research on the success of outreach and widening participation programmes; we can provide information and evidence to funding bodies, for example the Office for Students.

### **LEGAL BASIS FOR PROCESSING**

The RAU's legal basis for collecting and processing your data are set out below.

The legal basis for processing students' personal data collected during the course of delivering outreach and widening participation activities is so that we can carry out our **public task** as a University. This data is used to develop public understanding about widening participation issues and to enable accountability for our use of public funding. In addition, the data is used to ensure that the events are organised and delivered in a safe way and to ensure that students have the best possible chance of benefiting from them.

We may use some of your data to carry out our **public task** as a university (including delivering courses) or under a **legal obligation**. We may also share your data with third parties such as the Office for Students (OfS) – see "How will we share your data" below.

Some tasks carried out with your data may be in our **legitimate interests** or the legitimate interests of a third party (such as one of our overseas recruitment agents) to deliver higher education, to recruit students and to run appropriate events — under this basis we will use your information in a way in which you would reasonably expect and which will have a minimal privacy impact.

Another reason for why we process your data is that you **consent** to providing it to us. If you are under the age of 13, we will ask for the consent of your parent or legal guardian in order to collect and process your data.

If you go on to apply for a course (either short or a diploma or degree) or visit, the legal basis for processing this data is that we will have a **contract** between us for us to deliver the course, and under our role as a public authority delivering higher education. You can find more information about how we will process your data as a student in our Applicants and Registered students privacy notice on the website.

#### **HOW DO WE PROTECT YOUR DATA?**

Your data is held securely on the RAU's file storage system, which is only accessible by authorised members of staff. All staff who access data have completed the University's data protection training.

The University ensures that appropriate data sharing agreements are in place prior to sharing your personal data with any partners.

### **HOW WILL WE SHARE YOUR DATA?**

The personal data that we ask you for, such as name, date of birth, and your home postcode, as well as some of your sensitive personal data such as racial or ethnic origin we will use to link your information to data held in national datasets so that we can see whether our activities have an effect upon your later educational and employment outcomes. As part of our evaluation, and the wider national evaluation, your data may be shared with:

- The Office for Students (OfS)
- The Higher Education Access Tracker (HEAT)
- The Higher Education Statistics Agency (HESA)
- National Pupil Database (NPD)
- University and Colleges Admissions Service (UCAS)
- National Collaborative Outreach Programme consortia

We may also share your data with:

- Other companies within the RAU group of companies including for fraud prevention purposes
- Technology service partners our partners who provide IT and website services
- Visa assessment companies our partners who work with us to administer your account and provide you with any help you may need when applying to study in the UK
- Regulators and other governmental agencies or law enforcement agencies
- Debt collectors, tracing agencies, debt purchasers or organisations providing debt support –
  our partners who help us to recover debts, who purchase debts or who offer debt advice
  and support.

Data is only shared in support of the work of the University and is never shared with anyone to enable other charities to contact individuals. We will only share your data with third parties who adhere to appropriate data security standards and controls.

The University does NOT sell data to third parties or allow third parties to sell on data where data is shared with them.

If you are a non-EU student we may share your data with our national partners to help them to facilitate your application.

#### WILL WE SHARE YOUR DATA OUTSIDE THE EU?

We will only share your data outside the EU if you are enquiring or applying as a person not living in the EU. For further information on how data can be transferred to other countries, please see the European Commission website: https://ec.europe.eu/info/law/law-topic/data-protection en

### **APPLICATIONS FOR STUDY**

In order to process your application and during our relationship with you, we will perform identity checks on you with one or more credit reference agencies.

To do this, we will supply your personal information to Credit Reference Agencies (CRAs) and they will give us information about you. CRAs will supply to us both public (including the electoral register) and shared credit, financial situation and financial history information and fraud prevention information.

We will use this information to:

- Verify the accuracy of the data you have provided to us
- Prevent criminal activity, fraud and money laundering
- Trace and recover debts (where appropriate)

The identities of the CRAs, their role also as fraud prevention agencies, the data they hold, the ways in which they use and share personal information, data retention periods and your data protection rights with the CRAs are explained in more detail at:

• Call Credit - <u>www.callcredit.co.uk/crain</u>

- Equifax www.equifax.co.uk/crain
- Experian www.experian.co.uk/crain

#### **FRAUD PREVENTION**

Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.

What We Process & Share

The personal data you have provided, we have collected from you, or we have received from third parties may include your:

- Name
- Date of birth
- · Residential address and address history
- Contact details such as email address and telephone numbers
- Employment details
- Identifiers assigned to your computer or other internet connected device including your Internet Protocol (IP) address

Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud risk, your data can be held for up to six years.

### **Consequences of Processing**

If we, or a fraud prevention agency, determine that you pose a fraud risk, we may refuse to provide the services you have requested, or we may stop providing existing services to you.

A record of any fraud risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details above.

### **Data Transfers for fraud prevention**

Whenever fraud prevention agencies transfer your personal data outside of the European Economic Area, they impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area.

They may also require the recipient to subscribe to 'international frameworks' intended to enable secure data sharing.

### **HOW LONG DO WE KEEP YOUR DATA?**

Data collected as part of conducting outreach and widening participation programmes will be kept until students are aged 27 years. This is so that we can carry out research on the impact of student participation and identify the destinations of participants into forms of employment or further and/or higher levels of study.

We will keep your personal data for the purposes set out in this privacy notice and only for as long as any legal basis continue to apply. Below is a non-exhaustive list of some of the reasons we need to keep your data:

- Compliance with Anti-Money Laundering regulations
- Reporting obligations to the credit reference agencies
- Ensuring we have relevant information in the event of any queries or complaints
- To assist with the establishment, exercise or defence of legal claims

If you go on to study at the RAU, we may hold your data for longer – please see the Applicants and Registered students privacy notice on our website for full details of how we process student data.

### YOUR RIGHTS AND PREFERENCES

You have the right to:

- Ask us to see, correct or delete the data we hold about you.
- Object to specific data uses, as described above.
- Object to receiving communications and direct marketing.
- Ask for the transfer of your data electronically to a third party.

The University may contact you by post unless you request otherwise, and by telephone, text, email or other electronic means as you have previously consented.

If you no longer want to receive communications by post, telephone, text, email or other electronic means, please contact the Marketing Office on 01285 652531 or <a href="marketing@rau.ac.uk">marketing@rau.ac.uk</a>

When contacting us please provide your name and information about how you are connected with the University if requested, to help us to identify you. Please also specify if you wish to unsubscribe from all communications or from specific communication types or methods.

### OTHER INFORMATION

This privacy notice will be kept under review. Any changes will be updated on our website and communicated to you as appropriate. This privacy notice was last updated in March 2019.

The University's Data Protection Officer is responsible for monitoring compliance with relevant legislation in relation to personal data and can be contacted at <a href="mailto:dataprotection@rau.ac.uk">dataprotection@rau.ac.uk</a>

You can also contact the DPO if you have any queries or concerns about the University's processing of your personal data. You have the right to lodge a complaint with the Information Commissioner's Office at <a href="https://www.ico.org.uk/concerns">www.ico.org.uk/concerns</a>

### **Further information:**

If you have any questions regarding this privacy notice please do not hesitate to contact us on 01285 652531 or <a href="marketing@rau.ac.uk">marketing@rau.ac.uk</a>