

Privacy Policy

Kent International College Limited trading as University of Kent International College (UKIC) is a division operated by Oxford International Education Group.

Kent International College Limited t/a University of Kent International College (UKIC) has written this Privacy Notice to explain how we keep your data safe and respect your privacy. Below you will find information explaining how we do this: what data we process about you, why we process that data and the legal bases for processing that data.

Kent International College Limited t/a University of Kent International College (UKIC) is the data controller. If you have any questions please contact us:

Data Compliance Manager
Oxford International Education Group
259 Greenwich High Road
London SE10 8NB

protectingdata@oxfordinternational.com

We have appointed a Data Protection Officer whose role is to inform and advise us about, and to ensure that we remain compliant with, data protection legislation. The Data Protection Officer should be your first point of contact if you have any queries or concerns about your personal data.

Our current Data Protection Officer is Bulletproof Cyber Ltd who can be contacted as follows:

Address: Units H/J/K Arlington Business Park, Gateway 1000, Whittle Way, Herts, SG1 2FP; Phone number: 01438500090: Email address:

dposupport@bulletproof.co.uk

We also have an EU Representative who can be contacted as follows:

Rickert Rechtsanwaltsgesellschaft mbH
Kent International College Limited
Colmantstrasse 15
53115 Bonn
Germany

[Email: art-27-rep-kentinternational@rickert-services.uk](mailto:art-27-rep-kentinternational@rickert-services.uk)

Your Rights

Under certain circumstances, you may have certain rights regarding how your personal data is used and kept safe, including the right to:

Right of Access: You have the right to a copy of the information we hold about you.

Right to Object: You may object to the use of personal data if it would cause, or is causing, damage or distress. You have the right to object to any decisions taken using automated processes. You also you have the right to object to certain types of processing such as direct marketing.

Right to be Forgotten: Under certain circumstances, you can ask for the data we hold about you to be deleted from our systems.

Right to Rectification: If data we hold about you is inaccurate or incomplete, you have the right to correct or complete that data.

Right to Restriction of Processing: Where certain conditions apply you have a right to restrict the processing of data.

Right of Portability: You have the right to have the data we hold about you transferred to another organisation.

Some of these rights may not apply where we are legally obliged to keep or share your personal data. If you wish to exercise any of these rights, please contact our Data Compliance Manager (see below).

Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. To make a complaint, please email our Data Compliance Manager protectingdata@oxfordinternational.com. You can also contact our DPO at the address listed above (dposupport@bulletproof.co.uk)

Alternatively, you can make a complaint to the Information Commissioner's Office in the UK via the options listed below, although we would be grateful for the opportunity to address your concerns before you contact the ICO.

How to contact the ICO:

Report a concern online at <https://ico.org.uk/make-a-complaint/>

Call +44 303 123 1113

Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, UK

PRIVACY NOTICE FOR STUDENTS, PARENTS AND GUARDIANS

The table below shows the data that we process about students, the reasons for processing this data and the lawful bases for processing this data. Cells marked with an asterisk (*) indicate that parent or guardian data may also be processed in the same way, where a student requires parental consent.

| The data or type of data we process | The purpose of processing that data | The lawful bases for processing this data |
|--|---|---|
| Your name, date of birth, gender, addresses, email addresses and phone numbers. Your relationship to the student* | To identify you to communicate with you For marketing purposes For Debt collection purposes | Fulfilment of a contract with you Where you have given us consent Necessary for our legitimate interest (to promote our schools and our educational activities) Necessary for our legitimate interests (for the running of our business) |
| Your nationality, ethnic background, | | Fulfilment of a contract with you |

| The data or type of data we process | The purpose of processing that data | The lawful bases for processing this data |
|---|--|---|
| any special educational needs, special requirements or disabilities | To provide appropriate information and assistance for you | Compliance with a legal obligation Where you have given us consent |
| Next of kin and emergency contact numbers | To contact your family or close friends in the event of an emergency | To protect your vital interests |
| Your passport, BRP and visa details | To meet government immigration regulations | Compliance with a legal obligation |
| Bank account details* | To manage payments and refunds | Fulfilment of a contract with you |
| Your educational records and test or exam results from previous schools | To offer you the most appropriate courses | Fulfilment of a contract with you |
| Your medical information, including medications you take, allergies and | To help you manage your health while you are with us | Fulfilment of a contract with you Compliance with a legal obligation |

| The data or type of data we process | The purpose of processing that data | The lawful bases for processing this data |
|---|---|---|
| dietary requirements | | Where you have given us consent |
| Your educational records and test or exam results from UKIC | To manage your progress while studying with us | Fulfilment of a contract with you |
| Your attendance records and booking in/out records for school and residence | To meet government immigration and safeguarding regulations | Fulfilment of a contract with you Compliance with a legal obligation |
| | To assist with debt collection | Necessary for our legitimate interest (to manage school discipline and debt collection) |
| Details of fees paid and any amount owed | To assist with debt collection | Necessary for our legitimate interest (to assist with the running of our school) |
| Details of your welfare such as how you are getting on at University of Kent International College, | To look after your wellbeing and meet government safeguarding regulations | Fulfilment of a contract with you Compliance with a legal obligation |

| The data or type of data we process | The purpose of processing that data | The lawful bases for processing this data |
|--|-------------------------------------|--|
| safeguarding or child protection records and any problems or issues you may have had | | |
| Details of any behaviour issues or exclusions | To manage discipline in the schools | Necessary for our legitimate interests (to manage school discipline) |
| Images | For maintaining security | Necessary for our legitimate interest (for keeping our staff and students safe) |
| | For marketing our services | Where you have given us consent Necessary for our legitimate interest (to promote our educational activities and show prospective students/parents what we do here) |
| CCTV footage* | For security management | Necessary for our legitimate interests (to maintain building and personal security) |

| The data or type of data we process | The purpose of processing that data | The lawful bases for processing this data |
|---|--------------------------------------|--|
| Data about your use of information and communications systems, including Internet use | To meet our safeguarding obligations | Compliance with a legal obligation |
| | To administer and protect the school | Necessary for our legitimate interests (to secure our buildings) |

Where we have obtained consent to use student data, this consent may be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

WHEN DO WE SHARE STUDENT, PARENT OR GUARDIAN DATA?

When it is legally necessary, or allowed under data protection law, we may need to share information about you with the organisations listed in the table below, for the listed reasons.

| Organisation Name | The Reason for Sharing |
|---|--|
| Oxford International Education and Travel Ltd and other group companies | For our central teams (eg Finance, Marketing, Admissions) to manage student data on behalf of Kent International College Limited Ltd |
| The Department for Education | To provide data on international and domestic students |

| Organisation Name | The Reason for Sharing |
|--|--|
| The Local Education Authority | To provide data on international and domestic students |
| Regulatory bodies, such as Ofsted or the British Council | To comply with regulatory inspections |
| Service providers | For running surveys, providing taxi or excursion services, providing security services, debt collection |
| Financial organisations* | For processing payments |
| Our auditors | For carrying out legal audits of company accounts |
| Health and social welfare organisations | To manage student wellbeing |
| Professional advisers and consultants | To assist us in developing our business |
| Police forces, courts, tribunals* | For dealing with legal issues |
| Your family and representatives | To share details of your academic progress or to tell them about attendance or behaviour issues or for debt collection |
| Exam Boards | To enter you for exams |

| Organisation Name | The Reason for Sharing |
|---|---|
| UCAS | To enable you to apply to universities in the UK |
| Marketing services, such as those offered by Facebook | To identify other students who may be interested in studying with UKIC or any of the other Oxford International Pathways Colleges. No decisions will be taken about you based on this profiling |
| University Partners | To enable you to progress to your chosen course of study with the partner university |

TRANSFERRING STUDENT, PARENT AND GUARDIAN DATA INTERNATIONALLY

Your personal information may be stored and processed outside of the country where it is collected, including outside of the European Economic Area.

We will only transfer personal data to a country or territory outside the European Economic Area:

- where the transfer is to a place that is regarded by the European Commission as providing adequate protection for your Personal Information; or
- where we have put in place appropriate safeguards to ensure that your Personal Information is protected (for example where both parties involved in the transfer have signed standard data protection clauses adopted by the European Commission); or
- the above does not apply but we are still legally permitted to do so, for example if the transfer is necessary for the establishment, exercise or defence of legal claims.

You can request further detail about the safeguards that we have in place in respect of transfers of Personal Information outside of the EEA and where applicable a copy of the standard data protection clauses that we

have in place, by contacting us
at protectingdata@oxfordinternational.com

STORING STUDENT, PARENT AND GUARDIAN DATA

We will keep personal information about you while you are an active student. We create and maintain records for each individual student. The information contained in these records is kept secure and is only used for purposes directly relevant to your position as a student with Oxford International. Once your time as a student with us has ended, we will retain these records and delete them in accordance with our Data Retention Policy.

PRIVACY NOTICE FOR AGENTS

This privacy notice explains how we collect, store and use personal data about agents. Kent International College Limited t/as University of Kent International College (UKIC) is the data controller.

The table below shows the data that we process about agents and agencies, the reasons for processing this data and the lawful bases for processing this data.

| The data or type of data we process | The purpose of processing that data | The lawful bases for processing this data |
|--|---|--|
| Names, address, email addresses, phone numbers | To communicate with you about students you have sent to University of Kent International College (UKIC) to ensure you have up-to-date information so you can provide accurate information to potential students | Fulfilment of a contract with you |

| The data or type of data we process | The purpose of processing that data | The lawful bases for processing this data |
|---|---|---|
| Joining information, references | To register your agency with University of Kent International College | Necessary for our legitimate shared interests |
| Details of students you have sent to us | To administer our business, to manage agreed recruitment targets | Fulfilment of a contract with you |
| Images | For marketing our services | <p>Where you have given us consent</p> <p>Necessary for our legitimate interest (to promote our activities or advertise our services)</p> |
| CCTV footage | For security management if you have visited our schools | <p>Compliance with a legal obligation</p> <p>Necessary for our legitimate interests (to maintain building and personal security)</p> |
| Financial details, bank account information, commission agreements, payment records | To administer our business, to make commission payments | Fulfilment of a contract with you |

Where we have obtained consent to use agent data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

WHEN DO WE SHARE AGENT DATA?

When it is legally necessary, or allowed under data protection law, we may need to share information about you with the organisations listed in the table below, for the listed reasons.

| Organisation Name | The Reason for Sharing |
|---|---|
| Oxford International Education and Travel Ltd and other group companies | For internal reporting and auditing |
| The Department for Education | To provide data on international students |
| Regulatory bodies, such as Ofsted or the British Council | to comply with regulatory inspections |
| Service providers | For running surveys |
| Financial organisations | For processing payments |
| Our auditors | For carrying out legal audits of accounts |
| Health and social welfare organisations | To manage student wellbeing |
| Professional advisers and consultants | To assist us in developing our |
| Police forces, courts, tribunals | For dealing with legal issues |

TRANSFERRING AGENT DATA INTERNATIONALLY

Your personal information may be stored and processed outside of the country where it is collected, including outside of the European Economic Area.

We will only transfer personal data to a country or territory outside the European Economic Area:

- where the transfer is to a place that is regarded by the European Commission as providing adequate protection for your Personal Information; or
- where we have put in place appropriate safeguards to ensure that your Personal Information is protected (for example where both parties involved in the transfer have signed standard data protection clauses adopted by the European Commission); or
- the above does not apply but we are still legally permitted to do so, for example if the transfer is necessary for the establishment, exercise or defence of legal claims.

You can request further detail about the safeguards that we have in place in respect of transfers of Personal Information outside of the EEA and where applicable a copy of the standard data protection clauses that we have in place, by contacting us at protectingdata@oxfordinternational.com

STORING AGENT DATA

We will keep personal information about you while you are an active agent. We create and maintain records for each agent. The information contained in these records is kept secure and is only used for purposes directly relevant to your position as an agent for Oxford International. Once your time as an agent with us has ended, we will retain this file and delete the information in it in accordance with our Data Retention Policy.

PRIVACY NOTICE FOR JOB APPLICANTS

This privacy notice explains how we collect, store and use personal data about applicants. Kent International College Limited t/as University of Kent International College (UKIC) is the data controller.

The table below shows the data that we process about applicants, the reasons for processing this data and the lawful bases for processing this data.

| The data or type of data we process | The purpose of processing that data | The lawful bases for processing this data |
|--|---|---|
| Details that appear on CVs and cover letters such as names, address and date of birth, education/professional qualifications | To assess your suitability for the role you have applied for and for progressing your application | To perform an employment contract with you, in the event you are successful |
| Interview notes/results from assessments | To assess your suitability for the role you have applied for | Necessary for our legitimate interests (to make recruitment decisions) |
| References from former employers | A pre-employment check to assess your suitability for the role you have applied for | Necessary for our legitimate interests (to make recruitment decisions) |
| Right to work information | To assess your eligibility for the role you have applied for | Compliance with a legal obligation |
| Pre-employment checks such as criminal record checks | A pre-employment check to assess your suitability for the | Compliance with a legal obligation; to fulfil regulatory checks |

| The data or type of data we process | The purpose of processing that data | The lawful bases for processing this data |
|---|---|---|
| | role you have applied for | |
| Salary, benefits and bonus information | For the purposes of making an offer of employment | To perform an employment contract with you, in the event you are successful |
| We may also collect data about 'special categories' of sensitive personal information such as your race or ethnicity, religious beliefs, disability, sexual orientation | For equal opportunities monitoring | Where you have given us consent |
| If we need to make reasonable adjustments as part of the recruitment process | For the purposes of ensuring a fair selection process | Where you have given us consent |

Where we have obtained consent to use applicant data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

WHEN DO WE SHARE JOB APPLICANT DATA?

When it is legally necessary, or allowed under data protection law, we may need to share information about you with the organisations listed in the table below, for the listed reasons.

| Organisation Name | The Reason for Sharing |
|--|--|
| Oxford International Education and Travel Ltd | For our central HR team to manage job applicant data on behalf of Kent International College Limited Ltd |
| Regulatory bodies, such as Ofsted or the British Council | To comply with regulatory inspections |
| Service providers | For running surveys |
| Financial organisations | For processing payments |
| Our auditors | For carrying out legal audits of company accounts |
| Professional advisers and consultants | To assist us in developing our business |
| Police forces, courts, tribunals | For dealing with legal issues |

In addition, your personal data may be shared internally with other employees who are involved in the recruitment process, employees in HR who have responsibility for recruitment and on-boarding, employees in IT for setting up systems and permissions, and employees in security for access to our premises.

TRANSFERRING JOB APPLICANT DATA INTERNATIONALLY

Your personal information may be stored and processed outside of the country where it is collected, including outside of the European Economic Area.

We will only transfer personal data to a country or territory outside the European Economic Area:

- where the transfer is to a place that is regarded by the European Commission as providing adequate protection for your Personal Information; or
- where we have put in place appropriate safeguards to ensure that your Personal Information is protected (for example where both parties involved in the transfer have signed standard data protection clauses adopted by the European Commission); or
- the above does not apply but we are still legally permitted to do so, for example if the transfer is necessary for the establishment, exercise or defence of legal claims.

You can request further detail about the safeguards that we have in place in respect of transfers of Personal Information outside of the EEA and where applicable a copy of the standard data protection clauses that we have in place, by contacting us at protectingdata@oxfordinternational.com

STORING JOB APPLICANT DATA

We will keep personal information about you while you are an active applicant. We create and maintain files for each applicant. The information contained in these files is kept secure and is only used for purposes directly relevant to your position as an applicant. Once the application process is finished, we will retain this file if your application is successful in accordance with our Staff Privacy Notice, or delete it after 12 months, in accordance with our Data Retention Policy.

PRIVACY NOTICE FOR EMPLOYEES

This privacy notice explains how we collect, store and use personal data about employees. Kent International College Limited t/as University of Kent International College (UKIC) is the 'data controller' for the purposes of data protection law.

The table below shows the data that we process about employee and agencies, the reasons for processing this data and the lawful bases for processing this data.

| The data or type of data we process | The purpose of processing that data | The lawful bases for processing this data |
|---|--|--|
| Name, date of birth, gender | To administer our relationship with you | Fulfilment of a contract with you |
| Telephone number, email address, postal address | To administer our relationship with you | Necessary for our legitimate interests (to manage the workforce) |
| Next of kin and emergency contact numbers | To contact family or close friends in the event of an emergency | To protect your vital interests |
| Bank account details, payroll records, National Insurance number, tax status information, salary, annual leave, pension & benefits information, marital status | To process salary payments | Fulfilment of a contract with you |
| | To provide tax and related data to HMRC | Compliance with a legal obligation |
| Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process | To administer the business | Necessary for our legitimate interests (recruitment) |
| | To facilitate safe recruitment, as part of our safeguarding obligations towards pupils | Compliance with a legal obligation |

| The data or type of data we process | The purpose of processing that data | The lawful bases for processing this data |
|---|--|--|
| Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships | To administer our business | Necessary for our legitimate interests (to manage the workforce) |
| Performance information; outcomes of any disciplinary and/or grievance procedures; absence data | To administer our business | <p>Fulfilment of a contract with you</p> <p>Necessary for our legitimate interests (to support effective performance management)</p> |
| Copy of driving licence | To ensure legal, insured use of vehicles | Compliance with a legal obligation |
| Images | For maintaining security | Compliance with a legal obligation |
| | For marketing our services | <p>Where you have given us consent</p> <p>Necessary for our legitimate interests (to promote our educational</p> |

| The data or type of data we process | The purpose of processing that data | The lawful bases for processing this data |
|--|--|--|
| | | services and schools) |
| CCTV footage | For security management | Necessary for our legitimate interest (maintaining the security of the building) |
| Data about your use of the organisation's information and communications systems, including Internet use | To meet our safeguarding obligations | Compliance with a legal obligation |
| | To administer and protect the business | Necessary for our legitimate interests (to secure our buildings) |
| Criminal record information | To meet our safeguarding obligations | Compliance with a legal obligation |
| Medical and disability information | To administer our relationship with you (in relation to sick pay, occupational health, making reasonable adjustments and complying with H&S law) | Fulfilment of a contract with you Compliance with a legal obligation |

Where we have obtained consent to use employee data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

WHEN DO WE SHARE EMPLOYEE DATA?

When it is legally necessary, or allowed under data protection law, we may need to share information about you with the organisations listed in the table below, for the listed reasons.

| Organisation Name | The Reason for Sharing |
|--|---|
| The Department for Education | To meet our obligations for sharing data with the government |
| The Local Education Authority | To meet our obligations for sharing data with the government |
| Government departments | To meet our legal obligations on matters such as tax and social security |
| Regulatory bodies, such as Ofsted or the British Council | To comply with regulatory inspections |
| Service providers | Such as companies that run surveys for us or provide travel or insurance services or venues that are hosting events for University of Kent International College (UKIC) including seasonal programmes or conduct criminal record checks |
| Financial organisations | For processing payments, administering pensions |
| Our auditors | For carrying out legal audits of company accounts |

| Organisation Name | The Reason for Sharing |
|----------------------------------|--|
| Police forces, courts, tribunals | For dealing with legal issues |
| Other education providers | Where we have partnerships |
| Security providers | For DBS checking services |
| Other employers | To provide an employment reference on your behalf and where you have given your consent to the prospective employer to contact University of Kent International College. |

Changes to our Privacy Policy

We may update our Privacy Policy from time to time and we advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page which will become effective immediately.

Contact us

If you have any questions, concerns or would like more information about anything mentioned in our privacy notices, please contact our Data Compliance Manager at protectingdata@oxfordinternational.com,

Our Data Protection Officer can be contacted at dposupport@bulletproof.co.uk.