

University for the Creative Arts – Application Declaration

Data Protection Privacy Notice

The University for the Creative Arts takes its obligations with regard to data protection seriously. As such, we are providing this notice (“Privacy Notice”) to you so that you have information about how we collect and use your Personal Data (as defined below) in accordance with applicable data protection law, including, the General Data Protection Regulation 2016/679 (“GDPR”). Please read this Privacy Notice, as it contains important information of which you should be aware.

For the purposes of this Privacy Notice, “UCA Applicant” (“you” or “your”) means an individual who submits an application for a place as a student at the University for the Creative Arts (either directly to the University for the Creative Arts or via the University and Colleges Admission Service (UCAS)) (and “UCA Applicants” and “UCA” (“we”, “us” or “our”) means the University for the Creative Arts.

UCA is the data controller with regard to the processing of your Personal Data. The data controller is the entity that determines how and why Personal Data is processed.

This Privacy Notice does not form part of any other contract with us to provide goods or services to you.

This policy applies only to Personal Data processed by or on behalf of UCA. Where our website contains links to other sites, we have no influence on whether or not they comply with data protection law. You should check their own privacy policies before providing them with personal information.

1. What do we collect and process?

In order for UCA to accept and review your application to us, it is necessary for us to process Personal Data about you.

The term “*process*” means any action taken, with or without the help of electronic means, in connection with Personal Data, including collection, handling, use, transfer and disclosure by transmission, dissemination or otherwise making available, as well as recording, organisation, storage, retention, adaptation or alteration, access, retrieval, consultation, alignment or combination, blocking, anonymising, erasure, disposal or destruction.

“Personal Data” is information which (either on its own or in combination with other information UCA holds) allows UCA to identify, and manage our relationship with, a UCA Applicant and is collected when you submit an application to UCA via our website, www.uca.ac.uk, by telephone, via a paper application form, or apply via the University and Colleges Admissions Service (UCAS).

The Personal Data which we process may include the following:

- Name and (home and/or contact) address
- Contact information (including telephone number and email address)
- Title
- Age and date of birth
- Gender
- Place of birth, nationality, area of residence (including information about your and your family’s residence in the UK, EU, EEA and/or Switzerland)
- Citizenship status
- Passport and visa details
- Application username and password (for direct applications)
- Unique Learner Number (ULN)
- English language ability details and details of English language qualifications
- Test of English as a Foreign Language (TOEFL) Number
- International English Language Testing System (IELTS) TRF Number
- Financial information, including information about how you intend to fund your studies and whether or not you are applying for student finance
- Actual or suspected criminal offence or conviction information
- Name and contact details of parents, proxies or advisers
- Information about your health and/or disabilities

- Racial or ethnic origin
- Religious or philosophical beliefs
- Data concerning your sex life or sexual orientation
- Status as a Looked After Child or Care Leaver
- Your activities in preparation for higher education
- Details of parents' education and occupations
- Details of parents'/guardians/partners income
- Names of universities and/or institutes of higher education to which you have applied and courses and campus for which you have applied
- Details of your education and academic results
- Employment details
- Your personal statement and, if relevant, you portfolio
- Names, job titles, employers and contact details of your referee(s) and references/reports from educational establishments you have attended
- Bank account, payment card details and billing address
- Personal Data provided voluntarily by you
- the Personal Data contained in any other communication you make, or authorise to make, with us, or which is made on your behalf

Personal Data will primarily be collected from you directly or via UCAS. However, some Personal Data may, where lawful to do so, be collected by UCA from third parties (including your referee(s), government agencies, your previous educational establishment(s), Student Finance, an agent you appoint or publically available information about you (e.g. social networking sites). We will only accept and use information about you from reputable organisations who have either obtained your permission to share your information with us or who have collated information about you from publicly available sources.

Please note that you are under no obligation to provide UCA with your Personal Data. However, not providing some of the Personal Data described above could prevent UCA from performing its obligations in relation to your application to us and any related services received from us.

2. Why and for what purpose do we process your Personal Data and what is our lawful basis for doing so?

Please note: this list below may be updated from time to time and we will provide notice as and when such updates are made.

Personal Information	Basis of Processing	Purposes of Processing
<ul style="list-style-type: none"> • Name and (home and/or contact) address • Title • Contact information (including telephone number and email address) • Bank account, payment card details and billing address • Age and date of birth • Gender • Application username and password (for direct applications) • Unique Learner Number (ULN) • English language ability details and details of English language qualifications • Test of English as a Foreign Language (TOEFL) Number • International English Language Testing System (IELTS) TRF Number 	<p>Processing that is necessary to perform a contract or when taking steps in connection with a contract with you.</p>	<ul style="list-style-type: none"> (a) to help us identify you (b) to process your application to us (c) to assess your suitability for a place at UCA and make a decision about offering you a place (d) to process your application payment(s) to us

<ul style="list-style-type: none"> • Financial information, including information about how you intend to fund your studies and whether or not you are applying for student finance • Your activities in preparation for higher education • Personal Data contained in any other communication you make, or authorise to make, with us, or which is made on your behalf • Names of universities and/or institutes of higher education to which you have applied and courses and campus for which you have applied • Details of your education and academic results • Employment details • Name and contact details of parents, proxies or advisers • Your personal statement and, if relevant, you portfolio • Contact details of your referee(s) and references/reports from your referee(s) or educational establishments you have attended 		
<ul style="list-style-type: none"> • Name and (home and/or contact) address • Title • Contact information (including telephone number and email address) • Information about your health and/or disabilities • Personal Data provided voluntarily by you • Details of parents'/guardians/partners income 	<p>Where necessary, processing based on your freely given, specific, informed and unambiguous consent</p>	<ul style="list-style-type: none"> (a) to help us identify you (b) to deal with any additional queries or needs you may have (including necessary accommodations for health-related issues) (c) in an emergency (e.g. serious injury or illness) (d) to administer student loans/funding (e) [to send marketing information and surveys to you by email, post and text] (f) [to keep you updated on UCA courses and services which may be of interest or relevance to you] (g) [to use your Personal Data for our own marketing activities] (h) to administer bursary, scholarship and/or hardship funding

		(i) provision of health, disability and well-being services
<ul style="list-style-type: none"> • Name and (home and/or contact) address • Title • Contact information (including telephone number and email address) • Place of birth, nationality, area of residence (including information about your and your family's residence in the UK, EU, EEA and/or Switzerland) • Information about your health and/or disabilities • Citizenship status • Passport and visa details • Actual or suspected criminal offence or conviction information 	Processing that is necessary to comply with a legal obligation to which we as the data controller are subject (other than a contractual obligation)	<ul style="list-style-type: none"> (a) to help us identify you (b) to carry out checks to establish eligibility to receive educational services and financial support (c) to establish residency, eligibility for services and/or visa status (d) to comply with mandatory tax reporting to HMRC (e) upon lawful request by government authorities, law enforcement and regulatory authorities (f) to comply with applicable laws relating to health and safety (g) to comply with any other applicable laws
<ul style="list-style-type: none"> • Name and (home and/or contact) address • Contact information (including telephone number and email address) • Bank account, payment card details and billing address • Title • Age and date of birth • Gender • Unique Learner Number (ULN) • English language ability details and details of English language qualifications • Test of English as a Foreign Language (TOEFL) Number • International English Language Testing System (IELTS) TRF Number • Financial information, including information about how you intend to fund your studies and whether or not you are applying for student finance • Your activities in preparation for higher education • Personal Data contained in any other communication you make, or authorise to make, 	Necessary for the performance of a task carried out in the public interest	<ul style="list-style-type: none"> (a) to help us identify you (b) For the promotion and advancement of higher education (c) for equal opportunity monitoring (d) to protect the rights, property or safety of UCA, its employees, agents and/or others (e) for the prevention and detection of crime

<p>with us, or which is made on your behalf</p> <ul style="list-style-type: none"> • Names of universities and/or institutes of higher education to which you have applied and courses and campus for which you have applied • Details of your education and academic results • Employment details • Your personal statement and, if relevant, you portfolio • Contact details of your referee(s) and references/reports from educational establishments you have attended • Racial or ethnic origin • Religious or philosophical beliefs • Data concerning your sex life or sexual orientation • Actual or suspected criminal offence or conviction information • Status as a Looked After Child or Care Leaver 		
--	--	--

Personal Data – Legitimate Interests

Personal Information	Basis of Processing	Purpose of Processing	Balancing Test
<ul style="list-style-type: none"> • Name and (home and/or contact) address • Title • Contact information (including telephone number and email address) • Bank account, payment card details and billing address • Age and date of birth • Gender • Name and contact details of parents, proxies or advisers • Details of parents' education and occupations • Your feedback and survey responses • Personal Data provided voluntarily by you • the Personal Data contained in any other 	<p>Processing that is necessary for our own legitimate interests or those of third parties provided these are not overridden by your interests and fundamental rights and freedoms</p>	<ul style="list-style-type: none"> (a) to help us identify you (b) to respond to and/or deal with requests, enquiries or complaints (c) for managing our business (d) for marketing purposes (e) in response to legal process (f) to enforce UCA's agreements and policies (g) for statistical purposes (h) for improving and changing our services and processes (i) to convert your Personal Data into statistical or aggregated data in such a way as to ensure that you are not identified or 	<p>In respect of purposes (a), (b), (c) and (h), the specific legitimate interest pursued is the efficient, cost-efficient and profitable management of our business.</p> <p>In respect of purposes (a), (d), (g) and (i), the specific legitimate interest pursued is the analysis, monitoring, development, marketing and promotion of our services.</p> <p>In respect of purposes (a), (e) and (f), the specific legitimate interest pursued is for the protection and enforcement of our legal</p>

<p>communication you make, or authorise to make, with us, or which is made on your behalf</p> <ul style="list-style-type: none"> • Unique Learner Number (ULN) • English language ability details and details of English language qualifications • Test of English as a Foreign Language (TOEFL) Number • International English Language Testing System (IELTS) TRF Number • Financial information, including information about how you intend to fund your studies and whether or not you are applying for student finance • Your activities in preparation for higher education • Names of universities and/or institutes of higher education to which you have applied and courses and campus for which you have applied • Details of your education and academic results • Employment details • Your personal statement and, if relevant, you portfolio • Contact details of your referee(s) and references/reports from educational establishments you have attended 		<p>identifiable from that data. We may use this aggregated data to conduct research and analysis, including to produce statistical research and reports. We may share such anonymous aggregated data with third parties. Aggregated and anonymous information does not personally identify you and is therefore not Personal Data.</p>	<p>rights and the defence of legal claims.</p> <p>We have conducted a balancing test in relation to these interests, and have determined that our interests are legitimate for, and proportionate to, the purposes used and aims pursued and are not overridden by your interests or fundamental rights and freedoms to the privacy of your Personal Data and to not have such information processed by us.</p>
--	--	--	---

Special Categories of Personal Data

In addition to the bases of processing and purposes of processing set out above, in respect of special categories of personal data, we have the additional bases and purposes of processing:

Personal Information	Basis of Processing	Purposes of Processing
----------------------	---------------------	------------------------

<ul style="list-style-type: none"> • Name and (home and/or contact) address • Title • Racial or ethnic origin • Religious or philosophical beliefs • Data concerning your sex life or sexual orientation • Actual or suspected criminal offence or conviction information • Information about your health and/or disabilities 	Processing is necessary for reasons of substantial public interest	<ul style="list-style-type: none"> (a) for equal opportunity monitoring (b) for compliance with law relating to criminal offences or convictions (c) to comply with applicable law relating to health and safety (d) to protect the rights, property and safety of UCA, its employees, students, agents and/or others
<ul style="list-style-type: none"> • Name and (home and/or contact) address • Title • Information about your health and/or disabilities 	Your explicit consent	<ul style="list-style-type: none"> (a) to help us identify you (b) to deal with any queries or needs you may have (including necessary accommodations for health-related issues) (c) in a medical emergency (d) in the case of serious concern for, or immediate risk to, the health, well-being or safety of you or another individual (e) to determine your suitability for a place on certain courses

We cannot administer our relationship with you without your personal data. Where we don't need your personal data, we will make this clear, for instance we will explain if any data fields on our application are optional and can be left blank.

3. To whom will your Personal Data be disclosed?

Personal Data may be shared and transferred from us to:

- (a) UCAS;
- (b) the Student Loans Company;
- (c) Local Authorities;
- (d) Funding Agencies
- (e) the Home Office;
- (f) your referees and/or previous institution;
- (g) your proxy;
- (h) internal and external auditors;
- (i) government agencies;
- (j) other universities or institutes of higher education [in the United Kingdom] [to which you have applied]; and/or
- (k) third parties that are performing services under contract for UCA, such as professional advisers, international admissions agents, market survey companies, fulfilment companies, SMS text message suppliers, IT hosting agencies, form management providers and Customer Relationship Management (CRM) suppliers.

for the purposes noted above, or for such other purposes as are notified by UCA to you from time to time.

Where any third party processes your personal data on our behalf (as our processor), we will make sure that they have appropriate security standards in place to make sure your Personal Data is protected and we will enter into a written contract imposing appropriate security standards on them.

Parents, family members and guardians are considered to be third parties and your personal data will not be disclosed to them unless consent is received from you or it is otherwise lawfully justified to make such a disclosure under GDPR and in accordance with the University's Data Protection Policy and Procedures.

If any disclosures of personal data made by UCA require your personal data to be transferred outside the European Economic Area, we will only make that transfer if:

- (a) the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
- (b) we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;
- (c) the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
- (d) you explicitly consent to the transfer.

Please note that we may transfer your data outside the EEA in limited circumstances where our employees operate, or visit, countries outside the EEA for recruitment purposes.

4. Security of your Personal Data

As stated above, UCA takes the protection of your Personal Data seriously and we have implemented technical, physical and organisational measures to ensure the Personal Data of UCA Applicants is kept accurate, up to date and protected against unauthorised or accidental destruction, alteration or disclosure, accidental loss, unauthorised access, misuse, unlawful processing and/or damage.

5. Data Retention

UCA will retain your Personal Data only for such period as is necessary to perform the purpose(s) for which it was collected. In many cases this means that Personal Data will be retained for the duration of the time that we are dealing with your application or communicating with you, and then for a reasonable time thereafter in order to manage any queries or issues you may have about your application and to manage our relationship with you, defend any claims, and/or for any other record keeping purposes. This period is typically a period of not less than two years from the date of your initial application. If you are accepted at UCA and/or take up a place at UCA, different retention periods apply and these are set out in our student privacy policy which will be provided to you.

6. Your Rights

You can withdraw your consent or object to receiving marketing at any time by contacting us using any of the contact details provided below.

We offer the following rights to you in respect of your Personal Data:

1. You can request access to, or copies of, the Personal Data that we hold about you. If you would like to exercise this right, please contact us using any of the contact details given below.
2. If you believe that any information we have about you is incorrect or incomplete, please contact us using any of the contact details given below as soon as possible. We will take steps to seek to correct or update any information if we are satisfied that the information we hold is inaccurate;
3. You can request that your Personal Data be deleted, where it is no longer necessary for the purposes for which it is being processed and provided there is no other lawful basis for which we may continue to process such information;

4. If we are processing your Personal Data to meet our legitimate interests or in the performance of a task carried out in the public interest, you can object to the processing of your personal information by us. If we are unable to demonstrate our legitimate grounds for that processing, we will no longer process your personal information for those purposes;
5. You can withdraw any consent given to processing (this will not affect the lawfulness of processing based on consent before its withdrawal); or
6. [You have an additional right of data portability where the Personal Data we use is processed automatically based on your consent or for the purposes of performing our contract with you. You can ask us to provide your Personal Data in a structured, commonly used and machine-readable format to you or to a third party, as instructed by you.]
7. You can request that we restrict the processing of your Personal Data in certain circumstances when required by law; and
8. In certain circumstances, you have the right to object to our processing of your personal data where the processing is for the purposes of automated decision-making, including profiling.

If you would like to exercise any of your rights as described above (or if you have any questions about this Privacy Notice or concerns about our dealings with your Personal Data), please contact our Data Protection Officer at:

Telephone Number: 01252 892603
Email address: dpo@uca.ac.uk
Address: University for the
Creative Arts
Falkner Road
Farnham
Surrey
GU9 7HB

We will try to resolve any concerns you may have. However, if you consider that we are in breach of our obligations under data protection laws, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence or place of work. In the U.K., you may lodge a complaint with the Information Commissioner's Office (<https://ico.org.uk/global/contact-us/>).

7. Updates to this Privacy Notice

UCA may change this Privacy Notice from time to time in order to reflect changes in the law and/or its privacy practices. When this happens and where UCA is required to do so by law, it will provide you with a new and/or updated Privacy Notice detailing how the use of your Personal Data is changing and, if necessary, obtaining your consent for the further Processing, as may be applicable.

Policy last updated: 11 January 2019