

RICHMOND, THE AMERICAN INTERNATIONAL UNIVERSITY IN LONDON, INC

STUDENT PRIVACY POLICY



1. What is the purpose of this document?

Richmond, The American International University in London, Inc. ("the University") is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you, in accordance with the Data Protection Action 1998 the General Data Protection Regulation 2018 (GDPR).

This Student Privacy Policy sets out the basis on which Richmond the American International University in London Inc. ("we / us", "the University" or "Richmond") processes and shares students' personal data. Please read this policy carefully (in particular in relation to Richmond's use of Sensitive Personal Data.

The University is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to all those who enquire, apply to study enrol at and graduate from the University. It is important that you read this notice, together with other policies that we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

2. Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

3. How we collect data about you

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

1. the information that you provide to us when you interact with us before joining, for example when you express your interest in studying at the University;

2. when you apply to study at Richmond and complete an application through the Universities and Colleges Admissions Service (UCAS), the University's On-Line Direct Application, The Common Application and through third party educational counselling services or university partnerships;
3. from third parties, for example from your previous or current school, sixth form college, secondary school, university or employers who may provide a reference about you or who may sponsor your studies;
4. through marketing and recruitment campaigns;
5. through educational counselling services and local education representatives from whom you have sought support in applying to study at Richmond
6. through third party website on which you expressed an interest in studying at Richmond;
7. when you communicate with us by telephone, email or via our website, for example in order to make enquiries or raise concerns;
8. in various other ways as you interact with us during your time as a student and after you from the University, for the various purposes set out below;

4. The type of information we collect

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

1. Your name, your home address, correspondence address, term-time address, email address and telephone number, your date of birth (application), your passport number, your social security number, national insurance number, national identity card or UK immigration Biometric Residence Permit (BRP) details if applicable, your country of domicile, your nationality your ethnic origin and sexual orientation;
2. We may seek the names of the name and contact details of your next of kin
3. information relating to your education and employment history, the school(s), sixth form college(s)- secondary school(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study, your examination results with your predicted and actual examination grades;
4. information about your personal circumstances, and both academic and extracurricular interests, where this is relevant to the assessment of your suitability to receive a scholarship;
5. sensitive personal data and information about criminal convictions and offences if you disclosed this information;
6. sensitive information concerning your health, medical conditions, disability and dietary needs if you chose to disclose this information;
7. sensitive information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation if you chose to disclose this information;
8. We may require you to provide your bank details for the purpose of fee payment;
9. We may require you to provide a photograph for your University ID Card
10. We may request to participate in promoting the University which may including featuring in photographs, videos, testimonials, marketing material copy. If we do we will see your consent and require you to complete a Release Form.
11. When you graduate from Richmond we may ask you for the following information: (You can choose whether or not to provide this information)
 - a. Where you are or will be working or studying
 - b. Your new address and contact details
 - c. Your experience, future plans, decisions and achievements

12. We may also collect information about you after you leave Richmond for the Destination of Leaver from Higher Education survey (DLHE) or other surveys if we are required to do so by Higher Education Statistics Agency (HESA) and/or the Officer for Students or other agencies;
13. We may also collect information about you from publically available sources (for example, news reports about our alumni). We will seek your permission before using this information;
14. We may collect and retain details of any donations you have given us.

5. Your Consent

1. When you express an interest in studying at Richmond, the American International University in London (Richmond), you enquire and/or apply directly for a programme of study, we will request that you give your consent to process and retain your personal your data for legitimate processing. We will provide you with an opportunity to opt in (Give your Consent), and indicate your communications preferences about the type of communications that you wish to receive from Richmond by selecting those of interest to you.
2. If you applied through third party such as UCAS, or the Common Application or other third party, we will inform you that we have received the data that you supplied in your application and we will inform you that your data will be processed for the legitimate purpose intended.
3. When you accept the Terms and Conditions of Your Study Offer, you will be required to confirm that you provide your further consent to process and retain your data while you are enrolled at Richmond.

6. How we will use information about you

We will only use your personal information when the law allows us to. we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

7. How we use your personal data

We may process your personal data because it is necessary for the performance of a function or a contract with you or in order to take steps at your request prior to entering into a contract when you express an interest in studying at Richmond, when you apply to study at Richmond, when you enrol and graduate from Richmond. In this respect, we use your personal data for the following:

1. to send you information about the University and its academic provision and services;
2. To answer your enquiries about the University and its academic provision and services;

3. To invite you to interviews, open days, applicant days, and webinars;
4. interact with you as part of the admissions process;
5. to send you correspondence relating to your academic study offer and acceptance at Richmond
6. assessing eligibility for bursaries and scholarships;
7. to provide you with information about ancillary services such as accommodation or other university services
8. to deal with your concerns or feedback you may have during the admissions process;
9. to market the University, our academic programmes and our services in marketing campaigns which may include emails, SMS or telephone calls
10. to meet statutory and legal obligations which may include compliance with immigration legislation and regulations, compliance with regulators including student funding agencies, the prevention and detection of fraud and assistance in criminal investigation when requested by civic authorities such as the police
11. to manage academic matters relating to your programme of study, including the provision of our core teaching, learning and research services (e.g. registration, assessment, attendance, monitoring academic progress, academic misconduct investigations, certification, graduation);
12. to maintain student records;
13. to correspond with you in connection during your enrolment and after you have graduated from Richmond;
14. to provide library, IT and information services;
15. to provide non-academic matters in support of our core services, including student support services such as support with disability, providing additional learning support, careers and employability advice, counselling services , personal supervisors and academic departments);
16. monitoring and promoting equality of opportunities;
17. safeguarding and promoting the welfare of our students;
18. ensuring students' safety and security;
19. managing student accommodation and catering services;
20. managing car parking on campus;
21. administering finance (e.g. payment-collection of tuition and other fees, charges and fines, applying scholarships and bursaries to your tuition plan account);
22. undertaking audits (e.g. to ensure compliance with our regulatory and legal obligations);
23. providing operational information (e.g. providing IT support, information about building closures or access restrictions on campus, or safety advice);
24. promoting our services (e.g. providing information about summer schools, student exchanges, or other events happening on and off campus);
25. handling with grievances and disciplinary actions;
26. handling with complaints and enquiries;
27. To compile assessment, graduation and degree information for the conferment of degree award and degree certificates;
28. keeping in touch with our alumni for the purposes of delivering exclusive alumni services, fundraising and promoting closer links between Richmond and its former students (We will seek your permission to do so);
29. other administrative purposes, including: carrying out research and statistical analysis;

8. Sensitive Information

Some of your personal data processed by us may be classified as "sensitive" under the DPA and GRPR. This includes your racial or ethnic origin, any disabilities and any associated medical conditions that you have chosen to declare to us. It also includes any criminal convictions you may hold either before or during the time you are registered as a student at Richmond, and the commission or alleged commission by you of any offences during the time you are registered as a student at Richmond.

We may also collect sensitive information from you in relation to any applications you submit for extenuating circumstances, complaints, disciplinary cases and optional student services provided by Richmond. Sensitive personal information about you may also be provided to us in some circumstances by others (for example, other students or members of staff who may be concerned about you).

If you disclose sensitive personal information to us, we will only use that information for the purpose(s) for which the information was collected. We will collect and use your sensitive personal information either with your consent (this will be made clear when it is collected, through a specific request for consent) or without your consent where there is a legal basis to do so (such as for equal opportunities monitoring).

We will

1. use information you provide to us relating to a medical condition, disability or learning support need you may have for the purposes of evaluating what suitable support may be available to you and to share this information with Richmond employees and third parties who are directly involved in the application process or the provision of student services, for example RIASA and AIFS. Please note that this information has no bearing on the academic assessment of your application;
2. use information relating to any criminal conviction you may have for the purposes of evaluating your admission to Richmond or for evaluating whether to allow you to continue to study at Richmond and to share this information with Richmond employees and third parties for such purposes;
3. Share your sensitive personal data with other third parties without your consent if we have a legal basis to do so. This includes the provision of sensitive personal data, including your ethnicity and any disabilities you have declared, to Higher Education Statistics Agency (HESA) and/or the Office of Student (as specified below item 9.15): consent is not required for this under the DPA because it is collected for purposes of statutory equal opportunities monitoring and is not used to make decisions about you;

Other disclosures of sensitive personal data without your consent will be rare and include circumstances where it is vital to protect the interests of you or others (i.e. where you or another person is perceived to be at significant risk), it is necessary for the prevention of fraud or if we are under a legal obligation

9. Data sharing

We may have to share your data with third parties, including third-party service providers and other entities.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. "Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group and include:

1. University administrative, professional and academic employees;
2. third parties such as the Universities and Colleges Admissions Service (UCAS), The Common Application (USA) and Campus Management Corp Ltd (Customer Relationships Management System provider) and other contractors as appointed from time to time;
3. Educational counselling services (appointed UK, EU, EEA and overseas; representatives/agents with whom and through whom you may have applied to study at Richmond);
4. University partners with whom you currently study or with whom you intend to study after completion of a Richmond programme;
5. We may also disclose your personal data to collaborating organisations that provide teaching, assessment or student services in partnership with Richmond for the programme you have expressed an interest in. This could include Richmond International Academic and Soccer Academy ("RIASA" and "IASA") and the American Institute for Foreign Study ("AIFS");
6. where applicable, another educational provider so they can contact you to offer a pre-sessional or preparatory course relevant to your application to study at Richmond;
7. parents, guardians, and next-of-kin where you have given your consent or where there is a legitimate reason for concern and disclosure;
8. Marketing Agencies with whom we may share limited data such for marketing campaigns;
9. Internal and external auditors carrying out either statutory compliance or data integrity audit functions;
10. and contractors where there is a legitimate reason for their receiving the information which may include the following:
 - a. third parties who work with us to provide student accommodation;
 - b. third parties who work with us to provide student support services (e.g. counselling);
 - c. third parties who are contracted to provide out-of-hours IT services for us;
 - d. organisations operating anti-plagiarism software on our behalf (such as Turnitin®);
 - e. organisations operating learning and teaching resource platforms (such as Blackboard®)
11. Student sponsors (e.g. the Student Loan Company, The US Department of Education (USA) for those in receipt of Title IV funding, The Department of Veterans Affairs (USA), Scholarship agencies and education loan providers. The University may provide the following details to your sponsors if required by law to do so:
 - a. Enrolments Confirmation

- b. Full Time/Part Time Study Status
 - c. Your academic progress
 - d. Withdrawal and/or study intermission Status
 - e. Your graduation date
 - f. When you fall below any required threshold for sponsorships eligibility
 - g. Your contact details when requested by the US Department of Education and the National Student Loan Database (NSLDS) as required by US Financial Aid including but not limited to Title IV regulation
12. Crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions and Trading Standards);
 13. Richmond's Student Government for the purposes of contacting you regarding the services it offers (e.g. support, membership of student societies, to buy tickets for events, vote in elections and for other Student Government matters);
 14. Professional bodies who accredit, validate or assure the quality of what we do (including The Open University, Middle States Commission on Higher Education, the UK Quality Assurance Agency, the Office of Students and relevant subject accreditation body including but not limited to The British Psychological Society (PBS) and Association of Chartered Certified Accountants (ACCA) in relation to the confirmation of qualifications, professional registration and conduct and the accreditation of courses;
 15. Each year, the university is required to submit data about its students to the Higher Education Statistics Agency (HESA). HESA is the official body responsible for collecting and disseminating information about higher education in the UK. Data will be sent to HESA including your name, date of birth, your studies and qualifications. This information will be used by HESA in compliance with the Data Protection Act 1998 and from 25th May 2018, with the General Data Protection Regulation (GDPR). More information about the student data collection return can be found here: <https://www.hesa.ac.uk/about/regulation/data-protection/notices> The University will request the consent of new students on admission, and for returning students;
 16. The United Kingdom Visa and Immigration Services(UKVI) for those applicants and students that require a UK Tier 4 student visa to study in the UK, or are subject to other immigration controls as defined by the UKVI;
 17. The market research company appointed to carry out the National Student Survey and other survey contractors appointed to carry out surveys of student finances. For more information about use of your information for the National Student Survey please see <http://www.thestudentsurvey.com/students.php> You have the right not to participate in the survey;

10. International data transfers

1. Some of the personal data that we process about you will be transferred to, and stored at, a destination outside the UK for example where it is processed by our staff operating outside the UK or where personal data is processed by our study abroad partners who are based outside the UK or who uses storage facilities outside the UK.
2. In these circumstances, your personal data will only be transferred on one of the following bases:

- a. 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);
- b. a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- c. There exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

11. How long your information is kept

Subject to any other notices that we may provide to you, we may retain your data for the purposes or marketing, recruitment and admissions, enrolment, assessment and graduation for the following periods

1. For current and future intended years of study for those who have expressed an interest in and enquired about studying at Richmond or have applied to study at Richmond
2. Richmond adheres the principle under the DPA and the GDPR that personal data of applicants and enrolled should is not kept longer than is necessary and legitimate
3. We take measures to ensure that your personal data is securely destroyed or erased from our systems when it is no longer required
4. Anonymised information may be retained indefinitely by us in order to maintain demographic information for statistical and marketing research purposes

12. Changes to your personal data

To enable us to comply with the DPA and the GDPR and keep accurate information about you, you agree to provide us with accurate and up to date information and to notify us of any changes to your contact details and circumstances including, but not limited to, any changes to your programme of study or if you intend to leave Richmond. Please contact us if you would like to update your data.

- a. If you are an enquirer (and you have not applied to study at Richmond) or applicant, you may update your details by contacting our Admissions Team at: admissions@richmond.ac.uk
- b. If you are an enrolled student you may update your details at any time by login to Self Service: <https://selfservice.richmond.ac.uk/SelfService/Account/AccountHome.aspx>
- c. If you are Richmond graduate, you may update your details by contacting our Alumni Officer at alumni@richmond.ac.uk

13. Access to your Data

To request access to the personal data that we hold about you, you may contact our Data Protection Office by email: DPO@richmond.ac.uk ; or by post at the following address:

Data Protection Officer
 Richmond, the American University in London,
 Queen Road,
 Richmond, Surrey TW10 6JP

14. Data Protection Compliance

If you have any questions about this privacy notice or how we handle your personal information, please contact DPO@richmond.ac.uk. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

15. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer at DPO@richmond.ac.uk . Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

16. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

17. Your rights

Under the Data Protection Act you have the following rights:

1. to obtain access to, and copies of, the personal data;
2. to require that we cease processing your personal data if the processing is causing you damage or distress;
3. Request us not to send you marketing email communications.

From the 25th of May 2018, you will also have the following additional rights:

1. require us to correct the personal data we hold about you if it is incorrect;
2. require us to delete your personal data from our records;
3. 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);
4. to receive from us the personal data we hold about you which you have provided to us, in a reasonable/portable format specified by you, including for the purpose of transmitting that personal data to another data controller;
5. 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.

Contact us

If you have any questions about this privacy notice, how we process your personal data, or to request access to the personal data that we hold about you, you can contact our Data Protection Officer by email: DPO@richmond.ac.uk or by post: Data Protection Officer, Richmond, the American University in London, Queen Road, Richmond, Surrey TW10 6JP.