

SelectStudies GDPR Privacy Notice - Students

Edition 1
May 2018



SelectStudies collects a lot of data and information about the students taking part in our programmes. This data is necessary for the provision of our programmes. This privacy notice explains how and why we collect students' data, what we do with it, and what rights students and their parents have.

Privacy Notice (How we use student information)

SelectStudies is a Private Limited Company, providing educational and cultural exchange programmes in the UK and Ireland. Our students come from all over the world, and have an age range of 13 to 19.

SelectStudies acts both as a Data Controller and a Data Processor for student data.

We act as a Data Processor with regards to Data received through our international partners prior to the arrival of our students.

We act as a Data Controller with regards to Data which we collect while our students are participating in our programmes.

Our Data Protection Officer is Bo Slot Larsen, Email: dpo@selectstudies.uk

Why do we collect and use student information?

We collect and use student information under the following lawful bases

- a. where it is necessary to fulfil our contractual obligations to the student or our partners (Article 6 (b));
- b. where we have the consent of the data subject (Article 6 (a));
- c. where it is necessary for compliance with a legal obligation (Article 6 (c));
- d. where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
- e. where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 (e)).

Where the personal data we collect about students is sensitive personal data, we will only process it where:

- a. it is necessary to fulfil our contractual obligations to the student or our partners
- b. we have explicit consent;
- c. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and / or
- d. processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Please see our Data Protection Policy for a definition of sensitive personal data.

The categories of student information that we collect, hold and share include:

- a. Personal information about students and their natural parents (NPs) (such as name, address, and other contact details)
- b. Characteristics (such as ethnicity, language, medical conditions, nationality, country of birth, and general information about the daily life of the student and NPs)

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- c. Attendance and Assessment information from students' schools in their home countries
- d. Sensitive information including students' medical records
- e. Pastoral information regarding students' well-being and daily life and activities throughout the programme
- f. Attendance and Assessment information from students' schools in the programme country

From time to time and in certain circumstances, we might also process personal data about students, some of which might be sensitive personal data, including information about criminal proceedings / convictions, information about sex life and sexual orientation, child protection / safeguarding. This information is not routinely collected about students and is only likely to be processed by SelectStudies in specific circumstances relating to particular students, for example, if a child protection issue arises or if a student is involved in a criminal matter. Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer and / or the Police. Such information will only be processed to the extent that it is lawful to do so and appropriate measures will be taken to keep the data secure.

We collect information about students when they apply to the programme and update it during their time on the programme as and when new information is acquired.

Collecting student information

Whilst the majority of student information you provide to us is mandatory, some of it is provided to us on a voluntary basis.

Where appropriate, we will ask students or their NPs for consent to process personal data where there is no other lawful basis for processing it, for example where we wish to use photos or images of pupils on our website or on social media to promote SelectStudies activities or if we want to ask your permission to use your information for marketing purposes. NPs / students may withdraw consent at any time.

Storing Student Data

We are obliged to keep certain data in order to trace historical events. In order to comply with this obligation, certain Student data will be stored indefinitely when a student has participated in our programme. All data will be stored safely on our secure server.

Personal data for students who have applied for the programme and cancelled without participating in the programme will be deleted after three years.

A significant amount of personal data is stored electronically, for example on our database or server. Some information is also stored in hard copy format.

Personal data (primarily pastoral information and attendance & assessment information) will be transferred to each student's home country.

Appropriate steps will be taken to keep data secure when transferring it to other countries.

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Who do we share student information with?

We routinely share student information with:

- Our LSCs and other support staff
- The schools/colleges which our students attend, or which we apply to on the behalf of our students
- The host family which a student is placed with, or host families which are considering hosting a student
- The local authority in each student's placement area
- Social Services / the local authority child protection team
- Our partners in each student's home country

From time to time we may also share student information with other third parties. In the event that we share personal data with third parties we will provide the minimum amount of personal information necessary to fulfill the purpose. We do not share information about our students with anyone without consent unless the law allows us to do so

Requesting access to your personal data

Under data protection legislation, students, and in some circumstances, NPs, have the right to request access to information about them that we hold ("Subject Access Request"). From the age of 13, we generally regard students as having the capacity to exercise their own rights in relation to their personal data. This means that where we consider a pupil to have sufficient maturity to understand their own rights, we will require a Subject Access Request to be made by the student and not their NP(s) on their behalf. This does not affect any separate statutory right parents might have to access information about their child.

Subject to the section below, the legal timescales for SelectStudies to respond to a Subject Access Request is one calendar month.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the our data protection responsibilities.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Contact:

If you would like to discuss anything in this privacy notice, please contact:
Bo Slot Larsen, Data Protection Officer, gdpr@selectstudies.com