



# VERITAS SCHOOL OF BUSINESS & TECHNOLOGY

## PRIVACY NOTICE

*For applicants, prospective, current and former students, alumni and website users*

| DOCUMENT CONTROL      |                                                                         |
|-----------------------|-------------------------------------------------------------------------|
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Registered in England and Wales | Company Registration No. 16467979

## Document status and external framework

This notice is intended for publication on the VSBT website after approval. It provides privacy information in a form designed to meet the transparency requirements of Articles 13 and 14 of the UK GDPR, as amended by the Data (Use and Access) Act 2025.

### Important governance note

A privacy notice must reflect what the organisation actually does. Before publication, the responsible owner must verify the systems, recipients, retention periods, contact routes and any international transfers described in this notice against VSBT's current records of processing activities, contracts and Records Retention Schedule.

The Office for Students does not prescribe a single institutional privacy-notice format. This notice supports OfS-facing governance and data-reporting arrangements by explaining how student information may be used and shared lawfully, transparently and securely.

## External referents

- [UK General Data Protection Regulation \(UK GDPR\)](#)
- [Data Protection Act 2018](#)
- [Data \(Use and Access\) Act 2025](#)
- [Privacy and Electronic Communications Regulations 2003 \(PECR\)](#)
- [ICO guidance: the right to be informed and privacy information](#)
- [Office for Students privacy information](#)
- [Jisc and HESA data protection and collection notices](#)
- [Student Loans Company privacy notice](#)

## Related VSBT documents

- Data Protection Policy and Records Retention Schedule
- Information Accuracy and Completeness Policy / Data Return Control Procedures
- Data, KPI and Reporting Policy
- Student Handbook and Terms and Conditions
- Complaints Policy and Procedure
- Safeguarding and Prevent Policy
- Sexual Harassment Policy and Protocols
- CCTV Notice, Cookie Notice and Staff Privacy Notice, where applicable

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## Privacy at a glance

### What you should know

**Controller:** Veritas School of Business & Technology (VSBT) is responsible for deciding how and why it uses personal data covered by this notice.

**Purpose:** We use personal data to manage enquiries, applications, enrolment, teaching, assessment, student support, funding, quality assurance, safeguarding, regulatory reporting and alumni engagement.

**No sale of data:** VSBT does not sell personal data.

**Your choices and rights:** You may have rights to access, correct, erase, restrict, move or object to the use of your data, and to withdraw consent where consent is the lawful basis.

**Contact:** Email [info@vsbt.co.uk](mailto:info@vsbt.co.uk) with “Data Protection” in the subject line, or write to the Data Protection Officer at VSBT’s registered address.

## 1. About this Privacy Notice

1.1 This Privacy Notice explains how Veritas School of Business & Technology (VSBT, “we”, “us”, “our” or “the College”) collects and uses personal data. It also explains the choices and rights available to individuals under UK data protection law.

1.2 It applies primarily to applicants, prospective students, current students, former students, alumni, website users, enquirers, visitors and other individuals whose information is processed in connection with VSBT’s educational activities. A separate Staff Privacy Notice should be used for employees, workers and job applicants.

1.3 This notice is part of a layered privacy framework. More specific information may be provided at the point of collection, for example on application forms, surveys, counselling or wellbeing forms, CCTV signage, event-registration forms, research consent materials, cookies and online services. The more specific notice should be read together with this document.

1.4 Where a student is under 18, VSBT may also process parent, guardian or emergency-contact information and may apply additional safeguarding measures. Information will be presented in language appropriate to the intended audience.

## 2. Who we are and how to contact us

2.1 The data controller is Veritas School of Business & Technology (VSBT), a company registered in England and Wales under company number 16467979.

| Contact point                                | Details                                                                                                                                                     |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Registered and correspondence address</b> | 11 Albion Place, Maidstone, Kent, England, ME14 5DY                                                                                                         |
| <b>Website</b>                               | <a href="http://www.vsbtc.co.uk">www.vsbtc.co.uk</a>                                                                                                        |
| <b>General email</b>                         | <a href="mailto:info@vsbt.co.uk">info@vsbt.co.uk</a>                                                                                                        |
| <b>Data protection contact</b>               | Data Protection Officer / Data Protection Lead. Email <a href="mailto:info@vsbt.co.uk">info@vsbt.co.uk</a> and place “Data Protection” in the subject line. |

2.2 Depending on the activity, VSBT may act as an independent controller, a joint controller with another organisation, or a processor acting on another controller’s documented instructions. Where arrangements are materially different, VSBT will provide additional privacy information.

## 3. Key terms

| Term                         | Meaning                                                                                                                                                                                                                              |
|------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Personal data</b>         | Information relating to an identified or identifiable living individual. It includes direct identifiers and information that can identify a person when combined with other data.                                                    |
| <b>Processing</b>            | Any operation involving personal data, including collecting, recording, organising, storing, changing, retrieving, consulting, sharing, analysing, restricting, deleting or destroying it.                                           |
| <b>Special category data</b> | More sensitive information about racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic or biometric data used for identification, health, sex life or sexual orientation. |
| <b>Criminal offence data</b> | Personal data relating to criminal convictions, alleged offences, proceedings, penalties or related security measures.                                                                                                               |
| <b>Controller</b>            | The organisation that determines the purposes and means of processing personal data.                                                                                                                                                 |
| <b>Processor</b>             | An organisation that processes personal data on behalf of a controller under a written contract.                                                                                                                                     |

## 4. Data protection principles

4.1 VSBT will process personal data in accordance with the data protection principles. Personal data will be:

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate purposes and not used incompatibly with those purposes;
- adequate, relevant and limited to what is necessary;
- accurate and, where necessary, kept up to date;
- kept in identifiable form for no longer than necessary;
- protected by appropriate technical and organisational security; and
- managed under arrangements that allow VSBT to demonstrate accountability.

4.2 VSBT applies privacy by design and by default when introducing new systems, services, partnerships or high-risk processing. Data protection impact assessments will be completed where the law requires them or where they are appropriate to manage risk.

## 5. The personal data we collect

5.1 The information collected depends on the relationship and service involved. It may include:

| Category                                    | Examples                                                                                                                                                                                     |
|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Identity and contact</b>                 | Name, title, date of birth, address, email, telephone number, student or applicant number, photograph, signature and emergency contacts.                                                     |
| <b>Admissions and eligibility</b>           | Application information, qualifications, references, personal statement, interview records, right-to-study or immigration evidence, identity checks and prior study.                         |
| <b>Academic and engagement</b>              | Programme, modules, timetable, attendance, VLE activity, assessments, feedback, marks, progression, awards, transcripts, placements and academic-integrity records.                          |
| <b>Financial and funding</b>                | Fees, invoices, payment records, sponsorship, bursaries, bank details where required, Student Finance information and evidence of funding eligibility.                                       |
| <b>Support, wellbeing and accessibility</b> | Disability, health, reasonable adjustments, counselling or welfare contacts, caring responsibilities, support plans and safeguarding information.                                            |
| <b>Equality and demographic</b>             | Age, sex, gender reassignment, ethnicity, nationality, religion or belief, disability, sexual orientation, socioeconomic and widening-participation indicators.                              |
| <b>Conduct and casework</b>                 | Complaints, appeals, discipline, fitness to study, mitigating circumstances, harassment or sexual misconduct reports and related evidence.                                                   |
| <b>Technology and security</b>              | Account identifiers, access logs, device and browser data, IP address, authentication records, network usage, service-desk tickets, CCTV, building-access records and cyber-security alerts. |
| <b>Communications and media</b>             | Emails, letters, call notes, survey responses, event registrations, photographs, audio or video recordings and marketing preferences.                                                        |
| <b>Graduate and alumni</b>                  | Award verification, graduation, destinations, employment or further study, alumni engagement and professional-development interests.                                                         |

5.2 We ask individuals not to provide unnecessary personal data about themselves or third parties. Where third-party information is necessary, the person providing it should ensure they are permitted to do so and, where appropriate, should direct the third party to this notice.

## 6. How we obtain personal data

6.1 We collect personal data directly from individuals when they make an enquiry, apply, enrol, attend teaching, use systems, submit work, request support, complete a survey, attend an event, make a payment, communicate with VSBT or use the website.

6.2 We may also obtain information from:

- schools, colleges, universities, awarding organisations, validating partners and previous education providers;
- referees, employers, placement providers, sponsors, agents and recruitment partners;

- Student Finance England, the Student Loans Company, the Department for Education and other funding bodies;
- the Office for Students, Jisc/HESA, UCAS or other admissions and sector-data services where used;
- professional, statutory and regulatory bodies, external examiners and auditors;
- public authorities, local authorities, the Home Office or UK Visas and Immigration where applicable;
- health, safeguarding, police or emergency services where lawful and necessary;
- VSBT learning platforms, attendance systems, library, assessment, plagiarism-detection, IT-security and access-control systems; and
- publicly available sources where the use is fair, lawful and relevant.

6.3 When personal data is obtained from another source, VSBT will provide privacy information within the timescales required by law unless an exemption applies.

## 7. Why we use personal data and our lawful bases

7.1 VSBT must identify a lawful basis before processing personal data. The basis depends on the purpose and circumstances. Consent is not used where the processing is necessary to provide the course, administer the student contract or meet a legal obligation.

| Purpose                                                                         | Typical lawful basis under Article 6 UK GDPR                                                                                                                                             |
|---------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Responding to enquiries and managing applications</b>                        | Steps at the individual's request before entering into a contract; legitimate interests in managing admissions and recruitment; legal obligation where checks are required by law.       |
| <b>Enrolment, teaching, assessment, progression and award administration</b>    | Performance of the student contract; legal obligation; legitimate interests in delivering and assuring education.                                                                        |
| <b>Attendance, engagement, academic support and early intervention</b>          | Performance of contract; legitimate interests in supporting success, quality and effective administration; legal obligation where funding or regulatory rules apply.                     |
| <b>Fees, funding, bursaries, sponsorship and debt management</b>                | Performance of contract; legal obligation; legitimate interests in financial administration and prevention of fraud.                                                                     |
| <b>Student support, safeguarding, health and safety and emergencies</b>         | Legal obligation; legitimate interests in protecting the College community; vital interests in emergencies.                                                                              |
| <b>Equality monitoring, access and participation and outcome analysis</b>       | Legal obligation or public task only where supported by law; legitimate interests in evaluating equality and student outcomes; additional Article 9 condition for special category data. |
| <b>Complaints, appeals, discipline, academic integrity and legal claims</b>     | Performance of contract; legal obligation; legitimate interests in fair case management, protecting standards and establishing or defending legal claims.                                |
| <b>Quality assurance, audit, regulatory and statutory reporting</b>             | Legal obligation; public task only where a task is laid down by law; legitimate interests in governance, accountability and quality assurance.                                           |
| <b>IT services, account security, CCTV, access control and fraud prevention</b> | Legitimate interests in security, safety, service continuity and preventing misuse; legal obligation where applicable.                                                                   |
| <b>Research, surveys and service improvement</b>                                | Consent where appropriate; legitimate interests; public task where lawfully available; legal obligation; research and statistical safeguards.                                            |
| <b>Marketing, events and alumni communications</b>                              | Consent where PECR requires it; legitimate interests for proportionate non-electronic communications or relationship management, subject to the right to object.                         |

7.2 Where VSBT relies on legitimate interests, it will identify the interest, assess necessity and balance that interest against the individual's rights and reasonable expectations. A copy of the relevant legitimate interests assessment may be requested where appropriate.

7.3 Where processing is based on consent, consent will be specific, informed and capable of being withdrawn. Withdrawal does not affect processing already carried out lawfully before withdrawal.

7.4 If VSBT intends to use personal data for a materially new and incompatible purpose, it will identify a lawful basis and provide further privacy information before the new use begins, unless the law permits otherwise.

## 8. Special category and criminal offence data

8.1 VSBT processes special category data only where it has both an Article 6 lawful basis and an Article 9 condition. Depending on the circumstances, the Article 9 condition may include explicit consent, vital interests, substantial public interest under the Data Protection Act 2018, health or social care, legal claims, or research and statistics with appropriate safeguards.

8.2 Examples include using disability and health information to provide reasonable adjustments and support; equality information to monitor access, participation and outcomes; and safeguarding information to protect individuals and the wider community.

8.3 Criminal offence data may be processed only where authorised by law, for example in connection with safeguarding, regulated activity, suitability checks, disclosures, disciplinary proceedings, fraud prevention or legal claims. VSBT will meet the applicable conditions in the Data Protection Act 2018 and maintain an appropriate policy document where required.

8.4 Access to sensitive information is restricted to staff and service providers who need it for authorised purposes. Additional security, confidentiality and retention controls will be applied.

## 9. Higher education regulation, funding and statutory reporting

9.1 VSBT may be required or permitted to provide personal data to organisations that regulate, fund, monitor or support higher education. This may include the Office for Students, Jisc/HESA, the Department for Education, the Student Loans Company, awarding organisations, validating partners and professional, statutory or regulatory bodies.

9.2 Information may be used for purposes including registration and regulatory monitoring, funding administration, student-number and outcome returns, equality analysis, National Student Survey administration, Graduate Outcomes, quality assurance, audit, fraud prevention and public-interest research or statistics.

9.3 Some recipients act as independent controllers and publish their own collection notices. Individuals should read the current OfS, Jisc/HESA and Student Loans Company privacy information linked in the External Referents section.

### Accuracy of regulatory data

VSBT expects students and applicants to provide accurate and complete information and to notify the College when relevant details change.

VSBT applies validation, reconciliation, approval and audit controls to data returns. Where inaccurate information is identified, it will be corrected and, where required, the receiving organisation will be notified.

## 10. Who we share personal data with

10.1 VSBT shares personal data only where there is a lawful purpose and the disclosure is necessary and proportionate. Depending on the activity, recipients may include:

| Recipient category                                             | Purpose / examples                                                                                                                                                                                                      |
|----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Awarding and education partners</b>                         | Awarding organisations, validating universities, collaborative partners, external examiners, progression or transfer providers and placement organisations.                                                             |
| <b>Regulators, funding and sector bodies</b>                   | OfS, Jisc/HESA, DfE, SLC, funding bodies, professional or statutory bodies and survey administrators.                                                                                                                   |
| <b>Service providers acting as processors</b>                  | Cloud hosting, Microsoft 365 or equivalent services, student-record systems, VLE, library, assessment, plagiarism detection, survey, communications, payment, identity-verification, security and IT support providers. |
| <b>Public and safeguarding authorities</b>                     | Police, courts, local authorities, emergency services, safeguarding bodies, UKVI/Home Office and other public authorities where disclosure is required or permitted by law.                                             |
| <b>Professional advisers and assurance providers</b>           | Auditors, insurers, legal advisers, consultants and accreditation or quality-review bodies.                                                                                                                             |
| <b>Employers and third parties requested by the individual</b> | References, award verification, placements or disclosures authorised by the individual or otherwise lawful.                                                                                                             |



| Recipient category                | Purpose / examples                                                                           |
|-----------------------------------|----------------------------------------------------------------------------------------------|
| OIA and dispute-resolution bodies | Information needed to respond to an external complaint, legal process or independent review. |

10.2 VSBT requires processors to act only on documented instructions, maintain confidentiality, implement appropriate security, assist with rights and breach management, and delete or return data at the end of the service. Independent controllers are responsible for their own compliance.

10.3 VSBT does not sell personal data. It will not disclose personal data to family members, sponsors or other third parties merely because they request it; a lawful basis or valid authority is required.

## 11. International transfers

11.1 Some technology, support or partnership arrangements may involve access to or storage of personal data outside the United Kingdom. VSBT will identify whether a restricted transfer takes place and will use a lawful transfer mechanism.

11.2 Appropriate mechanisms may include UK adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to approved EU Standard Contractual Clauses, or a specific legal exception. Where required, VSBT will complete the statutory data protection test and apply supplementary security measures.

11.3 Further information about the safeguards used for a particular transfer may be requested from the Data Protection Officer, subject to protection of confidential or security-sensitive information.

## 12. Automated decision-making, profiling, AI and learning analytics

12.1 VSBT may use analytics or automated tools to support administration, identify potential disengagement, improve services, detect security risks or prioritise staff review. Such tools must be used transparently, proportionately and with appropriate oversight.

12.2 VSBT will not make a solely automated decision that produces legal or similarly significant effects unless the decision is lawful and suitable safeguards are in place. Those safeguards may include meaningful human intervention, the opportunity to express a view, an explanation of the decision and a route to challenge it.

12.3 Where artificial intelligence is used to assist staff, VSBT remains responsible for the decision and for data protection compliance. Staff must verify outputs, minimise personal data, protect confidential information and avoid using unapproved public AI services for student records or sensitive casework.

12.4 If VSBT introduces significant automated decision-making or a high-risk learning-analytics activity, it will complete a data protection impact assessment and provide specific privacy information before implementation.

## 13. Website, cookies and electronic communications

13.1 When an individual uses the VSBT website or online services, VSBT may collect technical information such as IP address, device and browser information, pages visited, referral source and security logs. This supports security, accessibility, website operation and service improvement.

13.2 Strictly necessary cookies may be set without consent where permitted by law. Non-essential analytics, advertising or similar cookies will be used only in accordance with PECR and the Cookie Notice, including obtaining consent where required. Cookie preferences can be changed through the website's consent controls.

13.3 Direct marketing by email, text or similar electronic means will comply with PECR. Individuals can withdraw consent or object to direct marketing at any time by using the unsubscribe method or contacting VSBT. The right to object to direct marketing is absolute.

13.4 Messages required to administer an application, course, fees, safety, security, legal duties or the student contract are service communications rather than marketing and may continue where necessary.

## 14. How we protect personal data

14.1 VSBT uses proportionate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. Measures may include:

- role-based access controls, strong authentication and least-privilege access;

- encryption in transit and, where appropriate, at rest;
- secure configuration, patching, anti-malware, backups, logging and monitoring;
- staff confidentiality obligations, data protection training and disciplinary controls;
- supplier due diligence, written data-processing agreements and security assurance;
- physical security, secure disposal and clear-desk arrangements;
- incident response, business continuity and breach-management procedures; and
- regular review, audit, testing and risk assessment.

14.2 No system can be guaranteed to be completely secure. Individuals should protect their credentials, use approved systems, report suspicious activity promptly and avoid sending sensitive information through insecure channels.

14.3 Where a personal data breach creates a risk to individuals, VSBT will assess, contain, document and respond to it. The ICO and affected individuals will be notified where the applicable legal thresholds are met.

## 15. How long we keep personal data

15.1 VSBT keeps personal data only for as long as needed for the purpose for which it was collected and for any related legal, regulatory, contractual, audit, safeguarding, insurance or dispute-resolution requirement.

15.2 Retention decisions take account of limitation periods, awarding-body and funding rules, the continuing need to verify qualifications, safeguarding obligations, the sensitivity of the data and the cost and risk of continued retention.

15.3 Appendix A provides a public summary. The approved VSBT Records Retention Schedule is the authoritative operational record and may specify longer or shorter periods for particular records. At the end of the retention period, information will be securely deleted, destroyed or irreversibly anonymised unless a lawful hold applies.

## 16. Your data protection rights

| Right                      | What it means                                                                                                                                                                               |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>To be informed</b>      | To receive clear information about how personal data is used.                                                                                                                               |
| <b>Access</b>              | To obtain confirmation and a copy of personal data, subject to applicable exemptions and the rights of others.                                                                              |
| <b>Rectification</b>       | To have inaccurate personal data corrected and incomplete data completed.                                                                                                                   |
| <b>Erasure</b>             | To request deletion in certain circumstances. This right does not apply where VSBT must keep the data or has an overriding lawful reason.                                                   |
| <b>Restriction</b>         | To request that use of personal data is limited in certain circumstances.                                                                                                                   |
| <b>Data portability</b>    | To receive certain data provided by the individual in a structured, commonly used and machine-readable format where processing is based on consent or contract and is automated.            |
| <b>Object</b>              | To object to processing based on public task or legitimate interests. VSBT must stop unless it demonstrates compelling lawful grounds. The right to object to direct marketing is absolute. |
| <b>Withdraw consent</b>    | To withdraw consent at any time where consent is the lawful basis, without affecting earlier lawful processing.                                                                             |
| <b>Automated decisions</b> | To receive safeguards and challenge qualifying significant decisions made solely by automated means.                                                                                        |
| <b>Complain</b>            | To use VSBT's data protection complaints process and to complain to the ICO.                                                                                                                |

16.2 These rights are not absolute. VSBT may refuse or limit a request where a legal exemption applies, where the request is manifestly unfounded or excessive, or where the rights and freedoms of another person would be adversely affected. VSBT will explain the reason and the available complaint route.

16.3 Individuals are responsible for keeping their information accurate and should notify VSBT promptly of changes to contact details, name, immigration status, emergency contacts, funding or other relevant circumstances.

## 17. How to exercise your rights or make a complaint

### 17.1 Rights requests

A request may be sent to [info@vsbt.co.uk](mailto:info@vsbt.co.uk) with "Data Protection Request" in the subject line or posted to the Data Protection Officer at the registered address. Please describe the request clearly and provide information that helps VSBT locate the relevant records.

VSBT may request proportionate evidence of identity and authority before disclosing or changing personal data. It will normally respond without undue delay and within one month. The period may be extended by up to two further months for a complex or numerous request; the individual will be informed within the first month.

### 17.2 Data protection complaints to VSBT

If an individual is concerned about how VSBT has used personal data, they should contact the Data Protection Officer in the first instance. A complaint can be made electronically or in writing and should identify the processing, the concern and the outcome sought.

In accordance with the Data (Use and Access) Act 2025, VSBT will facilitate data protection complaints, acknowledge a complaint within 30 days and respond without undue delay. The response will explain the outcome, any action taken and the right to complain to the ICO.

### 17.3 Complaints to the Information Commissioner

Individuals may complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection. VSBT encourages individuals to raise concerns with the College first so that it has an opportunity to resolve them.

| Information Commissioner's Office | Contact details                                                               |
|-----------------------------------|-------------------------------------------------------------------------------|
| Website                           | <a href="https://ico.org.uk/make-a-complaint">ico.org.uk/make-a-complaint</a> |
| Telephone                         | 0303 123 1113                                                                 |
| Post                              | Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF                       |

## 18. Changes to this notice and website publication

18.1 VSBT will review this notice at least annually and whenever there is a significant change to law, regulation, systems, services, partnerships, purposes, recipients, retention periods or individual rights.

18.2 The current version will be published on the VSBT website with a visible effective date. Material changes will be highlighted and, where appropriate, communicated directly to affected individuals. Historical versions will be retained so VSBT can demonstrate what privacy information applied at a particular time.

18.3 This notice should be available through the website footer and linked at relevant collection points, including enquiry and application pages, enrolment, student portals, forms, surveys, event registration and support services. Short just-in-time notices should identify the key purpose and link to this full notice.

18.4 Questions about this notice should be sent to [info@vsbt.co.uk](mailto:info@vsbt.co.uk) with "Privacy Notice" in the subject line.

## Appendix A: Indicative retention summary

The periods below provide a website-level summary and must be reconciled with the approved Records Retention Schedule before publication. A legal hold, safeguarding requirement, regulatory instruction, complaint, audit or litigation may justify longer retention.

| Record category                                    | Indicative period / retention criterion                                                                                               |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| General enquiries and prospective-student contacts | Up to 24 months after the last meaningful contact, unless a shorter period applies or the person opts out.                            |
| Unsuccessful or withdrawn applications             | End of the relevant admissions cycle plus 1 year, unless needed for complaint, equality monitoring, fraud prevention or legal claims. |

| Record category                                                   | Indicative period / retention criterion                                                                                                                                     |
|-------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Successful applicant and core student file                        | Duration of study plus 6 years after completion, withdrawal or termination, subject to awarding-body, funding and legal requirements.                                       |
| Award, transcript and qualification-verification record           | Permanent or long-term retention sufficient to verify the award and protect academic standards.                                                                             |
| Fees, payments, tax and accounting records                        | Normally 6 years after the end of the relevant financial period or relationship.                                                                                            |
| Attendance, engagement and funding evidence                       | Duration of study plus 6 years, or longer where required by a funder, regulator or audit framework.                                                                         |
| Complaints, appeals, discipline and academic-integrity case files | Normally 6 years after final closure, with longer retention for serious safeguarding, legal or precedent cases.                                                             |
| Student support, wellbeing and reasonable-adjustment records      | According to the nature of the support and legal need; normally duration of study plus 6 years, with restricted access and longer retention where safeguarding requires it. |
| CCTV footage                                                      | Normally up to 30 days, unless footage is preserved for an incident, investigation, insurance claim or legal process.                                                       |
| Website and security logs                                         | Typically up to 12 months, subject to cyber-security, audit and service-provider requirements.                                                                              |
| Marketing preferences and suppression records                     | Preference records retained as needed to respect opt-outs; campaign data retained only as long as necessary.                                                                |
| Research data                                                     | As stated in the relevant research protocol, consent information, ethics approval or funder requirement, with anonymisation where feasible.                                 |

## Appendix B: Website publication and layered-notice checklist

| Control                    | Publication requirement                                                                                                                                                                             |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Prominence                 | Place a clear "Privacy" link in the global website footer and on application, enrolment, payment, student-support and portal pages.                                                                 |
| Accessibility              | Publish as accessible HTML as the primary version. Provide the Word/PDF version as an additional download, not as the only format. Use clear headings, descriptive link text and compatible tables. |
| Point-of-collection notice | At each form, state the immediate purpose, required/optional fields, key recipients and any unusual use, then link to this full notice.                                                             |
| Cookie controls            | Use a separate Cookie Notice and consent-management tool. Do not set non-essential cookies before valid consent where consent is required.                                                          |
| Contact route              | Provide a monitored electronic data-protection complaint and rights-request route. Keep evidence of acknowledgement and response.                                                                   |
| Version control            | Display version/effective date, retain historical copies and maintain a change log.                                                                                                                 |
| Operational verification   | Check the notice against the records of processing activities, data-flow maps, supplier contracts, international-transfer register and retention schedule.                                          |
| Student communication      | Bring the notice to students' attention at application and enrolment and after material changes. Do not rely solely on passive website publication.                                                 |

END OF PRIVACY NOTICE