

## Privacy Policy

**Edinburgh Napier International College trading as Edinburgh is a division operated by Oxford International Education Group**

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

Edinburgh Napier International College t/a Edinburgh Napier University International College (ENUIC) is the data controller. If you have any questions please contact us:

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

[protectingdata@oxfordinternational.com](mailto:protectingdata@oxfordinternational.com)

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

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

Address: Units H/J/K Arlington Business Park, Gateway 1000, Whittle Way, Herts, SG1 2FP; Phone number: 01438500090; Email address:  
[dposupport@bulletproof.co.uk](mailto:dposupport@bulletproof.co.uk)

## Your Rights

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

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

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

certain types of processing such as direct marketing.

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

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

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

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

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

## Complaints

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

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

How to contact the ICO:

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

Call +44 303 123 1113

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

## PRIVACY NOTICE FOR STUDENTS, PARENTS AND GUARDIANS

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

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
Your name, date of birth, gender, addresses, email addresses and phone numbers. Your relationship to the student*	To identify you to communicate with you	Fulfilment of a contract with you
	For marketing purposes	<p>Where you have given us consent</p> <p>Necessary for our legitimate interest (to promote our schools and our educational activities)</p>
	For Debt collection purposes	Necessary for our legitimate interests (for the running of our business)
Your nationality, ethnic background, any special educational needs, special requirements or disabilities	To provide appropriate information and assistance for you	Fulfilment of a contract with you
		<p>Compliance with a legal obligation</p> <p>Where you have given us consent</p>
Next of kin and emergency contact numbers	To contact your family or close friends in the event of an emergency	To protect your vital interests

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
Your passport, BRP and visa details	To meet government immigration regulations	Compliance with a legal obligation
Bank account details*	To manage payments and refunds	Fulfilment of a contract with you
Your educational records and test or exam results from previous schools	To offer you the most appropriate courses	Fulfilment of a contract with you
Your medical information, including medications you take, allergies and dietary requirements	To help you manage your health while you are with us	Fulfilment of a contract with you
		Compliance with a legal obligation  Where you have given us consent
Your educational records and test or exam results from ENUIC	To manage your progress while studying with us	Fulfilment of a contract with you
Your attendance records and booking in/out records for school and residence	To meet government immigration and safeguarding regulations	Fulfilment of a contract with you  Compliance with a legal obligation
	To assist with debt collection	Necessary for our legitimate interest (to manage school

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
		discipline and debt collection)
Details of fees paid and any amount owed	To assist with debt collection	Necessary for our legitimate interest (to assist with the running of our school)
Details of your welfare such as how you are getting on at Edinburgh Napier University International College, safeguarding or child protection records and any problems or issues you may have had	To look after your wellbeing and meet government safeguarding regulations	Fulfilment of a contract with you Compliance with a legal obligation
Details of any behaviour issues or exclusions	To manage discipline in the schools	Necessary for our legitimate interests (to manage school discipline)
Images	For maintaining security	Necessary for our legitimate interest (for keeping our staff and students safe)
	For marketing our services	Where you have given us consent  Necessary for our legitimate interest (to promote our educational activities and show prospective

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
		students/parents what we do here)
CCTV footage*	For security management	Necessary for our legitimate interests (to maintain building and personal security)
Data about your use of information and communications systems, including Internet use	To meet our safeguarding obligations	Compliance with a legal obligation
	To administer and protect the school	Necessary for our legitimate interests (to secure our buildings)

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

#### WHEN DO WE SHARE STUDENT, PARENT OR GUARDIAN DATA?

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

Organisation Name	The Reason for Sharing
Oxford International Education and Travel Ltd and other group companies	For our central teams (eg Finance, Marketing, HR) to manage student data on behalf of Edinburgh Napier International College Ltd

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

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

#### TRANSFERRING STUDENT, PARENT AND GUARDIAN DATA INTERNATIONALLY

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

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

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

You can request further details about the safeguards that we have in place in respect of transfers of Personal Information outside of the EEA and



where applicable a copy of the standard data protection clauses that we have in place, by contacting us at [protectingdata@oxfordinternational.com](mailto:protectingdata@oxfordinternational.com)

## STORING STUDENT, PARENT AND GUARDIAN DATA

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

## PRIVACY NOTICE FOR AGENTS

This privacy notice explains how we collect, store, and use personal data about agents. Edinburgh Napier International College t/as Edinburgh Napier University International College (ENUIC) is the data controller.

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

<b>The data or type of data we process</b>	<b>The purpose of processing that data</b>	<b>The lawful bases for processing this data</b>
Names, address, email addresses, phone numbers	To communicate with you about students you have sent to Edinburgh Napier University International College (Edinburgh Napier International College Ltd); to ensure you have up-to-date information so you can provide accurate	Fulfilment of a contract with you

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

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
agreements, payment records		

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

#### WHEN DO WE SHARE AGENT DATA?

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

Organisation Name	The Reason for Sharing
Oxford International Education and Travel Ltd and other group companies	For internal reporting and auditing
The Department for Education	To provide data on international students
Regulatory bodies, such as Ofsted or the British Council	to comply with regulatory inspections
Service providers	For running surveys
Financial organisations	For processing payments
Our auditors	For carrying out legal audits of company

Organisation Name	The Reason for Sharing
Health and social welfare organisations	To manage student wellbeing
Professional advisers and consultants	To assist us in developing our business
Police forces, courts, tribunals	For dealing with legal issues

#### TRANSFERRING AGENT DATA INTERNATIONALLY

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

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

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

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

#### STORING AGENT DATA

We will keep personal information about you while you are an active agent. We create and maintain records for each agent. The information contained in these records is kept secure and is only used for purposes directly relevant to your position as an agent for Oxford International.

Once your time as an agent with us has ended, we will retain this file and delete the information in it in accordance with our Data Retention Policy.

## PRIVACY NOTICE FOR JOB APPLICANTS

This privacy notice explains how we collect, store and use personal data about applicants. Edinburgh Napier International College t/as Edinburgh Napier University International College (ENUIC) is the data controller.

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

<b>The data or type of data we process</b>	<b>The purpose of processing that data</b>	<b>The lawful bases for processing this data</b>
Details that appear on CVs and cover letters such as names, address and date of birth, education/professional qualifications	To assess your suitability for the role you have applied for and for progressing your application	To perform an employment contract with you, in the event you are successful
Interview notes/results from assessments	To assess your suitability for the role you have applied for	Necessary for our legitimate interests (to make recruitment decisions)
References from former employers	A pre-employment check to assess your suitability for the role you have applied for	Necessary for our legitimate interests (to make recruitment decisions)

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

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

## WHEN DO WE SHARE JOB APPLICANT DATA?

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

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

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

## TRANSFERRING JOB APPLICANT DATA INTERNATIONALLY

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

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

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

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

## STORING JOB APPLICANT DATA

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

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## PRIVACY NOTICE FOR EMPLOYEES

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



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

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

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

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

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
	adjustments and complying with H&S law)	

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

#### WHEN DO WE SHARE EMPLOYEE DATA?

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

Organisation Name	The Reason for Sharing
The Department for Education	To meet our obligations for sharing data with the government
The Local Education Authority	To meet our obligations for sharing data with the government
Government departments	To meet our legal obligations on matters such as tax and social security
Regulatory bodies, such as Ofsted or the British Council	To comply with regulatory inspections
Service providers	Such as companies that run surveys for us or provide travel or insurance services or venues that are hosting events for Edinburgh Napier University International College

Organisation Name	The Reason for Sharing
	including seasonal programmes or conduct criminal record checks
Financial organisations	For processing payments, administering pensions
Our auditors	For carrying out legal audits of company accounts
Police forces, courts, tribunals	For dealing with legal issues
Other education providers	Where we have partnerships
Security providers	For DBS checking services
Other employers	To provide an employment reference on your behalf and where you have given your consent to the prospective employer to contact Edinburgh Napier University International College.

### **Changes to our Privacy Policy**

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

### **Contact us**

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

Our Data Protection Officer can be contacted at [dposupport@bulletproof.co.uk](mailto:dposupport@bulletproof.co.uk).