



Privacy Notice –Students (Registered or Accepted an Offer to Study)

| Privacy Notice |
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| <p>This privacy notice explains how the University of Strathclyde will use your personal information and your rights under data protection legislation. This notice may be updated at any time. If there are any changes which affect your rights and interests, we will make you aware of this and how it will affect you.</p> <p>In some cases, you may be provided with a more detailed privacy notice to supplement this central notice. This is to increase transparency and provide additional information.</p> |
| Who we are |
| <p>The University of Strathclyde is the organisation responsible for your personal data in terms of data protection legislation (the data controller).</p> <p>When we refer to the ‘University’, this includes any other entities in the University’s global group, including University of Strathclyde, Bahrain. We hold your personal data securely and restrict access to personal information to people who need to use it in the course of their duties. When collecting and processing information about you, we must comply with relevant privacy legislation: UK General Data Protection Regulation (GDPR); the UK Data Protection Act 2018; and other privacy laws that apply in the countries in which the University operates, e.g. EU GDPR; Bahrain Personal Data Protection Law (PDPL).</p> |
| Information we collect and use about you |
| <p>When you register as a student at the University we will create a central ‘student record’ for you. This consists of the information provided in your application and other additional information we may ask you to provide during the registration process. Other information will be added to this central record, or held in different locations across the University, during the course of your relationship with the University. Information about you, including ‘special category’ data will be processed and held in relation to:</p> <ul style="list-style-type: none">- personal and family details (including emergency/wellbeing contact details);- social circumstances, e.g. socio-economic background, equality data, disability etc.- education/academic background and qualifications;- employment background/experience (where relevant);- education and student records (including information relating to your relationship/experiences at the University, including academic/research, absence/attendance, disciplinary issues, building access, engagement, e.g. via online learning platform Myplace etc.)- financial information, including transactions for paid-for goods/services;- disciplinary and attendance records;- visual images (for identification/authentication purposes);- goods or services provided (including services relating to library, careers, wellbeing, counselling, disability etc.) |

'Special category' personal data may also be processed, where it is appropriate and lawful for us to do so. In most cases you have the option whether or not to provide this information. Special category data relates to:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- genetic data or biometric data (for the purpose of uniquely identifying a natural person);
- health data (mental or physical);
- sex life or sexual orientation.

This data, along with data relating to criminal convictions and offences/charges is subject to additional protections. You will be asked to declare relevant criminal convictions and offences/charges and for some courses you will be required to undergo a PVG check.

Why we require this information

The University collects, holds and uses a wide range of information about you for various reasons including:

- academic and research purposes: providing learning, teaching, research and support services. This includes: monitoring; supervising; advising; assessing; recording academic progress and achievements; managing the research process (including applications, financial management/reporting, open access of data/outputs, data preservation etc.); academic integrity, e.g. use of anti-plagiarism software; producing analyses and analytics relating to learners;
- provision of student services, including wellbeing and pastoral support, e.g. IT, library, careers, wellbeing, counselling, disability services etc.;
- administrative purposes: contacting/communicating with students; administering fees; management and assessment of funding (including 'hardship' funds, bursaries, scholarships and 'right to work' eligibility for Graduate and Degree Apprenticeships) and paid-for services, e.g. for sports centre membership/accommodation services; campus and facilities administration (including IT provision; building/room access; timetabling etc.); conducting surveys; conferring and verifying awards;
- managing University policies and procedures, e.g. maintaining academic standards, complaints, appeals and disciplinary matters, fitness to practise etc.;
- external reporting to professional accreditation bodies;
- management and statistical reporting and planning purposes;
- duty of care/pastoral care, health and safety, safeguarding and wellbeing requirements and associated legal obligations;
- security, public safety and the prevention and detection of crime (including criminal conviction/charge declarations and PVG processes); use of CCTV systems;
- legal and statutory obligations and reporting, e.g. [Higher Education Statistics Agency \(HESA - now part of Jisc\)](#); equality of opportunity and treatment; health and safety; immigration and visa compliance (the University's legal and statutory obligations will depend on which country's laws apply to the specific purpose e.g. the University of Strathclyde, Bahrain must comply with Bahraini legislation in relation to immigration etc.);
- to exercise or defend legal claims or comply with court judgement/orders;
- promotional and publicity purposes; and
- archiving and research.

Lawful basis

The University requires a lawful basis for processing personal data. In some cases, there may be more than one lawful basis that applies. Most routine processing relates to the lawful bases of public task and contract. However, we may rely on the following lawful bases, depending on the circumstances:

- consent;

- contract;
- legal obligation;
- vital interests;
- public task;
- legitimate interests.

Special category data can be processed when one of the lawful bases listed above applies **and** one of the following:

- explicit consent;
- vital interests;
- establishment, exercise or defence of legal claims;
- substantial public interest;
- public interest in the area of public health;
- archiving in the public interest, scientific or historical research purposes or statistical purposes.

Who we share your information with

A list of the most common circumstances in which we will share your data is below. There may be other situations in which we will share your data when it is necessary and lawful to do so.

- Partner institutions, e.g. student exchanges/study abroad; work placements; joint/collaborative provision agreements; preparation and pathway courses for international students (including pre-sessional English language courses and Strathclyde International Study Centre).
- External funders/sponsors or employers who provide financial and/or other support e.g. embassies; research councils; external funding bodies, e.g. SAAS, SDS, SFC; scholarship/bursary providers; employers on Graduate Apprentice programmes;
- University academic and administration purposes: e.g. external examiners; members of relevant committees (including members external to the University);
- Professional and industrial bodies, including for membership and accreditation purposes, e.g. NHS bodies, Law Society of Scotland, General Teaching Council for Scotland etc.
- Study/work placements or student exchange/study abroad opportunities;
- Legal or statutory reporting, e.g. [HESA](#), UK visa and immigration bodies; electoral registration officers; government departments;
- Graduation information and ceremonies: publication in the press if you have consented to this; audio and visual images of ceremonies;
- Membership purposes of University of Strathclyde Students' Association (Strath Union/USSA);
- Verification of your attendance/award;
- Provision of references to potential employers or providers of education who you have approached;
- Bodies/individuals involved in managing emergency situations, including public health issues;
- Where we have serious concerns about your well-being (this may include contacting an emergency and/or 'wellbeing contact');
- Third party providers of personalised, branded goods;
- Higher Education bodies, e.g. HEFCE, UK Research and Innovation, Universities and Colleges Admissions Service, organisations running the National Student Survey and/or other leaver surveys etc.;
- External regulators, e.g. the Scottish Public Services Ombudsman (SPSO), Office of the Scottish Information Commissioner (OSIC); Information Commissioner's Office (ICO) etc.;
- Authorised agents working internationally representing and promoting the University;
- Organisations providing professional services to the University, e.g. lawyers, insurance providers etc.;
- Police, law enforcement agencies or other bodies with regulatory powers, including in relation to benefits and taxes and visas and immigration.

[University of Strathclyde, Bahrain](#) is part of the University of Strathclyde. As a global organisation, personal data is shared between these entities and any third parties helping us to deliver our educational offering in Bahrain, including Study Group, Bahrain. Study Group, Bahrain is a Controller working jointly with Strathclyde to deliver courses. If you study at University of Strathclyde, Bahrain, relevant staff at UK campuses will also need access to your personal data for the purposes set out in this notice.

Transferring data internationally

Some personal data including attendance and progress information will be shared outside the UK if you participate/apply to participate in an international student exchange/study abroad programme, or you are studying at Strathclyde as part of a joint/collaborative provision agreement with an international organisation.

International student sponsors or providers of bursaries/scholarships are likely to require regular updates on attendance/progress. If you apply via an international agent then some data will be shared with the agent during the application stage and then to confirm registration.

In some cases, the University may engage third party organisations to hold/process data on its behalf. Whenever we transfer data internationally we will make sure that appropriate safeguards are in place to protect your information and your rights to privacy.

As the University operates globally, we may need to transfer and process your personal data in a country other than the one you are currently in (if outside the UK), or you applied to study in. This is necessary to provide you with information, process your application, to meet legal obligations, to fulfil a contract, or where we have your consent. If you apply to study at University of Strathclyde, Bahrain, relevant staff at UK campuses will also need access to your personal data to process your application. The Kingdom of Bahrain recognises the United Kingdom as providing adequate regulatory and legislative protection for personal data.

When processing and transferring data internationally, we will always:

- make sure we apply appropriate safeguards to protect your information and your rights under privacy laws; and

apply the same high standards of privacy and security wherever we process your personal data.

How long your information is retained

The University will retain your personal data as long as necessary for the purposes described above. Please note that after completion of your studies the University requires to hold your personal data for a period of time to satisfy statutory/legal obligations and/or to meet administrative requirements. Some data will be retained permanently to ensure a record of your educational achievements is retained. The University's [records retention schedules](#) can be found on our website.

After your relationship with the University ends, some information is also retained by the University's Alumni and Development Office (ADO), in order for them to maintain alumni relationships. ADO have separate [privacy notices available in relation to Alumni and Development](#) activities.

Your rights

Under data protection legislation, you have a number of rights* including the right to:

- withdraw consent, at any time, where that is the lawful basis of our processing;
- access your personal data and obtain a copy, free of charge;
- rectify inaccuracies in personal data that we hold about you;
- erasure, that is have your details removed from systems that we use to process your personal data;
- restrict the processing in certain ways;

- obtain a portable copy of data you have given to us in a commonly used electronic form; and
- object to certain processing of your personal data by us.

***Please note that the ability to exercise these rights will vary and depend on the lawful basis under which the processing is being carried out.**

Please note that if your information is processed in accordance with different data protection legislation, e.g. Bahrain's Personal Data Protection Law (PDPL), then your rights, whilst broadly similar to those above, may vary depending on the applicable legislation.

Please contact dataprotection@strath.ac.uk if you wish to exercise/enquire about any of these rights.

Complaints

If you wish to make a complaint about how we have handled your personal data, you can contact the Data Protection Officer at dataprotection@strath.ac.uk.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you also have the right to complain to the Information Commissioner's Office (<https://ico.org.uk/concerns/>).

For personal data processed under Bahrain PDPL, you may lodge a complaint with the Bahrain [Personal Data Protection Authority](#)