

# Privacy Notice - Applicants and Potential Applicants to Study at the University

<b>Privacy Notice</b>
<p>This privacy notice explains how the University of Strathclyde will use your personal information and your rights under data protection legislation. This notice covers central University processes and 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>
<b>Who we are</b>
<p>The University of Strathclyde is the organisation responsible for your personal data in terms of data protection legislation (the 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>
<b>Information we collect and use about you</b>
<p>We collect information about potential applicants and applicants which is necessary for the reasons set out in the next section. This includes information about you relating to:</p> <ul style="list-style-type: none"><li>- biographical and contact information;</li><li>- education and qualifications;</li><li>- references;</li><li>- disabilities (this is 'special category data' under the legislation);</li><li>- visa requirements;</li><li>- course preferences; and</li><li>- any other information necessary to meet the purposes and obligations set out below.</li></ul> <p>Applicants/potential applicants who wish to discuss applying with a criminal conviction/charge may disclose relevant information to us and we will process this to deal with your enquiry.</p>
<b>Why we require this information and our lawful basis</b>
<p>For both applicants and potential applicants, we will process your information to:</p> <ul style="list-style-type: none"><li>- respond to enquiries and/or send relevant marketing materials;</li><li>- provide information and advice about the University, e.g. course information, studying at the University, accommodation, finance/funding; disability and counselling and other services etc.;</li><li>- contact you following an event/recruitment fair etc., where you consented to us contacting you;</li><li>- manage your account on the University direct application system, if you apply directly;</li><li>- contact you to ask you to complete a survey regarding your choices/decisions;</li><li>- manage the application process and provide relevant information including: arranging interviews; assessing applications; making decisions regarding offer/entry to the University etc.;</li></ul>

- obtain relevant information in relation to identity; education and qualifications; references;
- advise on visa requirements and obtain relevant supporting documentation;
- inform any agent representing you, i.e. international recruitment agents, of the progress, status and outcome of your application;
- to ask you to complete a survey regarding your choices/decisions;
- for equality monitoring purposes and to provide information/support where necessary, e.g. in relation to disabilities;
- to verify your qualifications, where it is necessary to do so, including to ensure compliance with applicable immigration laws and visa requirements in the location where you wish to study, e.g. applicants to the University of Strathclyde, Glasgow will be subject to UK immigration/visa requirements. Applicants to the University of Strathclyde, Bahrain must meet the visa/immigration requirements of the Kingdom of Bahrain.
- provide advice on applying with relevant criminal charges/offences; and
- archiving and research.

Depending on the personal data and the specific purpose we will rely on one of the following lawful bases:

- legitimate interests
- consent
- contract or steps necessary to enter into a contract
- public task
- legal obligations

Special category and criminal offence data can be processed when one of the lawful bases above applies and one of the following conditions also applies:

- explicit consent
- vital interests
- substantial public interest
- archiving in the public interest, scientific or historical research purposes or statistical purposes.

We will only send you electronic marketing information about the University where you have requested this, we have your consent or are otherwise legally able to do so.

### **Disclosing your information**

Your personal data will only be shared with third parties working with or on behalf of the University, e.g. international agents/representatives. In some cases, the University engages third party organisations to hold/process data on its behalf. Whenever we transfer your data we will make sure that appropriate safeguards are in place to protect your information and your rights to privacy.

The [University of Strathclyde International Study Centre \(ISC\)](#) provides specialist degree preparation for international applicants studying abroad. ISC programmes are provided by a third party, Study Group, in collaboration with the University. If you are an international applicant who is unsuccessful in your application to Strathclyde, the University will assess your application for eligibility to the University of Strathclyde International Study Centre programmes. Eligibility is based on various factors such as academic qualifications, study gap (calculated from the date of graduation (on previous study) to the course start date), funding and visa length, and entry requirements (these are set by Study Group and can found [on their website](#)).

If your application is assessed as likely to be eligible for an ISC programme and you consented at application stage, the University will contact you by email, to advise you that your data will be passed to Study Group. The email will provide another option to opt out of this process. If you opt-out your data will not be shared with Study Group. You can opt out at any point by emailing ISC Referrals [isc-referrals@strath.ac.uk](mailto:isc-referrals@strath.ac.uk) and, if relevant, the University will arrange for your data to be removed by Study Group. Once your data has been transferred to Study Group they will send you relevant [privacy](#) information, setting out what they do with your personal information.

The University will undertake verification checks on certificates/documentation you provide, to ensure these are genuine. These checks may be undertaken by a trusted third party, in which case you will be directed to their website during the application process. You will then be asked to provide relevant information directly to the company, with the outcome being made available to the University.

[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 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.

### Transferring data internationally

In some cases, the University works with international agents/representatives, acting outside the UK. Whenever we transfer your data outside the UK we will make sure that appropriate safeguards are in place to protect your information and your rights to privacy.

Where the University, or third parties acting on its behalf, collects personal data for contact/marketing purposes whilst undertaking events outside the UK, this information will be transferred outwith the country/territory it was collected in and will be uploaded to University systems.

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

**Potential applicants:** we will only retain your personal information for as long as required to: provide you with the information you have requested; to respond to any queries; or to send you relevant information about the University and its courses.

If you start but do not complete and submit your application on our direct application system, your data will be retained for six months from your last activity. If you go on to complete and submit your application, we will retain your information as set out below for applicants.

**Applicants:** details of how long data is held for both unsuccessful applicants and for those who go on to study at the University, is set out in the [Student Retention Schedule](#).

### Data is required as part of a statutory or contractual requirement or obligation

Some information is processed under the lawful basis of 'contract' as you will be entering into a contract with the University when you accept a place to study and/or for other services, e.g. accommodation.

### Your rights

Under UK 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](mailto: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](mailto:dataprotection@strath.ac.uk).

If you are not satisfied with our response or believe we are not processing your personal data in accordance with UK 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](#)