

## Student Privacy notice: prospective, current and former student data

CITY College, University of York Europe Campus needs to hold and process personal data relating to its students: (a) in order to keep proper records, provide support and guidance to students and monitor academic progress; (b) in order to both run the business and activities of the College, and (c) in order to fulfil our legal obligations.

We hold financial, sponsorship and fees data so that we can invoice students correctly and record payments; information on health and disability so that we can properly support students; academic information so we can track progress and provide appropriate learning and teaching support and opportunities; information related to employability and career opportunities.

In addition, CITY College needs to hold and process personal data relating to those seeking to become students (prospective students and applicants), in order to support and guide prospective students, assess academic suitability for admission, and facilitate the admission process, including assessing their academic records and achievements from previous and other studies, keep track of their visa and residence permit applications and relevant procedures and documentation (for International students).

For further information on how we use your data in accordance with data protection law see, General Data Protection Regulation for Applicants (GDPR).

CITY College, University of York Europe Campus takes the security and integrity of all the personal data it holds very seriously. We have an Information Security Policy and specific staff are trained in Data Protection. We believe our systems are secure. We do not release information about students to any third parties outside the College unless we have a legal obligation to do so, or in very specific and limited circumstances; which are listed below. We do not release information about students to others except those derived from the contractual agreement (as declared in "Terms and Conditions relating to your Offer"), and additionally in very serious emergency situations.



The handling of personal data is controlled by the General Data Protection Regulation (GDPR) and associated legislation. CITY College is obliged to provide you with the following information which explains in detail how and why we are processing your personal data and explains your legal rights. General information on Data Protection law is available from the Department of Academic Services at acadreg@york.citycollege.eu

**Data Controller**: CITY College, University of York Europe Campus **Data Protection Officer:** Evangelos Ergen, Head of Academic Services

(ergen@york.citycollege.eu)

Supervisory Authority: Hellenic Data Protection Authority

#### How and why we are processing your personal data and your legal rights

#### Categories of information

Personal information, contact details, residency, nationality, educational history & background, employment history, reference letters, supporting statements, disabilities, corresponding address, parents/sponsors contact information, immigration data and documents for visa and residence permit, student's progress and attendance data, academic information during the studies, financial/banking data.

#### Special data

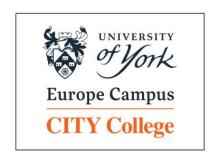
'Special categories of personal data' which CITY College keeps in records are defined as information relating to the following:

- Racial or ethnic origin
- Health (or health conditions/disability)

CITY College, University of York Europe Campus may use this data, but only in specific and restricted circumstances, and always in accordance with Article 9 of the GDPR.

#### Sources of information

- Provided by students
- Agents and recruitment consultants
- Partner institutions
- CITY College's appointed insurers and brokers
- Financial Sponsors
- Research Councils



#### Purposes of processing

Information provision according to contractual agreement and legitimate purposes. Applicants/Students assessment, academic management/progression, document administration, academic performance review, debt attendance, equal opportunities monitoring, payment processing, legal and statutory compliance, student records management, academic support, careers service activities, students' service activities.

#### Legal basis for processing

The processing complies with the General Data Protection Regulation following the legitimate purposes and principles of processing personal data.

#### Transfers outside the EU

CITY College, University of York Europe Campus transfers student data outside the European Union.

#### This applies:

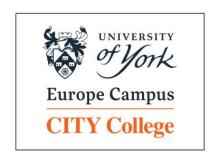
- a) in relation to those students who are applying to study at CITY College and are from countries outside EU. In order to properly administer their applications and provide appropriate support, CITY College will share personal data with partner institutions or offices or recruiters/consultants located in the specific countries. The legal basis for these transfers is contained within clause 6(1)b and c(1)f of the General Data Protection Regulation; and
- b) sharing of information with outside EU agents, sponsors and embassies, consulates or relevant public authorities (Article 61.(a)); and c).

#### Retention periods

CITY College, University of York Europe Campus needs to be able to confirm who has been a student; whether they have successfully completed their studies or not, and needs to be able to do this for all previous years. Therefore, certain information about former students will be retained permanently. Documentation relating to students will be retained for six years after the completion of studies.

#### Access rights

You are entitled to a copy of all the information CITY College holds about you, although you may not be able to receive information which identifies or relates to anybody else. If you would like a copy of your records, please contact the Department of Academic Services at acadreg@york.citycollege.eu. In order to help us provide you with the information as quickly as



possible, it would be very helpful if you could provide us with as much information as possible, particularly if you can specify which sort of information you are interested in. You will be required to provide proof of identity, such as an official public document (state ID or passport), photograph and a signature.

#### **Portability**

You have the right to move your personal data to another data controller. However, this right is limited to the following circumstance:

- data which you have provided directly to CITY College yourself
- data which is used in order to fulfil a contract or is in preparation for a contract
- the data is automated (ie this right does not apply to paper records).

In order to exercise this right, please contact CITY College's Department of Academic Services.

#### **Erasure** (right to be forgotten)

The right of erasure (the right to be forgotten) does not apply to student data held by CITY College. However, any personal data held solely for the purpose of marketing can be erased. In order to exercise this right, please contact CITY College's Department of Academic Services.

#### Restriction/Objection

The law gives you the right to object to processing of your personal data carried out by CITY College and/or to ask CITY College to restrict processing of your personal data. These are not absolute rights (except for the right to prevent use of your personal data for marketing and fundraising purposes) and apply only in limited circumstances. You can object to your data being used for research or statistical purposes, but not where the research is being carried out in the public interest. You can also ask CITY College, University of York Europe Campus to restrict any processing of your data if you think the data we hold about you is inaccurate. The rights of objection and restriction are complicated and each instance will be assessed individually. If you wish to exercise either of these rights, please contact the Department of Academic Services.

#### Withdrawal of consent

You have the right to stop any processing which is based solely on your consent:

- advertising and promotion of the University, its goods and services
- fundraising (this does not include information relating to applications which will include information about your prospective department, opportunities to visit and scholarships).



Please contact the Department of Academic Services, or the appropriate department (e.g. Students Services & Alumni, Employability, etc)

#### Complaints to Hellenic Data Protection Authority

If you feel that CITY College has not dealt correctly with your personal data you can complain to the Hellenic Data Protection Authority.

#### Consequences of not providing data

CITY College, University of York Europe Campus relies on having up to date and correct information about its students. Students have a responsibility to inform CITY College if your personal details change, and give us a chance to put things right. CITY College will only ask you to provide information for which it has a genuine need. If you fail to provide any requested information, there is a chance that your records could be incorrect or incomplete and this could lead to problems which take time and trouble to sort out.