



London School of Business and Finance Privacy Policy

Welcome to the London School of Business & Finance (LSBF) privacy notice. LSBF takes the protection of your personal data very seriously and are committed to protecting and respecting your privacy.

The EU General Data Protection regulation (GDPR) and the Data Protection Act 2018, gives people the right to know what information is held about them, and requires LSBF to ensure that personal information relating to living individuals is handled properly, held in confidence and is protected from inappropriate disclosure to third parties.

As part of our legal obligations we have published Staff, Student and General Privacy notices. Where required local privacy notices will be issued to inform individuals about what personal data is gathered, how it is used, stored and retained.

Data Controller

London School of Business & Finance ("LSBF" also referred to in this notice as "we" or "us") is registered as a data controller of your personal data with the Information Commissioner's Office (our notification number is ZA111888), and is part of The Global University Systems B.V. group of companies which is made up of different legal entities, details of which can be found at: www.globaluniversitysystems.com.

LSBF registered address in England and Wales is Sceptre Court, 40 Tower Hill, London, EC3N 4DX, United Kingdom.

Our Data Protection Officer

If you have any questions about LSBF's privacy policies, please contact the Data Protection Officer at London School of Business & Finance, 30 Holborn, Buchanan House, London EC1N 2HR. E-mail dpo@lsbf.org.uk

How to Use This Privacy Policy

LSBF holds and processes information about many different types of people such as its current, past or prospective employees, visitors to its website, applicants, students and alumni & supporters. It also processes personal information for a variety of reasons. LSBF may also be required by law to collect and use certain types of personal information to comply with statutory requirements. For each category of personal data process, you will find the following headings:

Personal information we collect and use

More information on how LSBF collects and uses personal information can be found in the relevant privacy notices below:

How we use your information

Cookies

Our website <https://www.lsbfi.org.uk/> uses cookies. For more information on our cookies use, please read our cookies statement on our website.

Where we collect your personal information from

We may collect personal information about you from the following sources:

- Directly from you
- Cookies – see our cookie statement which can be accessed from our website
- Analytics providers, such as Google Analytics

Applicants and Students Privacy Notice

London School of Business and Finance (LSBF) takes the protection of your personal data very seriously and are committed to protecting and respecting your privacy.

When processing your Personal Data, LSBF is obliged to fulfil individuals' reasonable expectations of privacy by complying with the General Data Protection Regulation (the GDPR), the Data Protection Act 2018 (DPA), and other relevant legislation and regulations (collectively "Data Protection Law").

Purpose of this Notice

This privacy policy sets out the basis on which any personal data we collect from you, or that you or any third parties provide, will be processed by us. We may withdraw or modify this notice at any time and we may supplement or amend this notice by additional policies and guidelines from time to time. We will notify you if this notice is amended.

London School of Business and Finance (LSBF) "also referred to in this notice as "we" or "us") is a data controller (which means we are responsible for deciding how we hold and use your personal information) of your data and is part of The Global University Systems B.V. group of companies which is made up of different legal entities, details of which can be found at <https://www.globaluniversitysystems.com>.

"Personal data" refers to information relating to a living, identifiable individual. It can also include "special categories of data", which is information about your racial or ethnic origin, religious or other beliefs, and physical or mental health, the processing of which is subject to strict requirements. Similarly, information about criminal convictions and offences is also subject to strict requirements.

"Processing" means any operation which we carry out on your personal data e.g. obtaining, storing, transferring and deleting.

Your personal information

We hold a range of personal data about you, some of which you provide to us direct and some of which we receive from third parties, such as UCAS, where relevant. See below for further details of personal data we receive from third parties. Examples of categories of personal data which we hold are: your contact details, prior educational experience/attainment, immigration information (e.g. passport details, language proficiency), where relevant, health information (including any disabilities) and other equality-monitoring data you provide to us. In addition, if you come to study with us, we process data about your academic performance, attendance and progression, and where relevant, breaches of our policies (e.g. academic or other misconduct concerning LSBF-related activities). We also process contact and educational details after you have completed your programme or your activities with us are otherwise terminated.

The purposes for which we process your personal data and the legal basis

When you are an applicant, we process your personal data for the purposes of assessing your eligibility to be offered a place on one of our academic or professional programmes. If you take up a place at LSBF, we process your personal data for the purposes of providing our academic or professional programmes and related services.

If you are unsuccessful or do not take up a place at LSBF, we will retain your personal data in line with our retention schedules for statistical and audit purposes or in the event of a complaint or an appeal.

We only process data for specified purposes and if it is justified in accordance with data protection law. The table below lists the various purposes for which we process personal data and the corresponding justification for it. Some processing of your personal data is justified on the basis of contractual necessity. In general, this applies to personal data you provide to us to process your application and if enrolled, to monitor academic performance. Without that information, we would be unable to provide you with your chosen academic programme and related support services. Some personal data is also required to fulfil our legal obligations regarding immigration. A failure to provide that information would prejudice your application for a Tier 4 visa.

No	Purpose	Legal basis / justification
1	Assessing eligibility to undertake our academic or professional programmes.	Processing is necessary for the purposes of taking steps prior to entering into a contract with us
2	Supporting applicants through the application process and providing further information on the services we can offer	Necessary for negotiating to enter into a contract and legitimate interests in providing support to applicants

3	Provision of academic or professional programmes and related services (including IT and library services).	Necessary for performing a contract, i.e. to provide your chosen academic programme. This can be a contract with us or a contract between you and your home institution (“contractual necessity”)
4	Identifying students and assisting them in trying to succeed in their learning via the dashboard system.	Contractual necessity and legitimate interest in assisting our students to succeed in their studies
5	Assessment of academic progress and performance (including attendance), and where necessary providing support	Contractual necessity
6	Financial Administration (including provision of loans and bursaries)	Contractual necessity
7	Administration of extenuating circumstances procedures.	Contractual necessity
8	Administration of complaints, academic appeals, interruption and withdrawal, fitness to study and fitness to practice procedures.	Contractual necessity
9	Immigration matters.	Necessary for us to comply with our legal obligations in relation to students who hold Tier 4 visas. Such processing may also be in the public interest.
10	Making reasonable adjustments for disabilities and providing relevant support to students with ill health and providing wellbeing support. This includes processing special category information.	Explicit consent.
11	Employability Support	Contractual necessity and our legitimate interest in assisting our students and alumni to progress in their careers.
12	Regulating LSBF’s community (including dealing with misconduct under our procedures for academic and other misconduct including disciplinary procedures)	Contractual necessity and our legitimate interest in maintaining academic standards and the good order of LSBF community.
13	Obtaining payment of fees.	Contractual necessity and our legitimate interest in obtaining payment for the services we provide.
14	Protecting our property and assets (e.g. by dealing with misconduct)	Necessary for our legitimate interest in safeguarding our property and assets.

15	Providing appropriate I.T. and other infrastructure facilities e.g.a virtual learning environment	Contractual necessity; legitimate interest in providing a proper infrastructure to support the provision of academic or professional programmes and related student services.
16	Communicating with students	Contractual necessity and our legitimate interest in marketing LSBF and promoting student welfare.
17	Registering alumni to maintain an alumni network	Necessary for our legitimate interests in maintaining an alumni network, and marketing
18	To facilitate data-gathering to improve our educational services, our website, and our marketing efforts.	LSBF's legitimate business interests such as managing and developing its business

There may be other processing in addition to the above, for example, when you access our website which uses cookies or when we take photos of our events and publish them. This is done on the basis of our policies and we will inform you about such processing at the time when the data is obtained or as soon as reasonably possible thereafter.

Where the basis of processing your personal data is contractual necessity and you fail to provide the personal data in question, LSBF may not be able to process your application or provide you with the programme for which you have applied. A failure to provide immigration-related data may result in failure to obtain a Tier 4 visa for those who students who require it.

Personal data received from third parties

No	Purpose	Legal basis / justification
1	Assessing eligibility to undertake our academic or professional programmes.	Processing is necessary for the purposes of taking steps prior to entering into a contract with us
2	Supporting applicants through the application process and providing further information on the services we can offer	Necessary for negotiating to enter into a contract and legitimate interests in providing support to applicants
3	Provision of academic or professional programmes and related services (including IT and library services).	Necessary for performing a contract, i.e. to provide your chosen academic programme. This can be a contract with us or a contract between you and your home institution ("contractual necessity")
4	Identifying students and assisting them in trying to succeed in their learning via the dashboard system.	Contractual necessity and legitimate interest in assisting our students to succeed in their studies
5	Assessment of academic progress and performance (including attendance), and where necessary providing support	Contractual necessity

6	Financial Administration (including provision of loans and bursaries)	Contractual necessity
7	Administration of extenuating circumstances procedures.	Contractual necessity
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9	Immigration matters.	Necessary for us to comply with our legal obligations in relation to students who hold Tier 4 visas. Such processing may also be in the public interest.
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Personal data received from third parties

Recipients of personal data

On occasion we may need to share your data with third parties. The following table lists what information we may share with whom

No	Recipients	Data which we may share with them
1	Companies within the group	Contact details, Course information where students and graduates are interested in entrepreneurship activities and relevant employability activities
2	Placement providers	Your CV as well as any accessibility and assistance requirements and related information.
3	Co-curricular and/or extracurricular excursion providers	Accessibility and assistance requirements and related information.
4	Your employer if you are an apprentice.	Details as to how you are performing in the academic part of your apprenticeship.
5	Your employer or sponsor if you are a sponsored student.	Details as to how you are performing and attendance in your course.
6	External examiners.	Identification details and exam papers.
7	Turnitin.	Identification details and assessment papers in order to detect plagiarism
8	Education and Skills Funding Agency if you are an apprentice.	Student details including course and employer information and academic progression.
9	End point assessor if you are an apprentice	Identification details and assessment details.
10	UK Home Office	Passport details; contact details; programme details including attendance, placement details and work experience; fees and housing details
11	Data processors i.e. third parties who process personal data on our behalf e.g. software providers or marketing service providers	Application details; attendance records or contact details which are not retained by the third party

12	Local Authority (including the electorate office).	Contact details and course details where there's a legal basis.
13	Student Loans Company.	Contact details and course details including progression.
14	LSBF's insurers and internal and external auditors, Health and Safety Executive in respect of accidents or incidents connected with the company.	Student details and details in relation to any incident.
15	Regulatory bodies, where you are on a professional programme	Contact details, attendance and progression information and potentially disciplinary or fitness to study or fitness to practice issues
16	Government agencies i.e. HMRC Police*	Contact details and potentially other information if requested where there is a legal basis.
17	London Borough of Holborn or other members of the Channel Panel, a programme which provides support to individuals who are at risk of being drawn into terrorism as defined in Part 5, Chapter 2 of the Counter Terrorism and Security Act 2015.	Contact details and other information that LSBF could be required to supply in order to comply with the Counter Terrorism and Security Act 2015.
18	Potential employers or other companies requesting a reference or confirmation of qualifications	Attendance, progression and performance details including disciplinary or academic misconduct issues or breaches of the LSBF's regulations.
19	Close family, next of kin and emergency services where there is an emergency situation such as illness or serious injury	Personal data including potentially special category data if necessary
20	Other UK based and international educational institutions which the LSBF partners or collaborates with to deliver placements, study abroad programmes, dual awards, franchised or validated awards or any articulation or progression agreement.	Contact details, attendance, progression and performance details and details of any disciplinary or academic misconduct issues or breaches of LSBF's regulations
21	Higher Education Statistics Agency ("HESA"); Office for Students and Government Departments such as the Department for Education for analysis of student data or to carry out statutory functions.	Personal details, progression and performance details, details of the Destination of Leavers' Survey. The privacy notice for the Office for Students including sensitive data that they may hold, can be found here https://www.officeforstudents.org.uk/privacy/ . The privacy notice for HESA can be found here https://www.hesa.ac.uk/about/website/privacy
22	External debt collection agencies, in relation to student debts where LSBF's own recovery attempts have proven unsuccessful.	Contact details and details of debt

* This will only be shared on request and where there is a legal basis for doing so.

Overseas transfers of personal data (i.e. outside the European Economic Area (EEA))

Where possible, we aim to hold personal data relating to students within the EEA. Where any of your personal data is transferred outside the EEA it will be subject to a legally binding data sharing agreement and to an adequacy decision by the European Commission (country, territory or specified sectors), or other appropriate safeguards as set out in Article 46 of the GDPR.

Retention of data

The length of time that we keep your personal data for is set out in the Student Records Retention Schedule, please contact dpo@lsbf.org.uk for more information.

Your rights as a data subject

As a data subject, you have the following rights in relation to your personal data processed by us:

- To gain access to your personal data;
- To rectify inaccuracies or where appropriate, given the purposes for which your data is processed, the right to have incomplete data completed;
- To have your personal data erased. This is a limited right which applies, among other circumstances, when the data is no longer required, consent has been withdrawn and/or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest;
- To object to the processing of your personal data for marketing purposes. You may also object when the processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing.
- To restrict the processing of your personal data. This is a limited right which will apply in specific circumstances and for a limited period.
- To obtain a copy of your data in a commonly used electronic form if the data is processed by automated means and the processing is based on your consent or contractual necessity.
- To not have decisions with legal or similar effects made solely using automated processing, unless certain exceptions apply.

Where we are relying on your consent to process your data, you may withdraw your consent at any time. Your requests will be considered at the latest within one month.

Exercising your rights, queries and complaints

For more information on your rights, if you wish to exercise any of the above rights or for any queries you may have or if you wish to make a complaint, please contact our Data Protection Officer at LSBF, 30 Holborn, Buchanan House, London, EC1N 2HR

E-mail: dpo@lsbf.org.uk

Complaints to the Information Commissioner

LSBF maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with the Data Protection Legislation. LSBF registration number is ZA111888 and sets out, in very general terms, the full range of purposes for which we use, students and all other personal information. Please visit the Information Commissioners Office website for details.

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>.