Privacy Notice – Admissions

Activity/Processing being undertaken

Edinburgh Napier University provides this information to explain how we use your personal data. Protecting your personal data is important to us and we only collect and process data which is necessary for us to provide the information, services and goods you require. This is in compliance with UK data protection legislation ("the legislation"), that is, the UK Data Protection Act 2018 ("DPA 2018") and the General Data Protection Regulation: EU 2016-679 ("GDPR") as amended by "EU Exit" Regulations 2019 and now known as the UK GDPR.

Who is collecting the information?
Edinburgh Napier University as the "Data Controller".

Why are we collecting your personal data (purposes)?

We are collecting data so that your application to study with us may be considered.

The information you provide will be used to:

- Review and consider your application and respond to you if you are successful. The decision-making process may require the University to contact external parties where this is relevant to your application e.g. fitness to practice enquiries for courses where this is a legal requirement, including previous Universities, other educational institutions, funding bodies, etc.
- Contact you for further information if your application is incomplete or documentation is required.
- To keep you informed of relevant news, events and other information about studying at Edinburgh Napier University.
- To send you marketing materials advertising additional opportunities, events, initiatives, etc. which are not specifically related to your enquiry, where you have given consent for us to do so. This may include creating social media custom audiences, where your data is matched by social networking sites in order to provide you with the most relevant adverts on those social media sites. Our purposes include sending you information about other opportunities in the event that your initial application/s is not successful.
- Statistical analysis and market intelligence.

If you apply to us through the University and Colleges Admissions Service (UCAS), a partner institution, we will receive the required data through electronic transmission and process your data through our Admissions Service at Edinburgh Napier University.

If you apply to us directly either through our on-line application process or through one of our international partners/agents, your data will be received directly into our systems and processed through our Admissions Service at Edinburgh Napier University.

We may also use personal data collected to enable us to conduct surveys, following application/s, to better understand why an applicant has accepted or declined an offer. Application-related services are an important aspect of our mission as a university and public authority and post-application feedback is vital to help us improve our services in order to give our applicants the best possible experience.

How are we collecting this information?

We are collecting information from the following channels:

- From Applications transmitted electronically via the processing portal provided by UCAS.
- From Applications submitted electronically through our university web portal.
- From Applicants and Offer Holders via email.
- From authorised Student Recruitment Agents working on behalf of the University.
- From recognised overseas partners e.g. China Office.
- Occasional paper-based information received through the mail service.

What information are we collecting (whose information and what type of personal data)?

We will collect and hold some or all of the required information about you, if you apply to study with us including:

- Personal and contact information e.g. names, addresses, email addresses and telephone numbers; and may also include images in photographs or films.
- Family member (parent/trusted contact/nominated contact), sponsor, funder, name and contact details where relevant.
- Education details, student records including examination certificates, transcripts and references.
- Any relevant employment details.
- Financial information to verify your eligibility for fees and financial support.
- Nationality.

We may also need to process information, where necessary, which may be considered sensitive and is known as special categories of data, including:

- To meet a legal obligation such as immigration law or health and safety law.
- To monitor our compliance with equality law.
- To accommodate a special need you have disclosed to use such as dietary requirements or a disability.

We may ask you to declare:

- Religious or other similar beliefs
- Racial or ethnic origin
- Sexual life, sexual orientation
- Physical or mental health details
- Alleged offences and offences
- *Criminal proceedings, sentences or outcomes you are expected to declare

What is the legal basis for processing?

The following are our legal bases for processing non-special category personal data:

Article 6(1)(b) – Necessary in order to take steps at the request of the data subject (prior to entering into a contract or, in this case, making an application to the University), including corresponding with you about your application and keeping you informed of further information related to your application to the University.

Article 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of the official authority vested in the controller, namely the University's Statutory Instruments: "for the objects of providing education, carrying out research, and promoting teaching, research and general scholarship", "to do anything incidental … to the furtherance of the objects of the University" and the administration and support thereof.

Article 6(1)(c) – The University is required to comply with legislation and statutory obligations e.g. Student funding bodies, UK Visas and Immigration Service, and other government bodies and agencies.

Article 6(1)(a) – Consent. We will only email you about our events and services *unrelated* to any previous enquiries from yourself, or call telephone preference service (TPS) registered numbers, if we have your consent to do so. We may send you post, unless you have asked us not to. Every communication from the University will contain a method to opt-out from receiving further information from us.

Special Category (sensitive personal data)

The following are our legal bases for processing special category personal data, such as health data, equality monitoring data, immigration and criminal convictions data, where necessary:

Article 9(2)(g) as permitted by DPA 18 Pt2(2)(s10)(3) and Schedule1 S.16 for the processing of special category (sensitive) personal data for the purposes of providing support to individuals with particular disabilities or medical conditions and DPA 18 Pt2(20(s10) and Schedule1 S.8 for the processing of equalities monitoring information to comply with the Equalities Act 2010.

Article 10 as permitted by DPA 18 Schedule 1 Parts 1 & 2 and Schedule 2 for the purposes of public safety, security and the prevention and detection of crime and fraud, etc. e.g. The Home Office UK Visas and Immigration Agency, courses which require a PVG check, etc. Please see the University Admissions Policies and Student Privacy Notice for more information.

Who can see your information within the University?

Your information can be accessed by staff employed through Edinburgh Napier University, including the Admissions Team, authorised student ambassadors, school support staff, academics, service colleagues and overseas offices, in order to administer your application. Direct applications from certain markets are processed by our team in India.

Who are we sharing your Personal Data with (externally)?

External parties which we may share your personal data with include:
- The Scottish Funding Council (SFC)
- Higher Education Statistics Agency (HESA)
- Student Awards Agency for Scotland (SAAS)
- Students Loans Company (SLC)
- UK Visas and Immigration (UKVI)
- Widening Access partners, where applicable
- Organisations sponsoring applicants or courses

- Edinburgh Napier University International College – A Joint Venture between Edinburgh Napier University and Oxford International Education Group.
- Other Universities or educational institutions
- Secure English Language Test providers for test verification purposes
- Third party operated social networks such as Meta

This list is not exhaustive.

How long is your information kept?

We will keep your information only for as long as we need it to provide you with the information or services you have required (notionally the current academic year + 1 year) to manage your contract with us, to comply with the law, or to ensure we do not communicate with you if you have asked us not to. When we no longer need information we will always dispose of it securely. Anonymised statistics may be retained for a longer period of time.

Once applicants have become students different retention periods apply to their personal data – please refer to the Student Privacy Notice for more information.

How secure is your information?

For services provided locally by Information Services, information is stored on servers located in secure University datacentres. These datacentres are resilient and feature access controls, environmental monitoring, backup power supplies, etc.. Information on these servers is backed up regularly. The University has various data protection and information security policies and procedures to ensure that appropriate organisational and technical measures are in place to protect the privacy or your personal data.

The University makes use of a number of third party, including "cloud", services for information storage and processing. Through procurement and contract management procedures the University ensures that these services have appropriate organisational and technical measures to comply with data protection legislation.

Please note we use the following secure 3rd party service to process your data.
- University and Colleges Admissions Service (UCAS)

Who keeps your information updated?

You have the right to update your own information at any time by notifying the Admissions Team of any changes to your personal data. You can write to us at
Admissions Team, Edinburgh Napier University, Sighthill Campus, Sighthill Court, Edinburgh EH11 4BN or emailing us at: ugadmissions@napier.ac.uk or pgadmissions@napier.ac.uk
You can also contact UCAS about the use of personal information at
datagovernance@ucas.ac.uk, or write to: Data Protection Officer, UCAS, Rosehill, Cheltenham, Gloucestershire, GL52 3LZ.

You can update your marketing preferences on your social media account or by updating your Cookie preferences on our website (there is a link at the bottom left of the homepage: www.napier.ac.uk).

Will your information be used for any automated decision making or profiling?

No.

Is information transferred to a third country? Outside the EEA and not included in the adequate countries list.

Only where the University deals with applications made from countries outside the UK, EEA/adequate countries list.

Is any other information available?

You can access all the University's privacy notices using the following link: https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/statement.aspx

You have a number of rights available to you with regards to what personal data of yours is held by the University and how it is processed – to find out more about your rights, how to make a request and who to contact if you have any further queries about Data Protection please see the information online using the following URL: https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/default.aspx

*Criminal Convictions details are currently requested for subject areas that require PVGs through Disclosure Scotland. More information is available in the University's Policy for Applicants with Declared Criminal Convictions: https://www.napier.ac.uk/study-with-us/undergraduate/how-to-apply/application-advice-and-support