



Name of Process: Promotion of University courses to Students who have registered for College Board Student Search Services

*Data Controller	Edinburgh Napier University
*Purposes for collection/processing	The University is a registered institution with College Board, a US organisation which provides a service to match students (US and worldwide) to Universities and Colleges which align to their (students') interests and requirements, or to match students directly with institutions they have specifically indicated an interest in. This enables the University to process student data, for the purposes of promoting Edinburgh Napier University as a place of study and providing students with further information in order for them to make informed choices about the next step in their studies.
	College Board provides Edinburgh Napier University with matched student personal data in order for the University to connect with those students.
	College Board is a mission-driven not-for-profit organisation that connects students to college success and opportunity. Founded in 1900, College Board was created to expand access to higher education. Today, the membership association is made up of over 6,000 of the world's leading educational institutions and is dedicated to promoting excellence and equity in education. Each year, College Board helps more than seven million students prepare for a successful transition to college through programs and services in college readiness and college success—including the SAT, the Advanced Placement Program, and BigFuture. The organisation also serves the education community through research and advocacy on behalf of students, educators, and schools.
	The University pays a license fee to College Board to use student information. College Board uses these license fees to help support its mission-driven work. The University only uses your personal data for the purpose of sending you information about opportunities we provide. We do not share your information with others except contractors such as direct mail service providers, and we may only keep your information for a limited time unless you become a student.
*Legal basis	The legal basis the University relies on is UK GDPR Article 6(1)(e): 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 <u>Statutory Instruments</u> : "for the objects of providing education, carrying out research, and <i>promoting</i> teaching, research and general scholarship" and the administration thereof.
	Where transferred data includes special category personal data the University relies on Article 9(2)(g) public interest as

	provided for in the Data Protection Act Schedule 1 Part 2 Section 6 as allowed by the University's Statutory Instrument, as noted above.
Whose information is being collected?	Students who have signed up to use College Board services. The University does not include personal data from individuals under the age of 13, and College Board endeavours not to collect personally identifiable information from this group: https://privacy.collegeboard.org/privacy-center/privacy-statement
What type/classes/fields of information are collected?	If you, as a Student, decide to opt in to the College Board voluntary Student Search Service ("Search"), College Board will share information about you that you provide to them (including without limitation your name, address, email, date of birth, the high school you attend, your expected graduation year, score ranges on SAT, AP, or PSAT 10 and PSAT/NMSQT tests, questionnaire responses, and information you provide on the College Board college planning website, BigFuture) with participating accredited colleges, universities, nonprofit scholarship programs, and nonprofit educational organisations. More information is available at http://studentsearch.collegeboard.org/ . College Board gives students the opportunity to choose
	what personally identifiable information they give us and how we share it. Students and families decide how much additional information they disclose beyond the information needed to register for tests and programs. They can also change their preferences whenever they choose.
	The University will use this information to send you (and your parent/guardian if they have opted in) email and postal mail informing you about our educational, financial aid, and scholarship opportunities. Being contacted by the University doesn't mean you have been admitted. You must apply to be considered for admission.
Who is the information being collected from?	College Board (https://www.collegeboard.org/)
How is the information being collected?	College Board collects personal data from a range of sources, including during account creation, registration for tests, and completion of questionnaires. Further information is available in the "Personally Identifiable Information Collected" here: https://privacy.collegeboard.org/privacy-center/privacy-statement
	Only a subset of this is made available to qualifying Education Organisations such as Edinburgh Napier University, where students have opted in to the Voluntary Student Search Service. The fields of information potentially shared are stated in this privacy notice above.
	Where information is shared, and collected by the University, this occurs via a secure online portal where the specific fields shared can be selected via filtering options.

*Who is personal data shared with internally and externally?	We only share this data externally with Campaign Master Advantage, an email software platform used for student recruitment. This is third party software hosted by Campaign Master (UK) Ltd on behalf of International Operations and Student Recruitment, and in accordance with data protection law.
How secure is the information?	The information was gathered from College Board's secure portal and is stored on the University's SharePoint. Files containing the data are also password protected.
Who keeps the information updated?	Once it is stored in our systems, relevant staff will update student information as required.
*How long is the information kept for?	The University will be a Data Controller for the information, which means obligations are placed on us to destroy it when appropriate: 1) If a lead becomes a student, their records will become student records and a core record will be retained permanently (other data will be deleted 6 years after their studies cease). 2) We aim to destroy the personal data of leads who do not become students within AY + 1 (that is, one year after the end of the academic year in which their personal data is collected). If information is held in our CRM system this period may be slightly longer due to system restrictions; if this is the case, however, we will destroy this information as soon as possible after this period has elapsed.
*Will the data be used for any automated decision making?	No
*Is information transferred to a third country outside the UK?	No

^{*}This information is provided to supplement the University's main Privacy Notices and it is recommended that appropriate notices are reviewed to provide full information about how the University processes personal data.

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