



## CLC privacy notice

The General Data Protection Regulation (GDPR) requires that clear and transparent information is provided to individuals about the use(s) that will be made of their personal information:

*“The principle of transparency requires that any information and communication relating to the processing of those personal data be easily accessible and easy to understand, and that clear and plain language be used.” (GDPR Recital 39)*

To fulfil this obligation, we are employing a layered approach to privacy notices where a short form overview is provided as well as a full detailed privacy notice.

### Short form summary privacy notice

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Here is a short summary of how the personal information you submit for the purpose of registering with the CLC will be held and used:

- Personal information will be used for the purpose of the registration process
- The Data Controller of the personal information you submit will be City of London College (CLC).
- The legal basis for processing your personal information is to comply with the CLC’s legal obligations and in the performance of a public task.
- It will be stored on secure servers within the UK or the EEA.
- It will not be routinely shared with any other organisations except where described in the full privacy notice.
- Personal information will be subject to the retention schedule.
- You have certain rights in relation to your personal information.
- You may contact our Data Protection Officer ([dpo@clc-london.ac.uk](mailto:dpo@clc-london.ac.uk)) with any queries or concerns you have about the use of your personal information.

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## Full privacy notice

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This full privacy notice explains in more detail how the personal information you submit for the purpose of registering with the CLC will be held and used:

### 1. Introduction

Centre for Advanced Studies Ltd trading as City of London College (“CLC”) established in 1979, enjoys a long tradition of providing high quality, relevant higher education provision, promoting its expectation to be a leading provider of national and international academic, vocational and professional education opportunities.

#### Applicant database

CLC is required to store and process data including conditions of applications. To apply, applicants will have to demonstrate that they satisfy the entry requirements of the programme of study chosen.

#### Assessing applications:

All applicants applying to enrol with CLC will need to complete an online application form which requests information which will be used to assess the applicant’s application for enrolment. The application form collects information such as personal, contact information and sensitive personal data (racial or ethnic origin, religious beliefs, physical or mental health, sexual life).

These details will not be published but they will be held on a central CLC database.

The CLC is committed to protecting your personal information and being clear about what information we hold about you and how we use it. This privacy notice tells you what to expect when the CLC collects personal information.

The CLC is registered as a data controller with the Information Commissioner’s Office (ICO). Our registration number is Z8246103 and you can check our entry details on the ICO’s website: <https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>

### 2. Data controller and Data Protection Officer

CLC is the “data controller” of any personal information collected within scope of this privacy notice. Our location and contact details are below:

City of London College  
3 Boyd Street  
London |  
E1 1FQ

Tel: 020 7247 2177

Email: [dpo@clc-london.ac.uk](mailto:dpo@clc-london.ac.uk)

Our Data Protection Officer (DPO) is the first point of contact for people whose information is processed. Contact details for our DPO are as follows:

Dr Shahzad Yousuf  
City of London College  
3 Boyd Street  
London |  
E1 1FQ

Email: [s.yousuf@clc-london.ac.uk](mailto:s.yousuf@clc-london.ac.uk)

Tel: 020 7247 2177

### **3. How we will use your information**

We can only use your personal information where we have legitimate reasons for doing so and have told you what those reasons are.

CLC needs to process certain information about its staff, students and other individuals with whom it has a relationship for various purposes such as, but not limited to:

1. Student enrolment.
2. Administration of programmes of study and courses.
3. Examinations and external accreditation.
4. Recording student progress, attendance and conduct.
5. The recruitment and payroll of staff.
6. Collection of fees.
7. Complying with legal obligations to funding bodies and government including local government.

If we want to use your personal information for a reason other than those purposes set out above, we will tell you before we start that use and provide further information about the new purpose(s).

### **4. Legal basis for using your personal information**

Under data protection legislation, we require a legal basis to be able to process your personal information for the purposes set out above.

In this case, the legal basis is:

- Article 6(1)(a) the data subject has given consent to the processing of his or her personal

data for one or more specific purposes;

- Article 6(1)(c) – processing is necessary for compliance with a legal obligation to which the controller is subject.

## 5. What personal information we will collect

We may Process the following categories of Personal Information about you:

*Personal details:* your name; username or log in details; password; areas or topics of interest; and photograph (if you or another user posts a photo on the Service).

*Demographic information:* gender; age/date of birth; nationality; salutation; job title, company information, education, work experience and other professional information; and language preferences.

*Contact details:* postal address; telephone and/or mobile number; email address; and your public social media handles or profile(s).

*Education details:* Qualifications attained, academic transcripts, examination marks

*Consent records:* records of any consents you may have given, together with the date and time, means of consent and any related information (e.g., the subject matter of the consent).

*Payment details:* records of purchases and prices; invoice records; payment records; billing address; payment method; payment amount; and payment date.

*Employment details:* contact information of your employer (including name, address, telephone number and email address) to the extent relevant.

*Views and opinions:* any views and opinions that you or other users choose to send to us, or publicly post about us on social media platforms or in the Services, including on forums.

All individuals whose details have been included in this section of the application form have consented in writing to our holding and processing their personal data for the purpose of applying to the College, and that a copy of that consent will be provided on request.

## 6. Who we give your personal information to

Where necessary or required we may share personal information to some other organisations for specific reasons, including:

- *Government departments or other public sector bodies*

We would only pass on personal information about individuals in exceptional circumstances if required to complete the funding process.

Where personal information is disclosed routinely to another organisation, a contractual agreement will be in place with that third party to ensure the protection of your personal

information and to ensure it is only used for the reasons described above.

We will not disclose your information to any other organisation other than those listed except where required to do so as part of our functions or by law.

### 7. Where your personal information will be stored

Your personal information will be stored securely within the United Kingdom or within the European Economic Area (EEA) and will not be transferred outside that territory unless required by a court order.

### 8. How do we protect your personal information

The CLC has a number of security measures in place to protect your personal information, listed below:

- All staff are required to undertake training in data protection and information security on joining CLC and then on an annual basis;
- Formal information security policies that must be read and understood by all staff;
- Personal information is only available to those members of staff who require access as part of their role.

### 9. Your rights over your personal information

Once your personal information has been collected, you have certain rights in relation to that personal information that may be exercised. You have the right to request:

- **The Right to lodge a complaint with a Supervisory Authority** - If you think there has been a breach of the General Data Protection Regulations you have the right to lodge a complaint with a supervisory authority, of the country in which you are resident, studying or working. The details of the Lead Supervisory Authority is detailed below;
- **Right to Erasure (Right to be Forgotten)** - You have the right to have the Personal Data we hold about you erased without undue delay;
- **Right to object** - You have the right to object at any time to the processing of your Personal Data. To object to or opt out of any data processing or data sharing by the College please e-mail the Data Protection Officer at [dpo@clc-london.ac.uk](mailto:dpo@clc-london.ac.uk). The College will consider your request however, it may not always be possible to facilitate such a request. The College is required by law to collect and process some Personal Data and it may not be possible for you to continue as a student of the College, if the College ceased processing certain data, as we would not be able to carry out our educational purpose.
- **Right to withdraw Consent** - Where consent forms are the basis for processing, you have the right to withdraw your consent to the processing at any time.
- **Right to Data Portability** - If you request us to we will transmit your Personal Data directly to another organisation.
- **Right to Rectification** - you have the right to ask us to rectify inaccurate information held about you without undue delay.

All these rights have certain limitations depending on the request and the purpose for which we

are holding your personal information. Further information can be found about these rights and our processes for handling such requests please refer to the College's Code of practice 2(Access to personal data by subjects)

#### **10. How long we will hold your personal information**

We are only able to retain a copy of your personal information as long as it is still needed for the purpose(s) for which it was collected. Please refer to the data retention schedule to find out more.

#### **11. Use of cookies on CLC website**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to complete statistical reports on website activity. For further information about our cookies visit: <https://www.clc-london.ac.uk/cookie-policy/> or for further general information visit: [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### **12. Complaints about the use of your personal information**

If you are unhappy with the way in which your personal information has been handled by CLC, please either contact us at: [dpo@clc-london.ac.uk](mailto:dpo@clc-london.ac.uk) or via our Data Protection Officer (details in section 2) and we will try to resolve your issue informally.

If we are not able to resolve the issue to your satisfaction, you can also make a complaint to the data protection supervisory authority. In the UK, this is the Information Commissioner's Office (ICO) and they can be contacted at:

Information Commissioner's Office Wycliffe  
House  
Water Lane Wilmslow  
Cheshire SK9 5AF

Tel: 0303 123 1113

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

#### **13. Changes to this notice**

Any changes we may make to our Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Policy.

This privacy notice was last updated on 02 May 2019.