

University of Hull Online

Privacy Notice

The University of Hull ('UoH') have contracted with Cambridge Education Group ('CEG') to deliver a portfolio of part-time online Master's programmes commencing in September 2019.

This Notice sets out how the University and CEG will process any personal data held for the purposes of delivering these courses. Both organisations will be data controllers over data that you provide.

Further information can be found in any section marked 'More information' within this Notice.

If you have any questions regarding this Notice, or want to contact either organisation directly please contact the University of Hull's **Data Protection Officer** ("DPO") **dataprotection@hull.ac.uk** or University of Hull, Cottingham Road, Hull HU7 6RX

CEG Digital's **Data Protection Officer** ("DPO") has oversight over data protection matters for CEG Digital. If you have any questions about this Notice, or any queries or comments on the processing described in this Notice, you can contact the DPO DPO@ceg-uk.com or Data Protection Officer, Cambridge Education Group, Kett House, Station Road, Cambridge CB1 2JH

Privacy Notice Contents

Contents

1. Introduction	3
(a) What is this Notice?	3
(b) What is data protection?	3
(c) Using this Notice	4
(d) Legal basis for processing of your data	4
2. When and how we collect your data	6
Data categories collected by UoH.....	6
Data categories collected by CEG	6
When and how CEG collect your data	6
3. How CEG hold your data	7
4. How and why both organisations process your data.....	8
(a) Enquiries;	8

(c) If you are offered a place;	9
(d) If you accept a place	9
5. Retention.....	10
6. Your rights as a data subject and how to exercise them	11

1. Introduction

(a) What is this Notice?

This Notice is relevant to those applying for an online Master's course with the University of Hull (UoH). This includes any person who has accepted an offer to study at Hull and those who have made an initial enquiry. As we hold information in a form that identifies individuals, it is "personal data" often referred to as "data" in this Notice.

In this Notice the two separate data controllers will be identified as the University of Hull (UoH) and Cambridge Education Group (CEG)

More information: The purpose of this Notice is to enable you to understand the scope of the personal data which both organisations collect, hold and use that relates to you personally, and how this data will be handled by them.

Both the UoH and CEG think it is important you know how we use your data. In addition, the data protection laws require us to be transparent about how we process your data, and they set legal requirements to give you specific information. Because of this, this Notice is quite long and it contains some technical legal language. We have tried to make the Notice as clear as possible and provide useful signposting so that you can find the information most relevant to you.

(b) What is data protection?

Personal data is information relating to identifiable living individuals (known as "data subjects"). Use of personal data (including collecting data, sharing data or just holding it in files) is referred to as "data processing".

In order to protect your privacy, organisations do not have complete freedom in how they use your data. They have to comply with data protection laws, which apply restrictions on when and how personal data can be processed. Processing of personal data is lawful only where it meets certain requirements or conditions which relate to the purpose of the processing and how it is carried out.

More information: Privacy legislation is set out in the EU General Data Protection Regulation (called “GDPR”) and a new UK law, the Data Protection Act 2018. Under these laws both the UoH and CEG are the data controller of the information it collects and processes as described in this Notice. This means that they have a legal responsibility to safeguard the information and ensure it is processed lawfully.

The UoH and CEG will:

- Take steps to ensure that the data it processes is accurate and up to date;
- Give you clear information about its processing of your data, in one or more Privacy Notices like this one;
- Only process your data for specific purposes described to you in a Privacy Notice, and only share your data with third parties as provided for in a Privacy Notice; and
- Keep your data secure.

(c) Using this Notice




In these sections, against each description of a data processing or sharing activity you will see a summary description of the processing and a colour-coded indicator of the legal basis of the processing (these are explained below). This first level of information will also include any specific processing activities which we particularly need to highlight to you. You can then choose whether to read the “More Information” text, which gives a more detailed layer of information about the processing and its legal basis.

(d) Legal basis for processing of your data

In order to process your data UoH and CEG need a legal basis (or bases) to do so, these are explained below.

Both organisations use colour coding to provide a quick, easily-accessible indication of the legal basis for processing. This box explains how the colour coding in this Notice links to the conditions set out in the GDPR: references to Articles are to the relevant provisions within the GDPR. Further information about the basis of a specific category of processing can usually be obtained by reading the “More Information” text within this Notice.

University of Hull Online lawful basis for processing

	<p><u>CEG will rely on: Necessary for the performance of a contract or to take steps (at your request) prior to entering into a contract:</u> this means that CEG needs the data in order to process your enquiry, to process your application and admissions and to provide a specific service requested by you.</p>
	<p><u>CEG will rely on the Consent of the data subject:</u> this means that you have agreed that we can use your data for this specific purpose. CEG will ask for consent where it is processing particularly sensitive personal data (for example about your health) and where it is processing personal data for marketing purposes. You are able to withdraw your consent at any time. When you are asked for consent, you will also be given details of who to contact to withdraw your consent.</p>
	<p><u>The UoH will rely on: Necessary for the performance of a task carried out in the public interest:</u> this would usually be an activity within UoH's core purpose as a statutory higher education corporation, to deliver higher education and carry out research, but might refer to a public interest task pursued by another organisation [Art 6.1(e)]</p>

In addition, both organisations can only process information about any **criminal convictions** you may have where this is in the substantial public interest and falls within a relevant description of processing set out in Schedule 1 of the Data Protection Act 2018. The UoH will process **criminal conviction** data by virtue of Sections 6(1)(e), Section 10 and Section 18 GDPR.

2. When and how we collect your data

The Information we collect and generate about you includes:

- Collected from you: through your original application to University of Hull
- Collected from the information you have provided within an enquiry or an application form
- Collected from you through your time studying with the UoH

Data categories collected by UoH

- Contact and identification information and personal characteristics
- Your name, and contact information such as address, email address and telephone number, as well as your date of birth, your passport number or national identity card details, country of domicile, your nationality and details regarding your next of kin. We will also allocate you a unique student number;
- Any other data you provide us when completing the enquiry form, application form or online enrolment. The UoH will also process data you provide during the course of study.

Data categories collected by CEG

- Your name, and contact information such as address, email address and telephone number, as well as your date of birth,
- Contact and identification information and personal characteristics
- Any other data you provide us when completing the enquiry form

When and how CEG collect your data

- We will use a third party CRM system called Hubspot to collect personal data, this data will be collected when the enquiry form is completed.
- We will collect financial data from you in relation to the payment of fees, this information will be stored by a third party provider Zoho Invoice.
- We will collect information that you provide, directly to us, through your student journey.

Hull will only access information in these systems where this is required for the purposes of their role within UoH and to fulfil our contract with you.

3. How CEG hold your data

Hubspot

Hubspot is CEG's marketing and sales Customer Relationship Manager (CRM). CEG use Hubspot to manage its inbound marketing, sales pipelines and customer information. In simple terms this means that Hubspot provides tools that help CEG with blogging, SEO, social media, email, landing pages, marketing automation, and web analytics.

As well as inbound marketing CEG uses Hubspot to record customer information. For example if a customer approaches CEG enquiring about a course they will record the data provided by the customer in Hubspot such as your name, and contact information already mentioned above.

Hubspot integrates with CEG's Invoicing software Zoho Invoice.

Zoho Invoice

Zoho Invoice is a finance and accounting system which CEG uses to bill its customers for the courses they purchase and manage the payment schedules. Data is passed from Hubspot to Zoho Invoice using Zoho Creator Cloud as middleware. All data is passed securely using Hypertext Transfer Protocol Secure (HTTPS). HTTPS is used for secure communication over a computer network, and is widely used on the Internet and encrypted.

Canvas

Canvas is a Virtual Learning Environment (VLE) where UoH and CEG build, administer and run all their courses. In simple terms Canvas is a Web-based platform for online study.

Canvas presents resources, activities and interactions within a course structure and provides all the administration necessary for assessment.

Canvas stores data such as your name, and contact information already mentioned above. Canvas also reports on student participation such as the amount of time spent on a particular part of the course.

4. How and why both organisations process your data

This part of the Notice is divided into the following sections which deal with different aspects of data processing within Hull Online:

(a) Enquiries;

How UoH process your data in relation to enquiries:

The data we process for these purposes is provided by you when you make your enquiry. It will include your name and contact details and information about you. This data is used to respond to your enquiry. It is also used for analysis. ●

● Necessary for performance of UoH's core public task, i.e. delivery of higher education and research

We will keep details of you and your enquiry in accordance with our Data Retention Policy. This is to help us respond more effectively to any further enquiries you make of UoH in the future, and to carry out analysis as described below. Where you later make an application to study at UoH, within our records we will link this additional information and the outcome of your application to your original enquiry details so that we can analyse the links between enquiries, applications and successful applications.

How CEG process your data in relation to enquiries

CEG will collate your data via the online platform and this data will be stored within the Hubspot system. CEG will then use the information you have provided to contact you regarding an application to UoH

● **Necessary for the performance of a contract:** this means that CEG needs the data in order to process your enquiry, to process your application and admissions and to provide a specific service requested by you.

● **Consent of the data subject:** this means that you have agreed that we can use your data for this specific purpose relating to particularly sensitive data or for marketing purposes.

How UoH process your data in relation to applications and admissions

The data will be managed by The University of Hull's Admissions teams and will also be accessed by relevant individuals working for Hull Online.

Where your application form remains incomplete, you will be contacted by a member of Hull Online to see if you need any assistance with your application.

Necessary for performance of UoH's core public task, i.e. delivery of higher education and research.

How CEG process your data in relation to applications and admissions

CEG will hold your financial information in relation to your application, this will be obtained when paying the deposit for the course. This data will be shared with a third party company Zoho.

When the payment has been received CEG will then share your data with the UoH to establish which students are ready to begin their course.

Necessary for the performance of a contract by CEG: this means that the data provided by you is required to enable CEG to process your application and complete the admissions process.

Consent of the data subject: this means that you have agreed that we can use your data for this specific purpose relating to particularly sensitive data or for marketing purposes.

(c) If you are offered a place;

How the UoH process your data if you are offered a place;

If you are offered a place for postgraduate study the University of Hull will send you an offer letter via email; CEG Digital will also be copied in to this email.

Necessary for performance of UoH's core public task, i.e. delivery of higher education and research

How CEG process your data if you are offered a place;

The UoH will send your offer letter via email CEG will be copied in to this email too.

Necessary for performance of a contract by CEG.

(d) If you accept a place

How the UoH will process your data if you accept a place

Once you have accepted an offer from UOH, we will begin to process your data in preparation for you enrolment on the online course and for a number of purposes which will continue through into your time as a student at UOH. Information about this processing is set out in our Student Privacy Notice

How CEG process your data if you are offered a place;

ENROLLED STUDENTS		
Purpose/Activity	Type of Data	Lawful basis for processing
To register you for our services as an enrolled student	Identity Contact Financial Transaction Special Category	Contract Consent
To provide you with ongoing services after enrolment including: (i) provision of core teaching and learning services (ii) administration including maintaining student records, processing fees (iii) providing services including IT and information services and other student support services (excluding welfare and medical)	Identity Contact Financial	Contract
To provide you with reports on your progress	Identity Contact	Contract
To process student complaints and grievances	Identity Contact Special Category	Legitimate interests (<i>It is in the interest of both parties for CEG to investigate and attempt to resolve complaints and grievances</i>) Consent
To carry out internal research and statistical analysis	Identity	Legitimate interests (<i>to monitor and evaluate the performance and effectiveness of our courses</i>)

5. Retention

(a) How long will your information be kept;

The UoH will retain your data in accordance with their Data Retention Policy and schedule.

CEG will retain your personal data in accordance with the Data Retention section of their Privacy Notice and their archiving policy.

<https://www.cambridgeeducationgroup.com/about-us/privacy-policy.htm#9>

6. Your rights as a data subject and how to exercise them

Under the data protection laws you have a number of rights in relation to our processing of your data. In summary these are:

- Right to request access to your data as processed by UoH and information about that processing (“Right to access”]
- Right to rectify any inaccuracies in your data
- Right to request erasure of your data from our systems and files
- Right to place restrictions on our processing of your data
- Right to object to our processing of your data
- Right to data portability: where we are processing data that you have provided to us, on the basis of consent or as necessary for the performance of a contract between us, you have the right to ask us to provide your data in an appropriate format to you or to another controller.

Most of these rights are subject to some exceptions or exemptions, depending on the purposes for which data is being processed.

If you have any questions or concerns about our processing of your data, please contact the respective organisations data protection contacts.

Both UoH and CEG will always aim to respond clearly and fully to any concerns you have about our processing and requests to exercise the rights set out above. However, as a data subject if you have concerns about our data processing or consider that we have failed to comply with the data protection legislation then you have the right to lodge a complaint with the data protection regulator, the Information Commissioner:

Online reporting: <https://ico.org.uk/concerns/>

Email: casework@ico.org.uk

Tel: 0303 123 1113

Post: Information Commissioner’s Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF