

# Student Applicant Privacy Policy

Holmes UK Holmes Limited (Holmes) is committed to protecting the privacy and security of your personal information.

In relation to your application to a Holmes International College, we process the data that you provide to us either via our online application form, or by other means, such as in application form(s) and equal opportunities form(s) which you complete, and any additional documentation which you provide to us. We may also process information relating to your application which is provided to us by third parties at your behest (for instance, referees).

The information which we process would typically include:

- Name, title, contact details, date of birth
- Application data, including your qualifications, your previous education and / or employment, references, and any criminal convictions (where required by your programme of study)
- Equal opportunities and widening participation data (which may include sensitive personal data such as health or disability information, ethnicity, care leavers, sexual orientation, religious beliefs, students from areas of low higher education participation and other student groups classified as disadvantaged by the Office for Students)
- Nationality, permanent residence, passport and immigration status
- Emergency contact details
- Correspondence
- Details of the programme / course you are applying for
- Event registration and attendance

We process personal data about you for the following reasons:

- To determine the suitability of your application for the programme / course for which you are applying, or for another programme / course
- To administer your application throughout the application and admissions process
- To create a record of your application
- To provide you with information regarding our facilities and services, and to provide you with communications relevant to becoming a Holmes International College student
- To compile statistics about applicants in general, and to report on them, for instance to the Higher Education Statistics Agency (HESA) (see HESA's data collection notice)
- To monitor equal opportunities and promote widening participation, including communicating the support available to students from under-represented groups. This data is not used in the selection process.
- Event administration and management.

We rely on the following legal bases for processing the data: public task (core or key tasks of universities), a contract with you the individual (including steps before entering into a contract), and compliance with legal obligations.

We do not use automated decision making (a process of computerised decision making) when determining the suitability of applications. This will only happen at a later stage if student applicants do not complete the full registration process, in which case their application would be withdrawn. All applicants will in every case be given several opportunities to complete the process.

Relevant Holmes employees will have access to your application data. We may also share data about you or your application, in some instances, with third parties.

Examples of this include:

- If we need to take up references which you have provided, or to ascertain the authenticity or accuracy of your application (e.g. from examining or awarding bodies);
- Where you have given us consent to discuss your application with a third party on your behalf;
- Where your application has been submitted via an accredited Holmes recruitment agent, we will share data with them about your application;
- If you are a full time undergraduate applicant who has applied direct to Holmes we will share details of your application with UCAS for reporting purposes and fulfilment of any contractual obligations we may have with UCAS;
- Where we are required by law or otherwise authorised under Data Protection legislation to share data on your application with official agencies or regulatory bodies (e.g. UK Visas and Immigration and other bodies with statutory powers or authority, and investigating authorities including the police and local authorities);
- Where programmes have been developed in collaboration with third party organisations and staff who are external to the Holmes have a role in the admissions selection process, we may share data with them as part of assessing your application, particularly our university partners;

- Where we use contractors to process personal data on our behalf under agreements which comply with Data Protection legislation;
- Examining or awarding bodies, to verify a qualification if necessary;
- To make you aware of events organised by Holmes which may be of interest and useful for you. We may communicate with you about these by email or post, or text to your mobile phone.

Data for applicants who do not become fully registered students at a Holmes International College will be held for two years after the end of the current academic year when the application was made. Exceptions will be where there is an over-riding requirement in law to keep certain data, or for public task reasons.

You have rights as a Data Subject. You can see more information about those rights on the Information Commissioner's website: <https://ico.org.uk/your-data-matters/your-right-to-get-copies-of-your-data/>

To reach the relevant responsible party for your data and its privacy, please contact: [hipadmissions@holmeseducation.group](mailto:hipadmissions@holmeseducation.group)

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