## Privacy Policy

Edinburgh Napier International College trading as Edinburgh is a division operated by Oxford International Education Group

Edinburgh Napier International College t/a Edinburgh Napier University International College (ENUIC) has written this Privacy Notice to explain how we keep your data safe and respect your privacy. Below you will find information explaining how we do this: what data we process about you, why we process that data and the legal bases for processing that data.

Edinburgh Napier International College t/a Edinburgh Napier University International College (ENUIC) is the data controller.c0 595.32 0.95 Tm0.188 g0.188 G 00

certain types of processing such as direct marketing.

Right to be Forgotten: Under certain circumstances, you can ask for the data we hold about you to be deleted from our systems.

Right to Rectification: If data we hold about you is inaccurate or incomplete, you have the right to correct or complete that data.

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
Your name, date of birth, gender, addresses, email addresses and phone numbers. Your relationship to the student*	To identify you to communicate with you	Fulfilment of a contract with you
	For marketing purposes	Where you have given us consent  Necessary for our legitimate
	For Debt collection purposes	

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
Your passport, BRP and visa details	To meet government immigration regulations	Compliance with a legal obligation
Bank account details*	To manage payments and refunds	Fulfilment of a contract with you
Your educational records and test or exam results from previous schools	To offst	

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
		discipline and debt collection)
Details of fees paid and any amount owed	To assist with debt collection	Necessary for our legitimate interest (to assist with the running of our school)
Details of your welfare such as how you are getting on at Edinburgh	To look after your wellbeing and meet government safeguarding regulations	Fulfilment of a contract with you
Napier University International College, safeguarding or child protection records and any problems or issues you may have had		Compliance with a legal obligation
Details of any behaviour issues or exclusions	To manage discipline in the schools	Necessary for our legitimate interests (to manage school discipline)
Images	For maintaining security	Necessary for our legitimate interest (for keeping our staff and students safe)
	For marketing our services	Where you have given us consent
		Necessary for our legitimate interest(to promote our

The data or	type	of data
we process		

The purpose of processing that data

The lawful bases for **27** m**3** of

Where we have obtained consent to use student data, this consent may be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

WHEN DO WE SHARE STUDENT, PARENT OR GUARDIAN DATA?

When it is legally necessary, or allowed under data protection law, we may need to share information about you with the organisations listed in the table below, for the listed reasons.

Organisation Name	The Reason for Sharing
Oxford International Education and Travel Ltd and other group companies	For our central teams (eg Finance, Marketing, HR) to manage student data on behalf of Edinburgh Napier International College Ltd

Organisation Name

The Reason for Sharing

Exam Boards

where applicable a copy of the standard data protection clauses that we have in place, by contacting us at <a href="mailto:protectingdata@oxfordinternational.com">protectingdata@oxfordinternational.com</a>

## STORING STUDENT, PARENT AND GUARDIAN DATA

We will keep personal information about you while you are an active student. We create and maintain records for each individual student. The information contained in these records is kept secure and is only used for purposes directly relevant to your position as a student with Oxford International. Once your time as a student with us has ended, we will retain these records and delete them in accordance with our Data Retention Policy.

## PRIVACY NOTICE FOR AGENTS

This privacy notice explains how we collect, store, and use personal data about agents. Edinburgh Napier International College t/as Edinburgh Napier University International College (ENUIC) is the data controller.

The table below shows the data that we process about agents and agencies, the reasons for processing this data and the lawful bases for processing this data.

The data or type of data we process

The purpose of processing that data

The lawful bases for processinssinpás & TEMENA

To communicate with you about students you have sent to Edinburgh Napier University International College (Edinburgh Napier International College Ltd);

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
	information to potential students	

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
agreements, payment records		

Where we have obtained consent to use agent data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

## WHEN DO WE SHARE AGENT DATA?

When it is legally necessary, or allowed under data protection law, we may need to share information about you with the organisations listed in the table below, for the listed reasons.

Organisation Name	The Reason for Sharing
Oxford International Education and Travel Ltd and other group companies	For internal reporting and auditing
The Department for Education	To provide data on international studnetss
Regulatory bodies, such as Ofsted or the British Council	to comply with regulatory inspections

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
Right to work information	To assess your eligibility for the role you have applied for	Compliance with a legal obligation
Pre-employment checks such as criminal record checks	A pre-employment check to assess your suitability for the role you have applied for	Compliance with a legal obligation; to fulfil regulatory checks
Salary, benefits and bonus information	For the purposes of making an offer of employment	To perform an employment contract with you, in the event you are successful

We may also collect data

The table below shows the data that we process about employee and agencies, the reasons for processing this data and the lawful bases for processing this data.

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
Name, date of birth, gender	To administer our relationship with you	Fulfilment of a contract with you
Telephone number, email address, postal address	To administer our relationship with you	Necessary for our legitimate interests (to manage the workforce)
Next of kin and emergency contact numbers	To contact family or close friends in the event of an emergency	To protect your vital interests
Bank account details, payroll records, National Insurance number, tax	To process salary payments	Fulfilment of a contract with you
status information, salary, annual leave, pension & benefits information, marital status	To provide tax and related data to HMRC	Compliance with a legal obligation
Recruitment information, including copies of right to work documentation, references and other	To administer the business	Necessary for our legitimate interests (recruitment)



The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
		Necessary for our legitimate interests (to promote our educational services and schools)
CCTV footage	For security management	Necessary for our legitimate interest (maintaining the security of the building)
Data about your use of the organisation's information and	To meet our safeguarding obligations	Compliance with a legal obligation
communications systems, including Internet use	To administer and protect the business	Necessary for our legitimate interests (to secure our buildings)
Criminal record information	To meet our safeguarding obligations	Compliance with a legal obligation
Medical and disability information	To administer our relationship with you (in relation to sick pay, occupational health, making reasonable	Fulfilment of a contract with you  Compliance with a legal obligation

The data or type of data we process

Organisation Name	The Reason for Sharing
	including seasonal programmes or conduct criminal record checks

If you have any questions, concerns or would like more information about anything mentioned in our privacy notices, please contact our Data Compliance Manager at <a href="mailto:protectingdata@oxfordinternational.com">protectingdata@oxfordinternational.com</a>,

Our Data Protection Officer can be contacted at <a href="mailto:dposupport@bulletproof.co.uk">dposupport@bulletproof.co.uk</a>.