

Written by	Barrie Mapp
Agreed by Directorate	January 2020
Date for Review	October 2020
Signed by - Company CEO	Rupert Braun

Introduction

Dusemond Study Programmes is committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate. Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

Your rights

As part of this policy you may have certain rights regarding your data. These include:

Right of Access: You have the right to a copy of all the data we hold for you.

Right to Object: You can object to the use of your data if it has or is causing alarm and distress. You can also object to the processing of your data in certain circumstances such as direct marketing.

Right to be Removed: You have the right, in certain circumstances to ask for your data to be removed from our systems. This may impact on services or employment dependent on statutory requirements.

Right to Amend: You can ask for your data to be rectified or amended if it is incorrect or incomplete.

Right to Restrict: In certain circumstances you can ask for a restriction to processing your data.

Right to Transfer: You can ask for your data to be moved or shared with another organisation or other interested parties.

There may be times where some or all of these rights do not apply, particularly in the case of statutory requirements where we are legally obliged to share, or hold data on you. For further information you can contact the companies Data Protection Officer.

Personal Data - General

We collect personal data for a number of purposes, including, recruitment, employment, welfare and sales and marketing. This policy will detail the data collected for each of these purposes, the reason for collection and the legal bases for the collection but as a general explanation:

'Personal Data' is information or pieces of information that could allow you to be identified, such as for example:

- Name and contact details (e.g. postal and email address, telephone number)
- Account information (e.g. user name, profile picture or social media account ID)
- Country of residence
- Birth date
- Technical information, e.g. screen/user name, IP address, browser and device data, information collected through cookies, pixel tags and other technologies, server log file data, app usage data and location data
- Preferences (e.g. shopping habits, preferred educational courses)
- Company or school name and address
- Credit and debit card number
- Medical condition (e.g. allergies or illness)

Complaints

We take any complaints received very seriously and will endeavour to investigate any suspected breach of data compliance and rectify the situation as soon as practicable. If you think our collection or use of your data is inappropriate, misleading or unfair, or have any concerns regarding our data collection then please contact us immediately at barrie@dusemond.co.uk

Alternatively you can raise a complaint via the Information Commissioner's Office (ICO) <https://ico.org.uk/make-a-complaint/> but we hope you will contact us directly in the first instance to investigate your issue.

Privacy Notice for Job Applicants

This privacy notice explains how we collect, process and use personal data of potential employees.

The table below details what, why and under which legal bases we collect data as part of our recruitment processes.

Data	Purpose	Legal Bases
Details that appear on CVs, supporting letter etc such as: name, address, date of birth, contact details, qualifications etc	To assess and progress your application as appropriate to the role applied for.	To enter into an employment contract with you in the event you are successful

Interview/ assessment notes	To assess your suitability for the role which you have applied for.	To allow recruitment decisions
References	To assess your suitability for the role which you have applied for.	To allow recruitment decisions
Right to work information	To assess your eligibility for the role which you have applied for.	To comply with legal obligations
Criminal Records Checks	To assess your suitability for the role which you have applied for.	To comply with legal obligations
Equal Opportunities information	To ensure a fair and transparent recruitment process	To comply with legal obligations

When do we share data on job applicants?

Sometimes it is legally necessary or allowed under data protection law to share data on job applicants. The below table shows the organisations and reasons.

Organisation	Reason
Regulatory bodies such as OfSted or British Council	To comply with inspections
Service Providers	For surveys or recruitment processes
Financial Organisations	For processing payments
Financial Auditors	For carrying out legal audits of company accounts
Professional advisors or consultants	To assist us in developing our business
Police forces, legal departments, courts or tribunals	For dealing with legal issues

Storing job applicant data

As a company, Dusemond Study Programmes will only keep information on you while you are an active applicant. We create an individual profile for each applicant and any information is kept securely and is only used in direct relevance to your position as applicant. We will retain your information in accordance with our Employee privacy notice, if after the application process you were successful. All other data will be deleted after 12 months.

Privacy Notice for Employees

This privacy notice explains how we collect, process and use personal data of employees. The table below details what, why and under which legal bases we collect data as part of our Human Resources process.

Data	Purpose	Legal Bases
Name, postal address and email address, telephone number	For administration	To enter into a contract with you
Date of birth, gender	For administration	Necessary for our legitimate interests (Workforce management)
Next of kin and emergency contact details	To contact family or friends in the event of an emergency	To protect your interests
Bank account details, payroll records, National Insurance number, tax status information, salary, annual leave	To process your salary arrangements and provide relevant information to HMRC	To enter into a contract with you Compliance with legal obligation
Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process	For administration and to uphold our safer recruitment obligations	Necessary for our legitimate interests (Recruitment) Compliance with legal obligation
Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships	For administration of our business interests	Necessary for our legitimate interests (Workforce management)
Performance information; outcomes of any disciplinary and/or grievance procedures; absence data	For administration of our business interests	Necessary for our legitimate interests (Workforce management) To enter into a contract with you

Images	For safeguarding, security and marketing	Compliance with legal obligation. Marketing images will only be used with your consent
CCTV footage	For security management	Compliance with legal obligation
Data from the organisation communications systems, including internet usage	To meet safeguarding obligations and protect business interests	Compliance with legal obligation
Criminal record details	To meet safeguarding obligations	Compliance with legal obligation
Medical information	To ensure we meet accrediting bodies requirements.	Necessary for our legitimate interests (To obtain accreditation)

When do we share data on employees?

Sometimes it is legally necessary or allowed under data protection law to share data on employees. The below table shows the organisations and reasons.

Organisation	Reason
Regulatory bodies such as OfSted or British Council	To comply with inspections
Service Providers	For surveys on behalf of the company or companies that provide transport, travel or excursion services, or venues used by the company that require criminal records information
Financial Organisations	For processing payments
Financial Auditors	For carrying out legal audits of company accounts
Professional advisors or consultants	To assist us in developing our business
Police forces, legal departments, courts or tribunals	For dealing with legal issues

Government departments	To meet our legal obligations on areas such as tax and social security
Other education providers	Where we have partnerships or use facilities
Security providers	Where DBS or equivalent checks are required
Other employers	For purposes of a reference where you have given consent for data to be shared.

Storing employee data

As a company, Dusemond Study Programmes will only keep information on you while you are an active or regular employee. We create and maintain an individual file for each employee. Any information is kept securely and is only used in direct relevance to your position. We will retain your information whilst employed with Dusemond Study Programmes but your data will be deleted after 12 months unless you express an interest in returning to work with us the following year.

Privacy Notice for Agents

This privacy notice explains how we collect, process and use personal data from agents and associated companies.

The table below details what, why and under which legal bases we collect data as part of our student recruitment.

Data	Purpose	Legal Bases
Name, address, email addresses, telephone numbers	For communication about students and products	Fulfilment of contract with you
Bank account details	To process payments	Fulfilment of contract with you
Joining information, references	To register your company with Dusemond Study Programmes	Necessary for shared business interests
Student details	To administer our business and manage student admissions	Fulfilment of contract with you
Images	For marketing reasons	Where consent has been obtained

CCTV footage	For security management if you have visited one of our centres	Compliance with legal obligation Necessary for legitimate business interests (Security Management)
Financial details, commission agreements, payment records	To make and receive payments between our businesses	Fulfilment of contract with you

When do we share data on agents.

Sometimes it is legally necessary or allowed under data protection law to share data on agents. The below table shows the organisations and reasons.

Organisation	Reason
Regulatory bodies such as OfSted or British Council	To comply with inspections
Service Providers	For surveys
Financial Organisations	For processing payments
Financial Auditors	For carrying out legal audits of company accounts
Health and Welfare organisations	To promote student wellbeing
Professional advisors or consultants	To assist us in developing our business
Police forces, legal departments, courts or tribunals	For dealing with legal issues

Storing agent data

As a company, Dusemond Study Programmes will only keep information on you while you are an active agent. We create an individual profile for each agency and any information is kept securely. It is only used in direct relevance to your position as an agent. We will retain your information in accordance with our Agent privacy notice, if you no longer work with us as an agent then your data will be deleted after 12 months.

Privacy Notice for Students, Parent and Guardians

This privacy notice explains how we collect, process and use personal data for students, parents and guardians. It is important to remember that some of this data collection may apply to more than one person.

The table below details what, why and under which legal bases we collect data as part of our student recruitment.

Data	Purpose	Legal Bases
Name, date of birth, address, email address, telephone number. Relationship to student	For communication about students and products	Fulfilment of contract with you Compliance with legal obligation
Nationality, ethnic background, special requirements or educational needs, disabilities	To provide appropriate information and support to students	Fulfilment of contract with you Compliance with legal obligation
Next of kin and emergency contacts	To contact family or friends in the event of an emergency	To protect your interests
Passport, BRP and visa details	To meet government immigration regulations	Compliance with legal obligation
Bank details	To manage payments	Fulfilment of contract with you Compliance with legal obligation
Academic test results	To manage academic progress	Fulfilment of contract with you
Medical information, including medication, allergies and dietary requirements	To help students manage their health whilst staying with Dusemond Study Programmes	Fulfilment of contract with you Compliance with legal obligation
Attendance records	To meet government immigration regulations and safeguarding responsibilities	Fulfilment of contract with you Compliance with legal obligation
Behaviour management records	To maintain school discipline	Necessary for our legitimate interests (to manage school discipline)

Welfare information, including cause for concern, child protection and safeguarding forms	To manage student wellbeing and government safeguarding regulations	Fulfilment of contract with you Compliance with legal obligation
Images	For marketing materials	Where consent has been obtained
CCTV footage	For safety management	Compliance with legal obligation Necessary for legitimate business interests (Security Management)
Data from the organisation communications systems, including internet usage	To meet safeguarding obligations and protect business interests	Compliance with legal obligation

When do we share data on students, parents and guardians.

Sometimes it is legally necessary or allowed under data protection law to share data on agents. The below table shows the organisations and reasons.

Organisation	Reason
Regulatory bodies such as Ofsted or British Council	To comply with inspections
Service Providers	For surveys. For providing taxi transfer or excursions. For security reasons
Financial Organisations	For processing payments
Financial Auditors	For carrying out legal audits of company accounts
Health and Welfare organisations	To promote student wellbeing
Professional advisors or consultants	To assist us in developing our business
Police forces, legal departments, courts or tribunals	For dealing with legal issues

Your parents or representatives	To provide information on academic progress of behaviour or attendance issues
Exam boards	To enter you for exams
Marketing services such as Facebook or Instagram	To develop further business from like minded students.

Storing student, parent and guardian data.

As a company, Dusemond Study Programmes will only keep information on you while you are an active student. We create and maintain an individual record for each student and any information is kept securely. It is only used in direct relevance to your position as a student. We will retain your information in accordance with our student privacy notice, which means your data will be deleted after 12 months.

Transferring data internationally

Your personal information may be stored and processed outside of the country where it is collected, including outside of the European Economic Area. Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

For any questions, concerns or if you would like any further information about our privacy policies then contact our Data Protection Officer at barrie@dusemond.co.uk