



**S P Jain
London School
of Management**

Privacy Notice for Students

This Privacy Notice explains how the SP Jain London School of Management collect, use, disclose and protect your personal data. It also sets out your rights in relation to this data.

All data is held and processed in line with data protection law and the School's Data Protection Policy which can be accessed here. All data which we receive from you or which is created while you are a student is kept securely and only used for legitimate purposes in connection with your education.

The data we collect

The School collects the following data:

- Personal details including contact details, date of birth, gender and ethnicity;
- Academic history before the School, including academic and/or professional references where required;
- Financial details for fee payments;
- Your academic record;
- Learning analytics data e.g. attendance records and how you access or use our resources (library, websites, virtual learning environments);
- Any records relating to student policies and procedure cases e.g. malpractice, disciplinary actions;
- Where relevant, information related to support provided to you or your mitigating circumstances;
- Information about your support needs e.g. disabilities and long-term medical conditions;
- Information related to the provision of IT services, such as IP addresses, usernames, email addresses and other network data.

How we collect your data

There are a number of collection points to obtain your information:

- When you make an application to become a student e.g. through UCAS or directly;
- When you register and re-register your details with SP Jain on an annual basis;
- The Student Loans Company, awarding bodies and if you apply for a Disabled Students' Allowance (DSA);
- If you are a student with SP Jain Global transferring or on a student exchange your information will be transferred to the School
- If you go on an exchange to SP Jain Global they will provide us with information on your performance and attendance
- Through services when you engage with the careers service;

- When you provide us with your financial information e.g. if you set up an online credit account;
- If you have declared a disability or long-term medical condition we will collect additional information about your specific support needs in order that we can make appropriate arrangements;
- Through the collection of learner analytics data such as your attendance and use of Blackboard;
- Our IT infrastructure collects information for the purposes of systems administration, required to provide you with digital services.

What we do with your data

The School processes your data for the following purposes:

- Managing your application to study with us;
- Managing your time with us a student (study and assessment);
- Carry out reporting and analysis on our student body to check and monitor our outcomes;
- Providing you wish services you request or require;
- Informing you of other courses and services available to you;
- Monitoring your interactions – where you appear to have disengaged with your studies, we may contact you and offer support.

The legal basis we use to process your data

The School has to have a legal basis for processing your data and relies on the following approach:

- Collecting the data is necessary for the ***performance of your contract*** with us as a registered student
- Where you access certain optional services we will ask for ***your consent***
- Holding records of your qualifications is necessary for the performance of a task carried out in the public interest or in ***the exercise of official authority*** vested in the controller
- Providing data to relevant statutory bodies such as the Higher Education Statistics Agency (HESA) is necessary for the ***performance of a task carried out in the public interest***
- Where you provide health information, for example to request special examination arrangements or raise accessibility issues we will rely on our responsibilities around the ***preventive or occupational medicine*** and ***assessment of working capacity***
- Where you provide equality and diversity information we will ask for your ***explicit consent*** and use it for ***statistical purposes in the public interest*** as part of our duties to monitor equalities information.

Please read our full list of all the **reasons for using your personal information**. This shows the legal basis that we use for processing your information.

How long we keep your data for

Your record of educational achievement and your alumni record will be retained permanently. More detailed records will be kept for a defined retention period, and only as long as is necessary:

- a) We will retain your academic work for as long as the time you have to make an academic appeal. When that time has passed we will securely dispose of it unless we require it for review by our regulator, the Office for Students.
- b) We will retain other data collected on you for appropriate periods based on risk and necessity.
- c) On graduation, or completion of your studies, you automatically become an alumni of the School and a member of our Alumni Network – there is a separate privacy notice for this purpose.
- d) If your application does not lead to registration, we will retain your record for three years and provide periodic information and reminders about other courses and study opportunities.

For further information please refer to SP Jain's [retention schedule](#).

Sharing your data with third parties

The School will share your information with the organisations that assist in the delivery and assessment of your studies.

If you go on an exchange with S P Jain Global School of Management we will share your personal details, your emergency contact details with them.

SP Jain will also share your personal data with the Student Loan Company and the Higher Education Statistics Agency (HESA). We are required to return important information, including your personal data to HESA. Please see [HESA's collection notice](#).

The School may use an external contractor or 'data processor' to store or manage its data. It will process this data only for purposes specified by the School and will be bound by contract to meeting the School's obligations under the General Data Protection Regulation. Where data is passed outside the EEA, the School will take the relevant steps to ensure there is adequate protection in place. This includes the S P Jain Global School of Management which provides academic and professional services for the School.

In emergency situations i.e. a life or death situation or where we consider it to be in your best interests, SP Jain may share your personal data, including sensitive personal data with organisations/individuals such as a medical professional or the police service.

Please see our full list of all the different [organisations that SP Jain may share your data with](#).

Your rights

You have a number of rights under the General Data Protection Regulation, such as the right of access to your data (the 'Subject Access Right'). If you wish to access your data you should contact the Registrar. Other rights are set out in the School's Data Protection Policy.

If you wish to complain about how we have used your data

Contact the Chief Operating Officer if you have any concerns or complaints about this Notice or about the way your personal data is being used.

If you are not happy with the way SP Jain has handled your concern or complaint then you may submit a complaint to the **Information Commissioner's Office**.

Reason and Legal basis for using your data

Marketing, Recruitment and Admissions

Number	Purpose	Legal Basis: GDPR (Article 6)
1.	Communicate to you as a prospective student in relation to your application to be a student at SP Jain.	Contract
2.	Sending you marketing information such as about our services, events and activities, including invites to applicant visit days and promotional emails which we think may be of interest to you as a prospective student.	Contract
3.	Correspond to you as an offer holder regarding the next steps in the application process. This may include a telephone call from a student ambassador.	Contract
4.	Processing of your application for study at SP Jain, including arranging an interview when appropriate.	Contract
5.	To use a range of information you provide us, including financial information, and about your immigration status, to determine your fee status.	Contract
6.	Information about any disability or long-term medical condition you have shared with us may be used: <ul style="list-style-type: none">- to determine the support you would require as a student of SP Jain- to consider any mitigating circumstances that we may need to consider as part of your application.	Contract
8.	To ask you to take part in a survey to provide us with information about your reasons for accepting or declining an offer at SP Jain.	Legitimate Interest

Pre-entry/Admissions

No	Purpose	Legal Basis
2.	As part of processing your application we will share with UCAS information regarding the status of your application, and any changes to the decision, including changes of course or year of entry. We may also share information with the UCAS Verification Team in relation to potential fraud and to share circumstances relating to exceptional requests for changes from applicants.	Contract
3.	If you are an International student we may share your information with one of our agents to make sure you get the support you need for applying to SP Jain.	Consent
5.	If you are interviewed as part of your application process we may share your information with external interviewers.	Contract

No	Purpose	Legal Basis
6.	To data processors such as Turnitin to identify any instances of collusion in relation to your application to SP Jain.	Contract

Administration of your student record

Number	Purpose	Legal Basis: GDPR (Article 6)
1.	Administration of your student record.	Contract
2.	The inclusion of photographic images on the student system for the production of your SP Jain ID card and within the student directory.	Contract
3.	The creation of your email address; kept within a global address book available to all staff and students.	Contract

Teaching and Assessment

Number	Purpose	Legal Basis: GDPR (Article 6)
1.	Teaching, monitoring progress and assessment on your course of study.	Public Task
2.	Provision of e-learning platforms as part of your programme of study.	Public Task
3.	The use of attendance data collected through learning analytics and other sources to help you succeed and enhance teaching and learning.	Contract
4.	The use of other learning analytics to help you succeed and enhance teaching and learning e.g. data regarding VLE and library system usage.	Contract
5.	To administer field trips, events and other activities for educational purposes as part of your course of study.	Public Task / Consent
6.	Administration of student-related policies and procedures including appeals, complaints, grievances, disciplinary matters, malpractice including plagiarism, fitness to study cases.	Contract
8.	If you have engaged with the disability service your Inclusive Learning Support Plan (ILSP) will be shared with academic departments and relevant staff in order that reasonable adjustments can be made.	Public Task
9.	Making arrangements, such as for reasonable adjustments, if you have declared a disability or long-term medical condition to us or if we need to consider mitigating circumstances.	Public Task / Consent
10.	The granting of your award (including the publication of awards and marks and inclusion in pass lists).	Public Task

Administration

No	Purpose	Legal Basis
1.	To IT providers delivering externally hosted IT services or products such as Microsoft.	Contract
2.	To the UK Visa and Immigration department in relation to International Students including as part of the process to obtain your CAS number.	Legal obligation
4.	To notify relevant organisations e.g. SLC if you withdraw or defer your studies.	Legal Obligation

Student Internships and exchanges

Number	Purpose	Legal Basis: GDPR (Article 6)
1.	The administration and management of your internships and student exchanges	Contract

Financial

Number	Purpose	Legal Basis: GDPR (Article 6)
1.	To make payments into your account as a result of bursaries, scholarships, subject awards, studentships, expenses and refunds.	Contract
2.	The administration of financial awards and prizes including scholarships and bursaries.	Consent
3.	The determination of financial aid, such as hardship funding and loans.	Consent
4.	To set up student stipends, fee waivers and allowances.	Consent
5.	Processing and recovery of fees including course and accommodation fees and for overseas vacation programmes.	Contract
6.	The administration of research funding which directly relates to your studies.	Contract

Wider support offered to you as a prospective student/ student at SP Jain

Number	Purpose	Legal Basis: GDPR (Article 6)
1.	The provision of services such as Careers, Financial advice, Counselling, IT and Library.	Contract
3.	Direct communications about student benefits, opportunities, activities and events offered by or through SP Jain.	Legitimate Interest
4.	To provide pastoral and spiritual support during your course of study at SP Jain.	Contract
5.	To administer trips, events and other activities for social and other purposes.	Consent

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| 6. | Making arrangements, if you have declared a disability or long-term medical condition to us, in order to make sure you receive the appropriate support. | Public Task |
| 7. | To assist with keeping you and your property safe and safeguarding SP Jain assets e.g. CCTV. | Legitimate Interest |
| 8. | The provision of immigration welfare services for international students, including applications for a visa and visa extensions. | Public Task/Consent |
| 9. | To contact you to inform you not to come to campus in the event of an emergency e.g. power cut, flood, etc. | Legitimate Interest |

Surveys/Statistical Returns/Feedback/Analysis

Number	Purpose	Legal Basis: GDPR (Article 6)
1.	Production of statistical returns required for government bodies e.g. the Higher Education Statistics Agency (HESA). Please see this link .	Public Task
2.	To gather information on your student experience so that we can improve the services offered to you.	Legitimate interest
3.	To facilitate the assessment and improvement of services that SP Jain offers, to assess the effective management of SP Jain and to ensure the efficient running of SP Jain via internal and external audit.	Public Task
4.	To assist in assessing the equality, diversity and inclusivity of SP Jain.	Public Task
5.	To facilitate the assessment and improvement of services that SP Jain offers and for future planning and analytics purposes	Legitimate Interest

Police and Emergency Situations

No	Purpose	Legal Basis
1.	To the police or other regulatory body where pursuant to the investigation or disclosure of a potential crime.	Public Task
2.	To close family, your emergency contact/s, next of kin and the emergency services when necessary to protect life of yourself or another person.	Vital Interest/Consent
3.	To SP Jain insurers in respect of accidents or incidents occurring with the institution and external auditors and regulators such as the Health and Safety Executive.	Legal Obligation
4.	Where deemed necessary, with appropriate agencies in order to fulfil SP Jain's obligations under the Prevent duty.	Legal Obligation