



Privacy Notice **UK and International Student Recruitment**

Edinburgh Napier University provides this information to explain how we use your personal data. Protecting your personal data is important to us and we only collect and process data which is necessary for us to provide the information, services and goods you require. This is in compliance with UK data protection legislation (“the legislation”), that is, the UK Data Protection Act 2018 (“DPA 2018”) and the General Data Protection Regulation: EU 2016-679 (“GDPR”) as amended by “EU Exit” Regulations 2019 and now known as the UK GDPR.

Who is collecting the information?

Edinburgh Napier University as the “Data Controller”.

Why are we collecting your personal data (purposes)?

We will use the details you have provided to contact you by post, email, telephone, short message service (SMS) or social media about your enquiry or application and other relevant recruitment initiatives or services, including:

- To respond to enquiries/queries from you
- To process and contact you about your application, including scholarship applications
- To promote our recruitment open days and events, as relevant to your application
- To promote other recruitment initiatives either on campus, online, throughout the UK or overseas, as relevant to your application
- To promote study opportunities, as relevant to your enquiry
- To register and administer your attendance at an event, such as an open day
- To send you marketing materials advertising additional opportunities, events, initiatives, etc. which are not specifically related to your enquiry, where you have given consent for us to do so. This may include creating custom audiences, where your data is matched by external providers to show you relevant ads on social networking sites, search engines or other platforms
- Statistical analysis and market intelligence

For more information about what we do and how we process your personal data when you apply to us, please see our Student Applicant Privacy Notice on our website by visiting: <https://www.napier.ac.uk/privacy-policy/privacy-notices>

How are we collecting this information?

We are collecting this information directly from enquirers/applicants in the following ways:

- Web forms on www.napier.ac.uk (enquiries, applications and events registration)
- Direct emails to the Student Recruitment or International Operations mailbox/email address
- Registrations for events and webinars, either hosted by the University or hosted by a third-party agent or event organiser
- Via tablets at events in an electronic format
- Via third party apps or systems provided by agents or event organisers which you have signed up to through their registration process
- Other direct applications e.g. paper format. These are then input into our electronic applications system for processing
- Social media enquiries
- Telephone enquiries

- Enquiries via our “Ask a Student” platform, provided via third party providers Unibuddy and UniCompare.

Where enquirers/applicants have provided information to a third party for transmission on to the University, we will collect that information from those third parties where:

- Applicants have applied through UCAS
- Applicants have applied through agents or partner institutions

What information are we collecting?

We may collect and process the following data about you when you apply to or participate in one of our courses, activities, events or webinars, or request other services:

- your name
- address and contact details, including postcode and phone number
- nationality
- information about the course/s, course start dates and
- events or other recruitment activities on or off campus that you are interested in.

If you submit an application, we may also need to hold personal data related to your:

- nationality and country of residence
- date of birth
- previous school/institution or organisation
- information relating to your past and future academic progress, educational or professional background,
- your communication preferences
- details of trusted contact/s (previously known as “emergency contacts”)
- information about health conditions
- ethnicity
- disabilities
- dietary requirements
- photocopies of your passport/visa
- financial information.

What is the legal basis for processing?

Depending on the purpose your data is used for, we will rely on one of the following conditions for processing: at your request (contract); official authority of the University; in the public interest; your consent to process your data, as explained below and detailed in Appendix A:

- UK-GDPR Article 6(1)(b) – Processing data as part of a contract or at the request of the data subject prior to entering into a contract.

We may process your data in order to provide further information on your original enquiry (including expression of interest, registration with us at an event and/or through a third party) or application, or to provide you with appropriate service messages e.g. to notify you of relevant open days and/or events and recruitment initiatives relevant to your enquiry or application to the university.

- UK-GDPR Article 6(1)(e) – Processing is necessary for the performance of the University’s official authority as vested in the Data Controller by Scottish Statutory Instruments 1993 No.557 (S.76) as amended, that is, providing education, carrying out research, and promoting teaching, research and general scholarship and other functions as required for the furtherance of the objects of the University and the administration and support thereof.

In circumstances where we are not relying on Article 6(1)(b) e.g. contacting you following an enquiry from you, or Article 6(1)(e), there may be circumstances where we ask for consent to contact you. Where this is the case, we rely on:

- UK-GDPR Article 6(1)(a) – Consent of the data subject
 - We will only email you about our events and services unrelated to any previous enquiries from yourself, or call telephone preference service (TPS) registered numbers, if we have your consent to do so. We may send you post, unless you have asked us not to. Every communication from the University will contain a method to opt-out from receiving further information from us.
 - Where we ask for your consent to use your personal data for custom audiences this is to enable us to share it with external parties in order for them to create custom audiences for us e.g. they will show our adverts to other users of their product who have similar characteristics to prospective students who enquire about our courses. Currently the providers we use have the necessary safeguards in place around the use of this information. For more information about this please see the Google and Meta section below.

Who are we sharing your Personal Data with?

Your data may be processed by the following services:

- Our Admissions service.
- Our academic and administrative departments involved in administering aspects of recruitment processes.
- Third parties who are acting as contractually authorised agents for the University for the purpose of student recruitment.
- Third party services which facilitate the collection of data, as described in the software section below and third party operated social networks such as Meta and Google.

How long is your information kept?

We will keep your information only for as long as we need it to provide you with information or services you have requested, as required to manage your relationship with us, to comply with the law, or to ensure we do not communicate with you after you have asked us not to. When we no longer need information, we will always dispose of it securely. (Anonymised statistics may be retained permanently). Currently information may be kept for up to 6 years depending on the purposes.

How secure is your information?

Edinburgh Napier University provides mandatory data protection training to all colleagues who have access to your information. Your data may be transferred to third party providers and held there e.g. when we contact you by email. We only use third party systems to store and process your data for which we have completed a risk assessment exercise to ensure your data is securely processed and the necessary safeguard are in place.

For services provided locally by Information Services, information is stored on servers located in secure University datacentres. These datacentres are resilient and feature access controls, environmental monitoring, backup power supplies, etc. Information on these servers is backed up regularly. The University has data protection and information security policies and procedures to ensure that appropriate organisational and technical measures are in place to protect the privacy of your personal data.

The security of third-party apps or systems provided by agents or event organisers with whom you have registered independently is the responsibility of those third parties who provide them, as the University is not providing these systems although we may also make use of them to facilitate processing your enquiry or registration with us.

Further information about the software/services we use to process your data:

- **CRM database**

The University's Enquiry Management System, Microsoft Dynamics CRM, is commissioned by Edinburgh Napier (Data Controller), hosted by a third-party provider Tribal Group in conjunction with the Microsoft Corporation. The University takes its obligations with your data very seriously and will ensure that all appropriate safeguards and security provisions are in place.
- **Gecko (data collection tool and call campaign software)**

Edinburgh Napier University (as the Data Controller) will use the information you have provided to send you details about University activities and events such as open days and course information, or to call you using our call campaign software. Your information will be held securely on a third-party application hosted by Gecko Labs on behalf of International Operations and Student Recruitment in accordance with the Data Protection Legislation. The application is used for the purposes of capturing and backing-up your contact data and for calling you as part of a call campaign if you have given your consent to be contacted. The application will not be used for any other purposes and your data will not be added to any third-party mailing list or shared with any other third parties, unless you have given us express consent. We will provide opt-out options in all communications we send to you.
- **Campaign Master Advantage (email tool)**

Edinburgh Napier University (as the Data Controller) will use the information you have provided to send you details about University activities and events such as open days and course information. Your information will be held securely on a third-party application hosted by Campaign Master Advantage on behalf of International Operations and Student Recruitment in accordance with the Data Protection Legislation. The application is used for the purposes of designing and distributing emails to you, as detailed in section '*Why are we collecting your personal data and what we are doing with it (purposes)?*' above.
- **Unibuddy**

Edinburgh Napier University (as the Data Controller) will use the information you have provided to send you details about University activities and events such as open days and course information. Your information will be held securely on a third-party application hosted by Unibuddy on behalf of International Operations and Student Recruitment in accordance with the Data Protection Legislation. The application is used for the purposes of capturing your contact data to allow peer-to-peer conversations to take place via the Unibuddy platform, and to provide you with details about University activities and events, if you have given your consent to be contacted. The application will not be used for any other purposes and your data will not be added to any third-party mailing list or shared with any other third parties, unless you have given us express consent. We will provide opt-out options in all communications we send to you.
- **UniCompare**

Edinburgh Napier University (as the Data Controller) will use the information you have provided to send you details about university activities and events such as open days and course information. Your information will be held securely on the University CRM database on behalf of Marketing and External Relations in accordance with the Data Protection Legislation. UniCompare is used for the purposes of capturing your contact data to allow Edinburgh Napier University to respond to your enquiries about the University, and to provide you with details about University activities and events,

if you have given your consent to be contacted. Your details will not be used for any other purposes and your data will not be added to any third-party mailing list or shared with any other third parties unless you have given us express consent. We will provide opt-out options in all communications we send to you.

- **Google and Meta**

Where you have consented, we will use the information you have provided to serve relevant advertisements and build audiences based on your subject and/or study level of interest. Your information is held securely on a third-party application on behalf of International Operations and Student Recruitment in accordance with the Data protection Legislation. Data is refreshed regularly to ensure you are no longer served ads if you opt-out. We use this application to provide relevant information regarding study opportunities and events, as mentioned in the 'Purposes' section above. (We use University email addresses provided to registered students to exclude them from certain marketing activities e.g. Google Customer Match).

Please note that the providers mentioned above may use data we share with them for the purposes of creating anonymised and aggregated data sets, which may be used for research and development and other commercial purposes.

Who keeps your information updated?

Please notify International Operations and Student Recruitment of any changes to your personal data using the details provided in communications to you, or by writing to International Operations and Student Recruitment, Edinburgh Napier University, Sighthill Campus, Sighthill Court, Edinburgh, EH11 4BN or studentrecruitment@napier.ac.uk.

International Operations and Student Recruitment staff may also update your data.

You have the right to update your own information at any time by unsubscribing from communications using the links within those communications from the University. Unsubscribing using the link within communications is the quickest and easiest way to unsubscribe, however, you can also do this by writing to the Student Recruitment team using the details above and using "Unsubscribe" as the subject of your request. Please note that it will take longer for your unsubscribe request to be processed if you write to the Student Recruitment team and therefore, we recommend that if you wish to unsubscribe you do so using the link provided in all communications from the University.

You can update your marketing preferences on your social media account or on the University website homepage (link at bottom left).

Will your information be used for any automated decision making?

No.

Is any other information available?

You can access all the University's privacy notices using the following link:

<https://www.napier.ac.uk/privacy-policy/privacy-notices>

You have a number of rights available to you with regards to what personal data of yours is held by the University and how it is processed, however these are conditional dependent on the legal basis used for processing – to find out more about your rights, how to make a request and who to contact if you have any further queries about Data Protection please see the information online using the following URL: <https://www.napier.ac.uk/privacy-policy/data-subject-rights>