

## **Student Recruitment and Marketing Privacy Notice 2025 - 2026**

This privacy notice covers activities organised by both the Student Application and Recruitment (StAR) and Marketing and Communications (MAC) teams, specifically in relation to applications and enquiries, and marketing events, such as open days and taster days, and sets out how we use your personal information and in particular what personal information we collect and:

- what we do with your personal information;
- the lawful basis on which we collect and use your personal information;
- how long we keep your personal information;
- how we share your personal information including whether we transfer your personal information outside of the European Economic Area (“EEA”); and
- your rights over your personal information.

This information is intended for school pupils, prospective students and applicants to the College, current students, teachers, parents, staff, higher education professionals and other interested parties who would like further information on how we process, store and use personal data.

Please note: once enrolled at the College, your data will be processed in a different way. Please see the College’s Student Privacy Statement for further details, available at <https://www.askham-bryan.ac.uk/publication-scheme-data-protection/> .

### **Information you give us**

#### **Applying to the College**

When you apply to the College, we will ask you for certain information to be able to process your application:

- Personal information (such as name, address, contact details, date of birth, gender, next of kin and unique student number);
- Details of your previous qualifications and educational history;
- Relevant medical information (so we can support you).

#### **Enquiries to the College**

We also collect limited information about you if you make an enquiry to the College so that we can respond to your enquiry:

- Personal information (such as name, address, email address, home or mobile phone number).

## Open Days, Taster Days or other marketing events

We also collect some basic details from you when you register an interest in either an open day or taster day or other marketing event.

## How is this collected?

Most of the information above is collected directly from yourself when you complete and submit application or, in the case of an enquiry to the College, or open day or taster day or other marketing event, when you submit that information to us using one of many forms available on the College website.

If you go on to apply to undergraduate or postgraduate programmes at the College, we may collect information relating to your higher education applications from third parties such as UCAS, Student Loans Company, etc

## Why we collect and use this information

We will use your personal information in the following circumstances:

1. where you have consented to us processing your data in order to provide you with specific information, or other services you have requested, for instance, to process your application or respond to your enquiry, and for administration purposes;
2. to contact you with information about the College, or provide you with information about the College and our activities and events that we feel may be relevant to you, unless you have objected to us doing so, as we believe this to be in our legitimate interests to do so and consistent with the nature of your enquiry and interest shown in the College.

Please note: where this is the case, you can opt out of these communications at any time by contacting the College at [enquiries@askham-bryan.ac.uk](mailto:enquiries@askham-bryan.ac.uk) .

3. to take photographs, audio and video footage at our events, activities, and programmes for use in the College's digital and printed promotional materials, communications, publications and social media sites.

We may also use your personal information in the following situations:

- where we need to comply with a legal obligation;
- where we need to protect your interests (or someone else's interests);
- where it is needed in the public interest or for official purposes.

**We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose.**

If, however, we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note: if you are under 13 years of age we will only process your personal information if we have parent/guardian consent to do so.

## The lawful basis on which we use this information

### Consent

Where you voluntarily provide us with your information, for instance, when you complete and submit an application form, or enquiry, to us, the lawful basis for that processing will be consent, as you made a conscious decision to provide us with that information.

Genuine consent is defined as “...any freely given, specific, informed and unambiguous indication of the Data Subject's [an individual's] agreement to the processing of Personal Data relating to him or her, such as by a written statement, including by electronic means, or an oral statement.”

For further details, please see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/consent/>

### Legitimate Interests

Where we have had previous contact with you, for instance, having submitted an application form or made an enquiry to us, or registered your interest for an open day or taster day or other marketing event, there may be things we would like to tell you about what the College has to offer, which we feel may be of interest to you.

The UK GDPR allows us to contact you in these circumstances, where we consider it in our and your legitimate interests to do so and where we use any information previously provided in a manner consistent with how it was provided to us originally, provided also that there is a minimal privacy impact to you in us doing so.

Where we have an existing relationship with you, and we have offered you the opportunity to opt out, but you have declined to do so, it may not be necessary to obtain fresh consent each and every time we interact with you. This is because there is an exception to the consent rule, known as the ‘soft opt-in’, provided you are an “existing customer”. This is based on the legitimate interest of the College to maintain a relationship with individuals who expressed a clear interest in one of our products or services and the expectation that having indicated an interest in the College, this is information you would like to or expect to receive from us. If you are an existing customer, we may therefore send you information about our products and services similar to those for which you expressed an interest.

If you are a student, or you have applied to be a student, information such as accommodation and post-offer open day invitations could help you to decide on student matters.

We will only use the contact information we have obtained over the course of our customer relationship with you.

For further information on “legitimate interests” please go to <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/>

## Performance of a contract

Having enrolled at the College, we may need to send you details about the services the College has available to you (service messages), to enhance and maximise your experience at the College, and where this is relevant to the contract between us.

**Please note: you can opt out and withdraw your consent to receive these communications at any time by simply contacting [enquiries@askham-bryan.ac.uk](mailto:enquiries@askham-bryan.ac.uk) and asking to update your contact preferences.**

## Social media

We will ask for your consent to send you direct marketing communications via social media.

If we engage with each other through social media, we may also collect information contained in your comments, likes, voting or private messaging functions from any of the social media sites used by the College (Facebook, Twitter, YouTube, Instagram, or LinkedIn).

**Please note: any personal information you choose to share on these sites could be accessed by the public worldwide.**

## How long we keep your information

When you apply to the College or complete one of our web forms to register your interest in one of our programmes, activities or events, or complete one of our web forms to request other services we provide (for instance: delivery of our prospectus, online enquiries, etc) we will retain your personal data based on the criteria below:

Student Recruitment		
Type of Data	Retention Period	Reason for retention
Application forms	2 months + 1 year for unsuccessful applicants; 10 years + 1 year for successful ones	Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students
Enrolment forms	6 years from completion of course + 1 year; six months from the date of the application for unsuccessful application	Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students
Student Interview Files	6 years from completion of course + 1 year	Legal obligation, performance of a contract, performance of a task in the public interest (provision of education) and College's legitimate interests including safeguarding of students

<b>Marketing and Communications</b>			
<b>Activity</b>	<b>Type of Data</b>	<b>Retention Period</b>	<b>Reason for retention</b>
<b>Alumni Data</b>	<b>Alumni communications</b>	Issue + 1 year	Consent and College's legitimate interests
<b>Alumni Data</b>	<b>Records containing personal data on individual alumnus</b>	For as long as the individual remains an alumnus + 1 year	Consent and College's legitimate interests
<b>Enquiries</b>	<b>Enquiries from members of the public, prospective students, etc and responses provided</b>	2 years + 1 year	College's legitimate interests
<b>Marketing – campaigns and promoting the College</b>	<b>Consent to audio/video recording/capture of images</b>	3 years from date of marketing event + 1 year	Consent, College's legitimate interests
<b>Marketing – campaigns and promoting the College</b>	<b>“Keep warm” campaigns</b>	2 months from date of campaign communication + 1 year	Consent, College's legitimate interests
<b>Marketing – campaigns and promoting the College</b>	<b>Open days/Open events</b>	3 years from date of Open Day/Open Event + 1 year	Consent, College's legitimate interests
<b>Marketing – campaigns and promoting the College</b>	<b>Photographs, audio recordings, and video recordings of marketing events</b>	5 years from date added to media library + 1 year	Consent, College's legitimate interests
<b>Marketing – campaigns and promoting the College</b>	<b>Taster days and Applicant Sessions</b>	3 years from date of Taster Day/Applicant Session + 1 year	Consent, College's legitimate interests
<b>Marketing – campaigns and promoting the College</b>	<b>Emails relating to any of the above categories or types of document</b>	As per the retention period for the type of document to which they relate. Otherwise, deleted when no longer required	Consent, College's legitimate interests

<b>Marketing – campaigns and promoting the College</b>	<b>Press Releases</b>	10 years + 1 year	College’s legitimate interests
<b>Marketing Strategy</b>	<b>Records documenting the development of the College’s Marketing Strategy: key records</b>	Superseded + 5 years	College’s legitimate interests
<b>Marketing Strategy</b>	<b>Records documenting the development of the College’s Marketing Strategy: working papers</b>	Issue of Strategy + 1 year	College’s legitimate interests
<b>Stakeholder Engagement</b>	<b>Records documenting the development of the College’s Stakeholder Engagement Strategy: key records</b>	Superseded + 5 years	College’s legitimate interests
<b>Stakeholder Engagement</b>	<b>Records documenting the development of the College’s Stakeholder Engagement Strategy: working papers</b>	Issue of Strategy + 1 year	College’s legitimate interests
<b>Surveys</b>	<b>Online Surveys</b>	5 years from date of survey + 1 year	Consent, College’s legitimate interests

## Back Ups

The College adopts the grandfather father son backup method.

All College hosted systems are backed up nightly to multiple locations including offsite in accordance with the below schedule, following GFS principles:

Every 1 day for 30 days

Every 1 month on last day of the month for 12 months

Every 1 year on last day of the year starting in January for 6 years

However, the same retention periods referred to above will apply.

## Opting out

If you decide to opt-out of or withdraw your consent to our marketing, we will no longer use your personal data for this purpose. If your personal data is not needed for any other purpose, we will delete the data without undue delay. For further details, the College’s Data Retention Policy is available at <https://www.askham-bryan.ac.uk/publication-scheme-data-protection/>

## Who we share this information with

We will only share your information where we have a legal basis to do so. For instance, by law, we have to share some information you provide with the OfS (information you may provide in your UCAS application and or on enrolment). In the case of marketing-related activities, this may include contractors and service providers who process personal data on our behalf to perform certain business-related functions, including Eventbrite (event management services) and Mailchimp (The Rocket Science Group LLC) (email services) and Salesforce/ProEngage (CRM database services).

Where you have applied to the College, we may also share your personal information with staff from the College's curriculum departments and support services.

## Transferring your personal data outside of Europe

Unless otherwise stated, your information will remain at all times within the UK and or European Economic Area ("EEA").

If we have to transfer your personal data outside the EEA, we will only do so where:

- the recipient or recipient country ensures an adequate level of protection for your personal data;
- the recipient or recipient country is subject to an approved certification scheme or code of conduct with binding and enforceable commitments which amount to appropriate safeguards for your personal data;
- we have put in appropriate safeguards with the recipient or recipient country to protect your personal data such as a data sharing agreement;
- the transfer is permitted by law; or
- you expressly consent to that transfer.

## Requesting access to your personal data

Under data protection legislation, you have the right to request access to the information we hold about you.

To make a request for your personal information contact, contact the College's Data Protection Officer, Judith Clapham, either by contacting Judith at [judith.clapham@askham-bryan.ac.uk](mailto:judith.clapham@askham-bryan.ac.uk) or at [DataProtection@askham-bryan.ac.uk](mailto:DataProtection@askham-bryan.ac.uk)

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance by contacting Judith Clapham, either at [judith.clapham@askham-bryan.ac.uk](mailto:judith.clapham@askham-bryan.ac.uk) or at [DataProtection@askham-bryan.ac.uk](mailto:DataProtection@askham-bryan.ac.uk).

Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## Complaints

If you are not satisfied with how the College has processed your personal data, or are not satisfied with how the College has responded to a request to exercise one or more of your data subject rights, as set out above, you have the right to make a complaint. In the first instance, this should be to the College; but you also then have the right to refer the complaint to the ICO if you are not satisfied with the College's response.

Please submit full details of your complaint to [enquiries@askham.bryan.ac.uk](mailto:enquiries@askham.bryan.ac.uk), as per the College's Complaints Policy which is available at <https://www.askham-bryan.ac.uk/publication-scheme-customer-services/>. Please use the Stage 2 Compliant form which is also available at <https://www.askham-bryan.ac.uk/publication-scheme-customer-services/>

In accordance with the College's Complaints Policy, all complaints will be acknowledged within 2 working days, and the College will endeavour to provide a response within 10 working days. If more time is needed to investigate your complaint and provide a response, we will let you know. If you are not satisfied with the College's response to your complaint, you have the right to appeal, and ultimately, the right to complain to the ICO.

Please note: although you may complain to the ICO at any time, the ICO is likely to ask you to exhaust the College's complaints process first, before it processes your complaint. Please see the ICO's website [www.ico.org.uk](http://www.ico.org.uk) for further details.

## Further information

If you would like to discuss anything in this privacy notice, please contact Judith Clapham, either at [judith.clapham@askham-bryan.ac.uk](mailto:judith.clapham@askham-bryan.ac.uk) or at [DataProtection@askham-bryan.ac.uk](mailto:DataProtection@askham-bryan.ac.uk)

The College is registered with the Information Commissioner's Office ("ICO"). The Registration Number is Z6170811. Renewal of the registration takes place annually on 22 January.

Please also see the Data Protection Policy which is available at <https://www.askham-bryan.ac.uk/publication-scheme-data-protection/>

## Last updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated 10<sup>th</sup> June 2026.