

## Purpose of this Notice

We, the Foundation for International Education (FIE) of 114 Cromwell Rd, Kensington, London, SW7 4ES, telephone number: +44 (0)20 7591 7750, are the data controller for personal data relating to you that we process. “Processing” means any operation which we carry out on your personal data e.g. collating, storing, using, sharing, deleting.

This notice explains how we will process your personal data. The current version of this Notice can be found [here](#).

“Personal data” refers to information relating to a living, identifiable individual. It can also include “special categories of data”, which is information about your racial or ethnic origin, religious or other beliefs, and physical or mental health, the processing of which is subject to strict requirements. Similarly, information about criminal convictions and offences is also subject to strict requirements.

## Your personal data

We hold a range of personal data about you, some of which you provide to us directly and some of which we receive from third parties, such as your home institution, where relevant. **See below for further details of personal data we receive from third parties<sup>1</sup>**. Examples of categories of personal data which we hold are: your contact details, prior educational experience/attainment, immigration information (e.g. passport details, language proficiency, immigration history in the UK), where relevant, health information (including any disabilities) and other equality-monitoring data you provide to us. In addition, if you come to study with us, we process data about your academic performance, attendance and progression, and where relevant, breaches of our policies (e.g. academic or other misconduct concerning FIE-related activities). We also process contact and educational details after you have completed your programme or your activities with us are otherwise terminated.

## The purposes for which we process your personal data and the legal basis

In general terms, we process your personal data for the purposes of providing our academic and/or internship programmes and related services.

We only process data for specified purposes and if it is justified in accordance with data-protection law. The table below lists the various purposes for which we process personal data and the corresponding justification for it. Some processing of your personal data is justified on the basis of contractual necessity. In general, this applies to personal data you provide to us to process your application and if enrolled, to monitor academic performance. Without that information, we would be unable to provide you with your chosen academic programme and related support services. Some personal data is also required to fulfil some of our legal obligations as a Student Visa sponsor. A failure to provide that information would prejudice your application for a Student Visa.

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<sup>1</sup> If you apply to us for a place (or your home institution applies on your behalf) and you are not successful or do not take it up, we will hold only the data we need to assess the application.

Purpose	Legal basis/justification
Assessing eligibility to undertake our academic and/or internship programmes	Consent and/or processing is necessary for the purposes of taking steps prior to entering into a contract with us or with your home institution.
Provision of academic and/or internship programmes and related services (including IT and library services)	Necessary for performing a contract i.e. to provide your chosen academic programme and/or internship. This can be a contract with us or a contract between you and your sending institution (“contractual necessity”).
Assessment of academic progress and performance (including attendance)	Contractual necessity.
Administration of complaints, grievances and appeals	Contractual necessity.
Immigration matters	Necessary for us to comply with our legal obligations as a visa sponsor. Such processing may also be in the public interest and your consent may be required in some cases.
Making reasonable adjustments for disabilities and providing relevant support to students with ill health.	Consent.
Regulating FIE’s community (including dealing with misconduct under our procedures for academic and other misconduct)	Contractual necessity and our legitimate interest in maintaining academic standards.
Obtaining payment of fees	Contractual necessity and our legitimate interest in obtaining payment for the services we provide.
Protecting our property and assets (e.g. by dealing with misconduct)	Necessary for our legitimate interest in safeguarding our property and assets.
Providing appropriate I.T. and other infrastructure facilities e.g. a virtual learning environment	Contractual necessity; legitimate interest in providing a proper infrastructure to support the provision of academic and internship programmes and related student services.
Communicating with students	Contractual necessity and our legitimate interest in marketing FIE and promoting student welfare.
Assisting students to obtain residential accommodation/housing	Consent.

Alumni relations	Necessary for our legitimate interests in marketing, fundraising and maintaining an alumni network.
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There may be other processing in addition to the above, for example, when you access our website which uses cookies or when we take photos of our events and publish them. This is done on the basis of our policies and we will inform you about such processing at the time when the data is obtained or as soon as reasonably possible thereafter.

Where the basis of processing your personal data is contractual necessity and you fail to provide the personal data in question, FIE may not be able to process your application or provide you with the programme for which you have applied. A failure to provide immigration-related data may result in failure to obtain a visa for those students who require it.

### Personal data received from third parties

Data	Source
Your immigration status	Home Office (UKVI)
Transcripts - <i>details of programmes undertaken or being undertaken at the home institution; attainment</i>	Your home institution and/or secondary/high schools
Full legal name, preferred name, date of birth, email address, gender and passport details. This applies to a small sub-set of students for example those who have not met the application deadline or who have encountered problems completing the application process	Your home institution
Medical, mental health, accessibility-related and similar information (we only obtain this information from third parties if you give us consent to do so)	Your home institution, medical practitioners and/or family members

### Recipients of personal data

The following table lists what information we may share with whom: On occasion, we may need to share your data with third parties.

Recipients	Data which we may share with them
Academic staff	Contact details, attendance and progression information, health information (where necessary)

	for the implementation of reasonable adjustments and/or the provision of other support and subject to your consent)
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Our administrative/support staff	Contact details, immigration details, attendance and progression information, health information (where necessary for the implementation of reasonable adjustments and/or the provision of other support and subject to your consent)
Placement providers	Your CV as well as any accessibility and assistance requirements and related information
Co-curricular and/or extra-curricular excursion providers	Accessibility and assistance requirements and related information
Your home institution	Academic results; course registration information; disciplinary matters; health matters; and student feedback
Academic partners in the Republic of Ireland – Dublin Business School, University College Dublin and Trinity College Dublin (for students studying at the relevant institutions in the Republic of Ireland only)	Date of birth, gender, emergency contact information Academic records CV and volunteering history Details of disability and support needs, where applicable. (These are shared with consent)
UK Home Office	Passport details; programme details and fees; and housing details
AMIDEAST Jordan (for students studying in or from Jordan only)	Housing information; medical information; passport details; email addresses; gender; date of birth; name of university or college; and emergency contact details  (These details are shared with your consent)
Housing providers	Student personal details
Schools of Record (Drexel University and Marist College only)	If you are registered with Drexel for your official transcript, FIE will provide them your: name, email address, date of birth, gender, home institution, programme and course details If you are registered with Marist for your transcript, FIE will provide them your: name, gender, social security number, date of birth, home university, programme and course

	information major, citizenship, permanent address, phone number (These details are shared with your consent)
Data processors i.e. third parties who process personal data on our behalf e.g. software providers	Application details; attendance records.

### **Overseas transfers of personal data (i.e. outside the European Economic Area (EEA))**

As shown in the table above, we will share your data with your home institution, which may be outside of the EEA, on the grounds that such data transfer is necessary for performing our contract with you or for the purposes of our contract with your home institution, which is in your interest. As a UK resident (during your studies), your personal data will be protected under the General Data Protection Regulations (GDPR) or any equivalent UK Data Protection Act, enacted at the time of your studies.

### **Retention of data**

Your contractual information (e.g. details of your attendance, performance, contact details) will be kept for a limited period of time and then disposed of securely. Retention periods are usually linked to legal limitation (statute of limitation) periods.

### **Your rights as a data subject**

As a data subject, you have the following rights in relation to your personal data processed by us:

- To gain access to your personal data;
- To rectify inaccuracies or where appropriate, given the purposes for which your data is processed, the right to have incomplete data completed;
- To have your personal data erased. This is a limited right which applies, among other circumstances, when the data is no longer required, consent has been withdrawn and/or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest;
- To object to the processing of your personal data for marketing purposes. You may also object when the processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing;
- To restrict the processing of your personal data. This is a limited right which will apply in specific circumstances and for a limited period;
- To obtain a copy of your data in a commonly used electronic form if the data is processed by automated means and the processing is based on your consent or contractual necessity.

### **Withdrawing consent**

If we are relying on your consent to process your data, you may withdraw your consent at any time.

### **Exercising your rights, queries and complaints**

For more information on your rights, if you wish to exercise any right or for any queries you may have or if you wish to make a complaint, please contact our **Chief IT Officer**: Dr. Imad Al-Kadhim, Foundation

House, 114 Cromwell Road, London, SW7 4ES, [ialkadhim@fie.org.uk](mailto:ialkadhim@fie.org.uk)

## Complaints to the Information Commissioner

You have a right to complain to the **Information Commissioner's Office** (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>.

For personal data processed in relation to Dublin programmes, complaints may be made instead to the Irish Data Protection Commissioner. See <https://www.dataprotection.ie>

## FIE Website Information

The UK government has updated the Privacy and Electronic Communications Regulations in response to the EU Privacy Directive (GDPR). In light of this, the Information Commissioner's Office has provided guidance on the EU Cookie Law which came into effect in May 2012.

### What are cookies?

Cookies are small text files that the websites you visit place on your computer to store information about your visit. Cookies are 'passive' in that they contain information your browser can retrieve but do not contain programs, viruses, or malicious software. Cookies normally expire after a certain length of time, although that time can be anywhere from a few minutes to more than a year.

Cookies can be divided into two categories: 'session' and 'persistent'. Session cookies are temporary and are deleted when you close your browser or after a period of inactivity. Persistent cookies remain on your computer until the expiration date/time set by the cookie creator.

### What do cookies do?

Cookies can contain many types of information about your visit to a particular website, but most commonly are used to store the preferences you've selected, such as language, shopping cart contents, privacy settings and login state. Cookies do not contain personal or private data about you but can compile information about your browsing habits. For the most part, cookies enhance your browsing experience by keeping you from having to select the same options each time you visit a site.

However, cookies can also be used by websites to serve you advertising targeted to your particular interests based on the preferences you've selected or the content of the pages you have visited. For this reason, some web users choose to delete or reject cookies of certain types or from certain sites.

### Cookies set by FIE

FIE does not use cookies to collect personally identifiable information about you, track your behaviour or share information with 3rd parties from FIE owned websites.

Most cookies set are temporary, or session, cookies and they are removed from your browser when your session ends. You do not need to take any action to remove them. Some of these cookies are essential in providing the services you are requesting from us during the session so when they are disabled parts of the website may stop working. We, therefore, encourage you to accept the cookies

we serve. However, if you wish to restrict or block the cookies which are set by our or any other website, you can do this through your Browser settings.

### **Clearing or restricting cookies**

If you like keeping your browsing private, you may wish to [clear history and cookies](#) after the session. You can do so by using the browser, device settings or 3rd party tools. You may also wish to check and set any devices or browsers to restrict or block cookies by default for all or selected websites only. You can [manage cookie usage](#) through your browser settings.

Mobile devices may have their own settings and you may need to refer to vendor manuals. Please note that disabling or restricting cookies may impact some parts of the FIE website and they will stop working.