

CONTENTS

CLAUSE

| | |
|--|---|
| 1. Important Information And Who We Are..... | 2 |
| 2. The Information We Collect About You | 2 |
| 3. How Is Your Personal Information Collected?..... | 3 |
| 4. How We Use Your Personal Information..... | 4 |
| 5. Disclosures Of Your Personal Information | 5 |
| 6. International Transfers..... | 6 |
| 7. Information Security..... | 6 |
| 8. Information Retention | 7 |
| 9. Your Legal Rights | 7 |
| 10. What Happens If I Choose Not To Provide My Personal Information? | 8 |
| 11. How To Contact Us | 8 |

Our Policy

We give you the power to share in the world of international education as part of our mission to connect you with leading universities, to expand your opportunities for higher education and help you succeed and transform your lives. This policy describes what information we collect from you and how it is used and shared.

Introduction

INTO Manchester Limited (“we, us, ours”) respects your privacy and is committed to protecting your personal information. This privacy notice will inform you as to how we look after your personal information and tell you about your privacy rights and how the law protects you.

By using our services you acknowledge that you have read and understood the terms of this privacy notice, including how we use your personal information. Please click on one of the links below to find out more information.

Protecting the privacy of young children is especially important to us. For that reason, we do not knowingly collect or maintain personal information or non-personally identifiable information from users under 13 years of age, other than as permitted by law in support of our internal operations.

We reserve the right to update this privacy notice at any time by changing it as it applies to your use of our services.

1. IMPORTANT INFORMATION AND WHO WE ARE

2. WHAT TYPES OF INFORMATION DO WE COLLECT ABOUT YOU?

3. HOW IS YOUR PERSONAL INFORMATION COLLECTED?

4. HOW WE USE YOUR PERSONAL INFORMATION

5. DISCLOSURES OF YOUR PERSONAL INFORMATION

6. INTERNATIONAL TRANSFERS

7. INFORMATION SECURITY

8. INFORMATION RETENTION

9. YOUR LEGAL RIGHTS

10. WHAT HAPPENS IF I CHOOSE NOT TO PROVIDE MY PERSONAL INFORMATION?

11. HOW TO CONTACT US

1. Important Information And Who We Are

Purpose of this privacy notice

Your trust is very important to us and this privacy notice aims to give you information on how INTO Manchester Limited collects and processes your personal information.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide to you on specific occasions when we are collecting or processing personal information about you so that you are fully aware of how and why we are using your information. This privacy notice supplements the other notices and is not intended to override them.

Controller

The data controller is responsible for collecting and using your personal information. To comply with data protection legislation, the data controller will be INTO Manchester Limited whose registered office is at One, Gloucester Place, Brighton, BN1 4AA.

It is important to us that the personal information we hold about you is accurate and current. Please contact us if your personal information changes during your relationship with us.

If you have any questions about this privacy notice, please contact us as specified in the “**How To Contact Us**” section below.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The Information We Collect About You

Depending on which services you use, we collect different kinds of information from or about you. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include information where the identity has been removed (anonymous information).

We may collect, use, store and transfer different kinds of personal information about you which we have grouped together as follows:

- **Identity Information** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Information** includes home address, term time address, email address and telephone numbers.
- **Education Information** includes your educational history.
- **Compliance Information** includes details regarding your visa.

- **Financial Information** includes bank account and payment card details.
- **Transaction Information** includes details about payments to and from you and other details of the services you have purchased from us.
- **Technical Information** includes internet protocol (IP) address, your login information, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our services.
- **Profile Information** includes your username and password, your feedback and survey responses.
- **Usage Information** includes information about how you use our website and services.
- **Marketing and Communications Information** includes your preferences in receiving marketing from us and related third parties and your communication preferences.
- **Special Categories of Personal Information** includes details about your ethnic origin, your health or disabilities, or any criminal convictions that we may receive from you.

3. How Is Your Personal Information Collected?

We use different methods to collect information from and about you, including through:

- **Information you provide.** You may give us information including your Identity, Contact, Education Financial, and Special Category Information either in hard copy or online, when you enrol with us. This includes personal information you provide when you:
 - confirm your acceptance to study with us;
 - enrol on your course with us;
 - request marketing material to be sent to you;
 - take part in a survey; or
 - give us some general feedback or get in contact with us.
- **From websites and apps that use our services.** As you interact with our website, we may automatically collect Technical Information about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies. To find out more about the way we use cookies and similar technologies please visit our Cookie Policy.
- **Third parties or publicly available sources.** We may receive personal information about you from various third parties including Technical Information from analytics providers and search information providers; Contact, Financial and Transaction Information from payment providers who administer payments from you on our behalf; Identity, Contact and Education Information from your progressing university and Compliance Information from regulatory agencies including UK Visas and Immigration.

4. How We Use Your Personal Information

We are passionate about ensuring the success, and transforming the lives, of our students. We will use your information to help us ensure that we provide, improve and develop our services for you.

We need to have a valid reason to use your personal information, this is called the "lawful basis for processing". Sometimes we might ask your permission for us to do something with your personal information: for example, when you give your consent to allow us to contact you by email about a new service we are providing. At other times, we don't need to ask your explicit permission because we have a lawful basis for processing your personal information, and you might reasonably expect us to use your personal information. For example, in administering your course and marking your assignments, we would be performing our part of the contract we have with you.

Collected information may be used in the following ways:

- where we need to perform the contract we are about to enter into, or have entered into, with you in respect of the course you have applied to study on.
- where it is necessary for our legitimate interests, and your interests and rights do not override those interests: for example, to allow us to carry out an internal analysis of your feedback on your course to improve the student experience in the future.
- where we need to comply with a legal or regulatory obligation: for example, to comply with statutory reporting or any new legislation or regulatory requirement.

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, and that reason is compatible with the original purpose. If you wish to get more information on the basis on which we process your personal information you can contact us at privacy.intoman@intoglobal.com.

- a. to register you as a new student when you enrol on your course with us;
- b. to teach you and mark your assignments;
- c. to process and fulfil your accommodation request;
- d. to assist you with any pastoral requests;
- e. to assist you in your progression to your chosen university;
- f. to collect and process any payments you may owe to us in accordance with our student terms and conditions;
- g. to deliver our services to you and to provide you with information about them, including letting you know about any new offers, courses and services which may be of interest to you;
- h. to enable you to participate in any surveys or any other promotions we may be running;

- i. to administer and protect our business and our website; and
- j. to deal with any enquiries or complaints from you.

Marketing

We aim to provide you with choices regarding how we contact you around the marketing and advertising of our services.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Information to form a view on what we think you may want or need, or what may be of interest to you: for example, in respect of a new course that is being offered or a new promotion that we are running. We conduct surveys and research and analyse the information that we have in order to evaluate and improve existing products and services and develop new products or features.

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving communications from us.

Cookies

We use cookies and similar technologies to provide and support our services. Please read our Cookies Policy to learn more.

5. Disclosures Of Your Personal Information

We may share your personal information with selected third parties including:

- the university that you wish to progress to;
- accommodation providers, if you have requested us to provide accommodation for you whilst you are studying with us;

- education counsellors whom you have instructed to act on your behalf;
- third party suppliers, service providers and sub-contractors who perform any services for us: for example, payment processing companies who process your payments on our behalf; technology companies whose systems we use or third parties who provide services to carry out marketing campaigns on our behalf;
- analytics and search engine providers that assist us with the improvement and optimisation of our websites;
- third parties with whom we have a duty to disclose, for example, where disclosure is necessary due to a legal process or an enforceable governmental request, such as a request from UK Visas and Immigration or the Higher Education Funding Council for England; or third parties we need to share your personal information with if we need to protect you or other people from harm; and
- third parties to whom we may choose to sell, transfer or merge part of our business to or with. Alternatively, we may seek to acquire other businesses or merge with them.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal information for their own purposes and require them to process your personal information for specified purposes in accordance with our instructions.

6. International Transfers

The information we collect from you may be transferred to, and stored at, destinations outside the European Economic Area (the “EEA”). It may also be processed by staff operating outside the EEA who work for us or one of our suppliers. Such staff may be involved in advising you as to which course or university you wish to apply to, helping you with your application to us or providing support services as we require. By submitting your personal information to us, you are acknowledging that it could be being transferred, stored or processed in a location outside the EEA. We will seek to ensure your information is treated in accordance with this privacy policy.

7. Information Security

We place great importance on the steps we take, including use of different technologies and physical and organisational measures, to protect your information from unauthorised access and against unlawful processing, accidental loss, alteration, disclosure, destruction and damage.

The confidentiality of any password that enables you to access certain parts of our website is your responsibility, whether we have given you the password or you have chosen it yourself. We ask you to please not share your password with anyone. We will not be liable for any unauthorised transactions entered into using your username, personal information and/or password.

8. Information Retention

How long will you use my personal information for?

We will retain your personal information for as long as necessary to fulfil the purposes we collected it for, including satisfying any legal, accounting, or reporting requirements: for example, any reporting requirements we have to comply with for UK Visas and Immigration. We may also retain it for a period after this time as may be necessary and relevant to our legitimate operations.

In some circumstances we may anonymise your personal information (so that it can no longer be associated with you) for statistical purposes in which case we may use this information indefinitely without further notice to you. We may also retain a record of your stated objection to the processing of your information, including in respect of an objection to receiving communications, for the sole purpose of ensuring that we can continue to respect your wishes to not contact you further, during the term of your objection.

9. Your Legal Rights

You have a number of rights in relation to your personal information under data protection law, including, the right to:

- Request access to your personal information;
- Request the correction of your personal information;
- Request erasure of your personal information;
- Object to the processing of your personal information;
- Request the restriction of processing of your personal information;
- Request the transfer of your personal information; and
- Withdraw your consent.

If you wish to exercise any of the rights set out above, or require further information about any of the rights, please contact us. We will need to request specific information from you in order to be able to deal with your request. This is a security measure designed to ensure that your personal information is not disclosed to any person who has no right to receive it. We will confirm the specific information required from you when you contact us. We may also contact you to ask for further information in relation to any request you make in order to speed up our response.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Time limit to respond

We aim to respond to all legitimate requests as soon as possible and within one calendar month of receipt. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. What Happens If I Choose Not To Provide My Personal Information?

Where we need to collect personal information by law, or under the terms of a contract we have with you and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to teach you on your requested course or provide your requested accommodation). In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

11. How To Contact Us

If you have any questions or comments about this privacy notice, please contact us as indicated below:

Email: privacy.intoman@intoglobal.com

By post: F.A.O The Centre Director at INTO Manchester Limited, One, Gloucester Place, Brighton, BN1 4AA.

Thank you for taking the time to read our privacy notice.