

What is the purpose of this Privacy Policy?

BPP respects your privacy and is committed to protecting your personal data. The aim of this Privacy Policy is to give you information on how BPP collects and processes your personal data through:

- a. your use of BPP websites, including any data you may provide through BPP websites when you make an enquiry or purchase a product or any course/programme (whether online, face to face or distance learning) and whether on behalf of yourself or as an employer client ("Services");
- b. your registration for, purchase of or use of any BPP products and/or Services (including but not limited to courses, programmes or study materials (in any medium));
- c. your use of any BPP social media channel; and
- d. your sending of personal data to BPP by any other means.

This Policy will also inform you of what we do with personal data, how we look after personal data and tell you about your privacy rights and how the law protects you.

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

This Privacy Policy is provided in a layered format so, if you wish, you can select the specific areas of the Policy you are interested in, as set out below. We have also included a Glossary to help you understand the meaning of some of the terms used in this Privacy Policy.

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1. Who we are

Data Controller

BPP Holdings Limited is the parent company of several different BPP companies within the UK and the Channel Islands. Details of the companies which make up the BPP Holdings group can be found [here](#).

For ease of reference this Policy shall refer to the relevant companies under BPP Holdings Limited as the **“BPP Professional Education Group”**.

This Privacy Policy is issued on behalf of the BPP Professional Education Group so when we mention “BPP”, “we”, “us” or “our” in this Privacy Policy, we are referring to the relevant company in the BPP Professional Education Group responsible for processing your data. The table below sets out which BPP entity will be the data controller of your personal data when you use certain BPP websites.

This Policy shall apply to any BPP website including any subdomains that may be made available by us from time to time; including websites with the ending ‘.bpp.com’; and all BPP social media channels (**“Website(s)”**):

Website Domain (and any subdomains)	Relevant Data Controller
acted.co.uk	Actuarial Education Company Limited
bppacted.com	BPP Actuarial Education Limited
learningmedia.bpp.com	BPP Learning Media Limited
bppprofessionaldevelopment.com cimaondemand.com shop.bpp.com store.bpp.com accacpdstore.com onlinelearning.bpp.com	BPP Professional Education Limited
bppathena.com bppcollegepayments.com bpphelp.wordpress.com	BPP University Limited
bpp.com/about-bpp/locations/Guernsey bpp.com/about-bpp/locations/jersey	BPP (CI) Limited
bpp.com blog.bpp.com my.bpp.com my.bppuniversity.ac.uk	Actuarial Education Company Limited BPP Actuarial Education Limited BPP Learning Media Limited BPP Professional Education Limited BPP University Limited These websites are used by several BPP group companies and therefore the relevant data controller will be the entity delivering the Services to you.

Contact details

We have appointed a data protection officer (“DPO”) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your [legal rights](#), please contact the DPO using the following details:

FAO of the Data Protection Officer
BPP Professional Education Group (or select the relevant BPP entity from the list above)
Legal Team
4th Floor, 3 London Wall Buildings
London
EC2M 5PD

Email address: Dataprotection@bpp.com

You have the right to make a complaint at any time to:

- the Information Commissioner’s Office (“ICO”), the UK supervisory authority for data protection issues (www.ico.org.uk);
- the Data Protection Commissioner, the supervisory authority for data protection issues in Guernsey (www.dataci.gg); or
- the Office of the Information Commissioner, the supervisory authority for data protection issues in Jersey (www.dataci.je).

We would, however, appreciate the chance to deal with your concerns before you approach the ICO (or other relevant authority) so please contact us in the first instance.

2. Important information about this Policy

Changes to the Privacy Policy and your duty to inform us of changes

On 25 May 2018 the data protection law in the UK and Channel Islands will change. This Privacy Policy sets out your rights under the new laws.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

We may update this Privacy Policy from time to time. This version was last updated on 18 May 2018.

If you reject the terms of this Privacy Policy

If you do not agree to your personal data being used in accordance with this Privacy Policy, please do not submit your personal data to us through the Website or any other means.

Third-party links

The 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 data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our Website, we encourage you to read the privacy policy of every website you visit.

3. Your personal data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- **Audio / Visual Data** includes recordings from closed circuit televisions systems in place for security purposes at our premises, telephone recordings (for monitoring and training purposes) where you call any of our student advice teams, recordings (including video, audio and text) where any lecture, seminar, webinar or other interactive teaching session is recorded; video recordings from recorded exams/assessments (including mock exams/assessments); and any video recordings from any recorded interviews (such as credibility interviews and English language interviews for visa compliance purposes).
- **Contact Data** includes billing address, delivery address, postal address, email address and telephone numbers.
- **Eligibility Data** includes education/academic history, records of qualifications and/or training, personal statements and references. For international students this may also include copies of bank statements or other financial information to ensure visa requirements are met.
- **Employment Data** (this is relevant where your place on a course or programme is sponsored by your employer/future employer) includes name of employer, job title, work contact details (email address, telephone number and postal address), National Insurance number and employment start and end dates.
- **Financial Data** includes bank account, billing information, payment card details and information from any student loan organisation.
- **Identity Data** includes first name, maiden name, last name, student reference number, usernames for BPP sites (including for BPP e-commerce sites, BPP's Virtual Learning Environment, BPP's CareerHub, BPP's Student Association, Athena) or similar identifier (including any student registration number assigned to you by an external body who shares information with us such as ACCA/CIMA, UCAS/LawCabs/BarSAS, SRA/BSB), marital status, title, date of birth and gender.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Next of Kin Data** includes the name and contact information of a friend or relative to be used in the event of an emergency involving you. This will also include (for international students) the details of any friend or relative with whom you are staying, as declared on any visa application.
- **Profile Data** includes your usernames and passwords (for BPP platforms), purchases or orders made by you, your interests, preferences, feedback, survey responses and enquiries submitted to BPP.
- **Recruitment Data** includes any information you have provided to us in your curriculum vitae, any covering letter, any application form (including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications and reasons for wanting to apply for the relevant position) and any information you provide to us during an interview.
- **Student Data** includes the course or programme you are studying with BPP, your years of study, records of achievements on the course or programme (exam, assessment and mock results), exam scripts, exam transcripts, attendance and progress information, feedback from lecturers or personal tutors (including student references), emails sent by you to BPP, emails sent/received by you to or from your BPP email address or messages posted on BPP's VLE, information relating to your use of BPP's library and library resources (including materials checked out and overdue items), information relating to your involvement in BPP's student association (including membership of student groups or attendance of student events), information relating to your involvement in BPP's mentoring or entrepreneurship schemes, information relating to your involvement in BPP's alumni network, information relating to your registration for or attendance at any BPP hosted/advertised events, information relating to your use of or involvement with BPP's CareerHub, information relating to allegations of academic misconduct or other matters of discipline, information relating to any application for mitigating circumstances, any application for deferrals or interruption of studies and any complaints made by you or about you to BPP.
- **Technical Data** includes internet protocol (IP) address, your login data, 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 this website.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Usage Data** includes information about your visit to a Website, including the Uniform Resource Locators (URL) clickstream to, through and from the Websites (including date and time), products and/or services you viewed or searched for, page response times, download errors, lengths of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the page and any phone number used to call our customer services numbers.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

Special Categories of Personal Data

The law requires that “special categories” of particularly sensitive personal information require higher levels of protection than other personal data.

In some circumstances we may also collect, store and use the following “special categories” of more sensitive personal information:

- **Information about your race or ethnicity** - this information is collected for equality and diversity monitoring purposes. We also collect this information on behalf of the Education and Skills Funding Agency (in relation to apprenticeship students) and the Higher Education Statistics Agency in respect of BPP University students (please see section 7 for further information). This information is voluntary.
- **Information about your gender identity** - this information is collected in respect of apprenticeship students and BPP University students for equality and diversity monitoring purposes. We also collect this information on behalf of the Higher Education Statistics Agency (please see section 7 for further information).
- **Information about your sexual orientation** - this information is collected in respect of apprenticeship students and BPP University students for equality and diversity monitoring purposes. We also collect this information on behalf of the Higher Education Statistics Agency (please see section 7 for further information).
- **Information about your religious beliefs** - this information is collected in respect of apprenticeship students and BPP University students for equality and diversity monitoring purposes. We also collect this information on behalf of the Higher Education Statistics Agency (please see section 7 for further information).
- **Information about your nationality and immigration status** - this information is required to ensure that, where relevant, prospective BPP students have the correct visa or right to study in the UK in order to enrol onto a course or programme. Accordingly, we will collect information such as copies of passports, copies of visas and any relevant correspondence between you and the UK Visas and Immigration department of the Home Office. We cannot enrol any students onto a course or programme without completing these checks.
- **Information about any disabilities or learning needs** - this information is collected so that any reasonable adjustments can be made to accommodate students with disabilities (for example large print learning materials or exam papers) and also to ensure that any learning needs are supported (for example extra time in exams). This information is voluntary.
- **Medical information** - this information may be collected where a medical issue is having an impact on your studies with BPP (for example, you may have a prolonged period of absence; or you make an application for an interruption of studies where an illness is preventing you from studying; or where a medical issue has affected your performance in an exam, you may make an application for mitigating circumstances). It may also include dietary requirements where you are attending a catered BPP event (this information may be provided to BPP via third parties such as Eventbrite). This information is voluntary.
- **Information about criminal convictions and offences** - this information will be collected where it is a legal requirement of the course or programme applied for (for example all student nurses must undergo an enhanced criminal records check in accordance with safeguarding legislation). You will be informed if the course or programme you are applying for requires a criminal records check and be given the chance to withdraw your application should you not agree to such a check being undertaken.

In addition, we will also ask you to provide confirmation of whether you have any unspent criminal convictions as part of the application process. Any declaration will not be an automatic bar to your application but BPP will have to evaluate the details of such conviction for two reasons. Firstly, to ensure there is no threat to the safety of other students and staff at BPP and secondly to advise whether your conviction is likely to bar you from your chosen profession.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to enrol you onto a relevant course or programme or provide goods or services to you). In this case, we may have to withdraw your application or cancel/restrict a product or Service you have with us, but we will notify you if this is the case at the time.

4. How is your personal data collected?

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

- **Direct interactions.** You may give us your Identity, Contact, Eligibility, Employment, Financial and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - a. apply for a course or programme;
 - b. submit an online query or request a call back;
 - c. purchase goods or Services from us;
 - d. speak with one of our student advice or admissions teams;
 - e. speak with one of our client or supplier services teams;
 - f. create an account on our Website;
 - g. subscribe to a service or publication;
 - h. subscribe, register, take part in or view any BPP webinar;
 - i. request marketing to be sent to you;
 - j. enter a competition, promotion or complete a survey; or
 - k. give us feedback.
- **Through your Studies.** You may give us your Student Data throughout your time on a course or programme. This includes personal data you provide when you:
 - a. attend lectures, seminars, webinars or other learning sessions;
 - b. submit work for assessment;
 - c. take exams or other forms of assessment;
 - d. submit any applications relating to your studies (for example mitigating circumstances applications);
 - e. raise any issues or questions with your lecturer / personal tutor; or
 - f. contact one of our student advice teams for support.
- **Automated technologies or interactions.** As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](#) for further details.
- **Third parties.** We may receive personal data about you from various third parties as set out below:
 - Contact, Eligibility, Employment and Identify Data from your employer where your employer/future employer is sponsoring your place on a BPP course or programme (including apprenticeships and traineeships) ^Δ;
 - Contact, Eligibility and Identify Data from third party education applications providers (including UCAS, LawCabs, BarSAS etc.);
 - Contact, Eligibility and Identify Data from third party apprenticeship/traineeship recruiters (including Get My First Job, Job Train, the Princes Trust, Career Connect and Talent Match) ^Δ;
 - Identity, Contact, Eligibility, Transactional and Student Data from any external awarding bodies which you may be registered with in order to complete the course or programme you are studying with BPP (including ACCA, CIMA, ICAEW, ICAS etc.) ^Δ;
 - Identity and Student Data from any third party assessment/examination centre or external exam marker or invigilator (for example where you request to sit a BPP exam abroad; or your course or programme requires an external assessment organisation to provide your final examination/assessment; or any organisations which review assessment submissions for plagiarism such as Turnitin) ^Δ;
 - Contact, Identity, Marketing and Communications, Profile, Recruitment, Student, Technical and Usage Data from any third party portals which are used to provide you with student services, such as the student association (MSL Membership Solutions), student advice (AdvicePro), careers service (CareerHub), sports clubs (British Universities & Colleges Sport) and timetabling (Scientia) ^Δ;
 - Student Data from any freelance tutor or external presenter engaged by BPP who has delivered teaching to you as part of your course or programme. This includes Gmetrix for the Microsoft Office Specialist (MOS) Programme ^Δ;

- Student Data and Identity Data from any other education provider with whom BPP has subcontracted any element of the teaching of your course or programme (particularly relevant to apprenticeships) ^Δ;
- Contact, Eligibility and Identity Data from overseas agents, engaged by BPP who assist overseas students in submitting applications for courses or programmes to BPP ^Δ;
- Identity and Student Data from any third party assessment/exam portal provider, such as Questionmark ^Δ;
- Identity, Contact and Student Data from any third party survey organisation or portal provider, such as SurveyMonkey and Eventbrite ^Δ;
- Data relating to criminal convictions and offences from the Disclosure and Barring Service (and any umbrella body company used to access DBS checks) ^Δ;
- Data relating to any legal complaint or dispute you may have or be involved with from a solicitor acting on your behalf or the Office of the Independent Adjudicator ^Δ;
- Technical Data from analytics providers such as Google, Sessioncam, Hotjar and Optimizely; advertising networks; and search information providers;
- Contact, Financial and Transaction Data from any third party student loan providers including The Student Loans Company, States of Guernsey, States of Jersey and Future Finance ^Δ; and
- Contact, Financial and Transaction Data from providers of technical, payment and delivery/courier services (where you order hard copy study materials) such as SmartDebit, Worldpay, Sage Pay, CourseMerchant, CPG Logistics and Ricoh UK Limited ^Δ.

5. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your consent.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Where we are relying on your consent as a legal basis for processing your personal data, for example where we collect voluntary “special category” personal data (as set out in this Policy above) you may withdraw your consent to this processing at any time by [contacting us](#).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Please be aware that, if you are a student with BPP, in the majority of cases we will have a contract in place with you in respect of the course or programme you are undertaking. Therefore, our lawful basis for processing your personal data will be to perform our contract with you.

However, in some instances we will have a contract in place with your employer or prospective employer. For example, some businesses will ask BPP to deliver a bespoke course or programme to a group of its employees. In these cases, BPP has a contract in place with your employer and not you as an individual. In these scenarios, BPP will process your personal data as necessary for our legitimate interests, i.e. the delivering of services to your employer under a contract in place between BPP and your employer.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Students or prospective students		
To respond to enquiries or requests for information	a. Identity b. Contact	<ul style="list-style-type: none"> Performance of a contract with you Consent
To assess your eligibility to be enrolled onto a particular course or programme with BPP	a. Contact b. Eligibility c. Employment* (if sponsored by an employer) d. Identity e. Audio/Visual	<ul style="list-style-type: none"> Performance of a contract with you Necessary for our legitimate interests (to deliver services to your employer under a contract in place between BPP and your employer)
To recruit you for apprenticeships/traineeships with BPP's selected employer clients	a. Recruitment	<ul style="list-style-type: none"> Consent Necessary for our legitimate interests (to recruit apprentices/trainees for our employer clients)
To review and process any application you make for a position or post within BPP, including: <ul style="list-style-type: none"> to create a student club or society, or become a member of the Exec Committee for such club or society to join BPP's pro bono programme as a student advisor to be a Committee Member of BPP's Student Association to be a student mentor in response to any vacancy advertised via the Careers Team (including CareerHub) 	a. Identity b. Contact c. Recruitment d. Student	<ul style="list-style-type: none"> Consent Performance of a contract with you
To register/enrol you as a student with BPP	a. Contact b. Eligibility c. Employment* (if sponsored by an employer) d. Identity	<ul style="list-style-type: none"> Performance of a contract with you *Necessary for our legitimate interests (to deliver services to your employer under a contract in place between BPP and your employer)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
Students or prospective students		
To deliver the course or programme to you	a. Audio/Visual b. Contact c. Identity d. Profile e. Student	<ul style="list-style-type: none"> Performance of a contract with you *Necessary for our legitimate interests (to deliver services to your employer under a contract in place between BPP and your employer)
To: <ul style="list-style-type: none"> Manage payments, fees and charges Collect and recover money owed to us Keep records for audit/accounting purposes Defend any legal claims brought against BPP 	a. Identity b. Contact c. Financial d. Transaction e. Student	<ul style="list-style-type: none"> Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us or defend legal claims) Necessary to comply with a legal obligation
To participate in surveys or similar research and analysis exercises undertaken by governmental or other agencies (including but not limited to the Department for Education, Higher Education Funding Council for England, the Office for Students or the Higher Education Statistics Agency) (or any successor body to them) or by third parties engaged by such bodies	a. Identity b. Eligibility c. Student	<ul style="list-style-type: none"> Necessary for our legitimate interests (to study how students use our services, to develop them, to grow our business and to inform our strategy) Necessary to comply with a legal obligation
Customers (or prospective customers) of learning materials		
To register you as a new customer when purchasing learning materials from BPP	a. Identity b. Contact	<ul style="list-style-type: none"> Performance of a contract with you
To process and deliver your order including: <ul style="list-style-type: none"> Manage payments, fees and charges Collect and recover money owed to us Keep records for audit/accounting purposes Defend any legal claims brought against BPP 	a. Identity b. Contact c. Financial d. Transaction e. Marketing and Communications	<ul style="list-style-type: none"> Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us or defend legal claims) Necessary to comply with a legal obligation
Clients of BPP (including employer clients)		
To register you as a client of BPP	a. Identity b. Contact	<ul style="list-style-type: none"> Performance of a contract with you
To process and deliver the service: <ul style="list-style-type: none"> Manage payments, fees and charges Collect and recover money owed to us Keep records for audit/accounting purposes Defend any legal claims brought against BPP 	a. Identity b. Contact c. Financial d. Transaction e. Marketing and Communications	<ul style="list-style-type: none"> Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us or defend legal claims) Necessary to comply with a legal obligation
Suppliers to BPP		
To register you as a supplier of BPP	a. Identity b. Contact	<ul style="list-style-type: none"> Performance of a contract with you
To process and receive goods/services: <ul style="list-style-type: none"> Manage payments, fees and charges Keep records for audit/accounting purposes Defend any legal claims brought against BPP 	a. Identity b. Contact c. Financial d. Transaction e. Marketing and Communications	<ul style="list-style-type: none"> Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us or defend legal claims) Necessary to comply with a legal obligation

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
For All		
To manage our relationship with you which will include: <ul style="list-style-type: none"> ▪ Notifying you about changes to our terms or privacy policy ▪ Asking you to provide feedback or take a survey 	a. Identity b. Contact c. Profile d. Marketing and Communications	<ul style="list-style-type: none"> ▪ Performance of a contract with you ▪ Necessary to comply with a legal obligation ▪ Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	a. Identity b. Contact c. Profile d. Usage e. Marketing and Communications	<ul style="list-style-type: none"> ▪ Performance of a contract with you ▪ Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a. Identity b. Contact c. Technical	<ul style="list-style-type: none"> ▪ Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) ▪ Necessary to comply with a legal obligation
To deliver relevant Website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	a. Identity b. Contact c. Profile d. Usage e. Marketing and Communications f. Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Website, products/services, marketing, student/customer/client relationships and experiences	a. Technical b. Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods, services or events that may be of interest to you	a. Identity b. Contact c. Technical d. Usage e. Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

How we use particularly sensitive personal information

“Special categories” of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

Purpose/Activity	Type of data	Lawful basis for processing
Students or prospective students		
To confirm that you have the correct immigration status to be enrolled as a student with BPP	Data relating to nationality and immigration status (copies of passports and visas)	<ul style="list-style-type: none"> Performance of a contract with you Complying with our legal obligations to the UK Home Office
To provide reasonable adjustments to students with disabilities and to provide learning support to students who have learning needs	Data relating to disabilities and/or learning needs	<ul style="list-style-type: none"> Performance of a contract with you Complying with our legal obligations (under the Equality Act 2010) Your explicit consent (this information is voluntary)
To: <ul style="list-style-type: none"> Monitor periods of absence* Deal with applications for mitigating circumstances Deal with applications for interruptions of studies or deferrals Confirm any dietary requirements for BPP catered events 	Medical data (may include doctors notes or medical records)	<ul style="list-style-type: none"> Performance of a contract with you Your explicit consent (this information is voluntary) *where it is a condition of a visa that a student must maintain a minimum attendance level we will request medical data to justify any absence to avoid being in breach of our obligations to the UK Home Office.
To carry out equal opportunities monitoring and reporting	Data relating to race and ethnic origin	<ul style="list-style-type: none"> Your explicit consent (this information is voluntary) It is in the public interest to process such data

Less commonly, we may also process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent (for example if you suffer a medical problem whilst on BPP’s premises).

Consent

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations.

In limited circumstances (as set out above), we ask you for your written consent to allow us to process certain particularly sensitive data. When we do, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

You should be aware that it is not a condition of your contract/right to study with us that you agree to any request for consent from us. However, we may not be able to provide you with certain services (such as learning support) if you do not agree to provide such data to us.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent.

We will only collect information about criminal convictions if it is appropriate given the course or programme you are seeking to be enrolled onto. For example, students seeking to enrol on courses or programmes which relate to nursing or other medical professions are required to undergo enhanced criminal records checks as these courses will involve students being placed in hospitals and other healthcare environments.

Where appropriate, we will collect information about criminal convictions as part of the application process or we may be notified of such information directly by you in the course of you studying with us. We will use information about criminal convictions and offences in the following ways:

- To ensure our compliance with relevant safeguarding legislation in relation to clinical placements.

We are allowed to use your personal information in this way to comply with our legal obligations. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- Where we have notified you of the decision and given you 21 days to request a reconsideration.
- Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do use automated technologies and decision making when deciding what marketing messages you receive. However, we do not envisage that any other decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established a preference centre where you can view and make certain decisions about your personal data use. If you agree to receive marketing from us you will receive a link to the preference centre by email.

The preference centre is not available for some actuarial courses/programmes and in respect of some client bookings and customer purchases. Where the preference centre is not available you will not receive a link to the preference centre. Instead your marketing opt-in preferences will be collected when you register, book a course/programme or make a purchase. You can opt out of receiving marketing at any time by replying to the sender of the marketing communication with the word "UNSUBSCRIBE".

If you do not agree to receive marketing from us, but change your mind at a later date, you can contact us and update your marketing preferences.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, Services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or Services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the BPP group of companies for marketing purposes.

Opting out

You can ask us to stop sending you marketing messages at any time by logging into the preference centre and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of you entering into a contract with us.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

Change of purpose

We will only use your personal data 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 an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Communications with BPP students

For some courses/programmes (typically BPP University courses/programmes), students will receive their own BPP email address (ending @bpp.com). Where you have a BPP email addresses (and are a current student) you should be aware that BPP will communicate with you via this email address, particularly where we need to disclose personal information to you (such as exam results).

It is therefore important that you check your BPP emails regularly.

You may choose to contact BPP using your personal email address, but please be aware that any responses containing personal data will then be sent to your BPP email address.

6. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 5 above.

- Internal Third Parties as set out in the [Glossary](#).
- External Third Parties as set out in the [Glossary](#).
- Specific third parties marked with ^A listed in paragraph 4 above (under the 'Third parties' heading).
- Specific third parties listed in paragraphs 7, 8 and 9 below.
- Your parent or guardian if you are under the age of 18 (or if you specifically request us to liaise with your parent or guardian on your behalf).
- External venues where some element of a course or programme (or event) is delivered (BPP may share Identity Data with the venue for registration and health and safety purposes).
- Counselling services, where you make a specific request via the Student Advice Team (BPP may share Identity and Contact Data).
- Turnitin, an academic plagiarism checker (BPP may share Identity and Student Data with Turnitin).
- Ede & Ravenscroft who organise ticketing and robes for BPP University graduations (BPP may share Identity, Contact and Student Data with Ede & Ravenscroft).
- Future employers or education providers where you specifically request that we provide confirmation of Identity or Student Data to those parties for reference purposes.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

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

7. Higher Education Statistics Agency

We will send some of the information we hold about you to the Higher Education Statistics Agency ("HESA"). This information forms your HESA record, which does not include your contact details.

Your Contact Data may be passed to survey contractors to carry out the [National Student Survey](#), the [Graduate Outcomes Survey](#) and surveys of student finances. These organisations and their contractors will use your Contact Data only for that purpose, and will then delete your information.

After you graduate we may contact you to ask you to complete one or more surveys into the outcomes of higher education and your activities after graduation. These surveys may be undertaken by us or by another specialist organisation contracted for that purpose. If a specialist organisation is used that organisation will receive your Contact Data, but will only use your details for the purpose of asking you to complete the survey, and will then delete them. You may also be contacted as part of an audit to check that we or any contracted organisation have undertaken these surveys properly.

If you do not want to take part in any of these surveys, please let us know.

Submission of your personal information to HESA

Every year we will send some of the information we hold about you to HESA. HESA is the official source of data about UK universities, higher education colleges, alternative higher education providers, and recognised higher education courses.

HESA is a registered charity and operates on a not-for-profit basis. Your HESA information is used for a variety of purposes by HESA and by third parties and full details of these are set out in HESA's Student Collection Notice. A copy of HESA's current Student Collection Notice (for the 2017/2018 academic year) is available [here](#) and updated versions are available [here](#).

8. Compliance with the Bribery Act and relevant legislation

In this Privacy Policy, we have explained that your personal data may be used for the purpose of ensuring compliance with legal obligations and that it may be disclosed to BPP's group companies' service providers or governmental departments. This includes for the purpose of enabling BPP's group companies to comply with the US Foreign and Corrupt Practices Act 1977 ("FCPA") and enabling BPP to comply with its obligations under the UK Bribery Act 2010 (the "Bribery Act") and any other local laws or regulations relating to similar purposes which relate to fraudulent, illegal or unethical behaviour (the "Conduct Legislation").

BPP's group companies may appoint one or more service providers to assist them in managing a whistleblowing helpline and a webpage which acts as a reporting mechanism ("Helpline") to ensure compliance with Conduct Legislation.

It is possible that a BPP staff member or student may report matters of concern through the Helpline and that your personal data may be used by BPP's group companies, its service provider(s) which manage the Helpline and by BPP for the purpose of investigating any such report and taking remedial action thereafter. For example, if a BPP employee suspects that another employee is misusing company records for his own purposes or is committing fraud involving your personal data, they may report this through the Helpline.

Should this happen, your personal data will only be used for the purpose of ensuring compliance by BPP's group companies with the relevant laws and regulations. Wherever reasonably possible, your personal data will be anonymised prior to use for the purpose of investigations and remedial action so that it does not relate to you. However, in some specific circumstances this may not be possible as it may prohibit a full investigation and prevent compliance with a relevant regulation or Conduct Legislation.

Any transfers to BPP's group companies and their service provider(s) which manage the Helpline and which may also be in the US or elsewhere in the world will be carried out in accordance with the law.

A limited number of specially trained employees from BPP's group companies will only have access to your personal data which is disclosed through the Helpline where and to the extent that this is necessary for the purposes of carrying out their roles and for the purpose of compliance. In any event, their access will be limited, secure, controlled and justified as BPP considers is fair and necessary in the circumstances. These employees will be subject to appropriate confidentiality obligations.

We encourage our employees to use the Helpline in good faith and only for serious or substantial issues which cannot properly be reported via other means.

Provided reports are made through the Helpline in good faith, we try to protect the confidentiality of your identity as far as is reasonably possible. However, we cannot guarantee this (especially in subsequent court or tribunal proceedings) and we are required to inform the subject of the reports about the allegation(s). Those subjects have the right to request their own personal data, as do you, as set out under [Your Legal Rights](#).

9. VLE

BPP offers a Virtual Learning Environment (“VLE”) to students and to selected sponsoring employers. The VLE is also accessed by BPP staff in order to deliver courses and programmes to students. Within the VLE the following data sharing is in operation:

- Your name, last log-in date, campus location and course or programme may be shared with other users of the VLE;
- The above details will be searchable to other VLE users, and you can be messaged through the VLE by other users based on your VLE user name;
- You may also elect to share your photo, a short biography and personal email address with other VLE users (this is voluntary);
- Your participation in online sessions (such as webinars or chatrooms), including your text, audio or video content may be recorded and shared with other VLE users;
- Third Parties chosen by BPP may review your interaction with the VLE to help BPP continuously improve the service.
- Exam or assessment results (including mocks) in the VLE may also be combined to derive benchmarks of performance to allow students to assess their performance in their chosen programme. These will only be presented in aggregate and individual results will not be disclosed.
- Any assignment or assessment uploaded or completed through the VLE will be shared with the appropriate BPP staff for the purposes of assessment. Assignments/assessments may be sent to third parties for the purpose of ensuring the work is original, attributes sources correctly and does not infringe on any existing copyright (see references to Turnitin in paragraph 6 above).
- VLE data relevant to assessing your progress within the course or programme may also be shared with your sponsoring employer.

10. CareerHub

BPP offers a Careers Service to students and to selected employers. Information on the services offered is available at <https://www.bpp.com/students/careers-service>.

In order to access some of the services you will need to create a BPP CareerHub account (“CareerHub”). The careers service webpage explains which services can be accessed via CareerHub.

Within the CareerHub you can undertake the following activities:

For Students and Alumni	For Employers
*Search and apply for (a) job vacancies; (b) volunteering opportunities; and (c) mentoring schemes	Advertise your vacancies
Sign up to attend BPP and *third party careers events	Advertise your (a) webinars; (b) insight days; and (c) open evenings
Book an appointment with a BPP careers consultant	Deliver a talk to BPP students
Access *careers related resources	Run (a) workshops; or (b) mock assessment centres
Ask a careers related question	Exhibit at BPP’s careers fairs
Submit feedback	

Please be aware that, for the services marked with an *, this will involve accessing third party websites and/or submitting your personal information to third parties. For example, where you apply for a job or volunteering opportunity with a third party employer, any data you submit via CareerHub will be passed to that third party so they may assess your application.

If you do not wish to share your information with third parties, then do not submit any information via CareersHub in respect of the services marked with a * above. If you have any questions regarding the use of your information or the relevant third party it is submitted to, please contact the Careers Service using the details [here](#).

For all other CareerHub services (not marked with an *) any personal information you submit will be processed in accordance with this Policy.

11. International transfers

As set out in this Policy, we share your personal data within the BPP Professional Education Group which includes BPP's ultimate parent company based in the USA. In addition, some of BPP's IT support (including its Helpdesk function) is based in the USA and India. BPP also utilises Turnitin (Turnitin, LLC) based in the USA. Therefore, we will transfer some of your data outside the European Economic Area (EEA).

The Websites and/or any products and/or Services may be hosted on servers located outside of the UK and/or the EEA and maintenance and support services for the Websites and/or those products and/or Services may be provided from outside the UK and/or the US and/or EEA. This means that your personal data may be transferred to, stored and processed in other countries apart from the UK and the Channel Islands, including outside of the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the USA, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please [contact us](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

12. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

As set out in paragraph 10 above, your personal data may be held on the IT system of BPP, BPP's group companies (e.g. for the purpose of providing training or educational services to you) and/or on the IT system of another third party company (within or outside of BPP) within or outside the EEA which is providing IT hosting or other data processing services, in accordance with BPP's arrangement in place with that company.

All information that you provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Websites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

13. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our Retention Policy which you can request by [contacting us](#).

As an education provider BPP will hold details of your transcript (i.e. your name, years of study, course or programme name, sponsoring employer, assessment and/or exam marks and final grade or award) indefinitely.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

14. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (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.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. 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.

15. Glossary

Lawful basis

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third parties

Internal Third Parties

Other companies in the BPP Professional Education Group acting as joint controllers or processors and who are based in the UK and the USA and provide IT and system administration services and undertake leadership reporting.

For details on how BPP's parent company (based in the USA) use personal data, please see their privacy policy [here](#).

External Third Parties

- Your employer, acting as a joint controller, where your employer/prospective employer is sponsoring your place on a course or programme (or where your employer/prospective employer has arranged for a course or programme to be delivered to a group of its employees/prospective employees). We will share information relating to your attendance, performance (including exam/assessment results and mock exam/assessment results) and general behaviour on the course/programme.
- Service providers acting as processors based in India and the USA who provide IT and system administration services (including HCL Technologies Limited and HCL America Inc).
- Service providers which act as processors in respect of our telephone call recording operations (NewVoiceMedia).
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, the UK Home Office, regulators and other authorities acting as joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Specific regulators in the field of education, including the Education and Skills Funding Agency (for apprenticeships and traineeships), The Federation for Industry Sector Skills and Standards (for apprenticeships), Ofsted, The Office for Students, The Quality Assurance Agency (or any successor organisation to the preceding) acting as joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Any professional body where this is relevant to the course or programme you have studied (for example, for students completing the LPC or BPTC, BPP will confirm Student Data with the Solicitors Regulation Authority or Bar Standards Board.)
- The police, where the police make a request for personal information to BPP or as and when we consider necessary for the purpose of crime prevention.
- The ambulance service if there is any immediate concern regarding your physical health or mental wellbeing.
- GPs, dentists, local councils, Transport for London or the National Union of Students (NUS) wherever you request BPP confirm your student status to these bodies to allow you to register for their services/student discounts.

Your legal rights

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. *Please be aware that this right does not apply to exam scripts or exam marks.*

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. *Please be aware that this right does not apply to exam scripts or exam marks.*

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. *Please be aware that this right does not apply to exam scripts or exam marks.*

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. *Please be aware that this right does not apply to exam scripts or exam marks.*

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.