

## **UCLan Cyprus Applicant Privacy Notice**

**How we use your information if you apply to study at the University of Central Lancashire, Cyprus (UCLan Cyprus)**

This privacy notice tells you what to expect us to do with your personal information when you apply to study at UCLan Cyprus. Personal information (or personal data) is any information which relates to and identifies you. Data protection legislation, the General Data Protection Regulation (GDPR) and the Data Protection Law (L.125/2018) set out how we should handle your personal information.

### **Our contact details**

The University of Central Lancashire Cyprus, UCLan Cyprus, is the data controller for the personal information we process, unless otherwise stated.

There are many ways you can contact us, including by phone, email, social media and post.

### **Our Data Protection Officer**

UCLan Cyprus' Data Protection Officer, Mr. Stylianos N. Christoforou, can be contacted on [DPO@uclancyprus.ac.cy](mailto:DPO@uclancyprus.ac.cy).

### **What personal information will we use?**

To assess your application to study here, the University uses the information you provide on your application form, as well as any supporting documents, references or records from interviews provided as part of the admissions process. If you are an international applicant and apply through one of our approved Agents, we will also use information about you provided by the Agent.

If we decide to offer you a place on a course, we will also collect information about whether or not you have a criminal conviction, which may include conducting a check with the appropriate authorities or we will ask you to provide us with certificate that you have a clear criminal record. The purpose of this is to ensure the safety of all students, staff and associates.

### **Why do we use your personal data?**

When you apply to study at UCLan Cyprus, we will use your information for the purposes set out below. The application process starts when you submit your application and ends when you successfully enrol.

#### **For the administration of your application**

We use your information to verify your identity; check your eligibility to study here, including making visa and immigration checks; assess your application, including requesting any additional information necessary for that purpose; assess your suitability to study on a particular course e.g. if that course leads to a career in a regulated profession and has an integral work placement which could not be undertaken in certain circumstances, such as because you have a relevant criminal conviction; decide whether or not to offer you a place, whether conditional or unconditional; and communicate with you throughout

the admissions process until your successful enrolment, including providing feedback on unsuccessful applications, where appropriate.

Where you have been offered a place, we will ask you to declare whether or not you have a criminal conviction (regardless of whether or not you are applying for a course which leads to a career in a regulated profession) and may request proof. We will also make additional checks in the event you do declare a criminal conviction. We use this information to consider whether it is appropriate to admit you to the University, in the context of helping to provide a safe community in which staff and students can teach and learn, and in which we can safeguard children (those under 18 years old) and vulnerable adults.

### **Communicating with you**

We will use your information to communicate effectively with you throughout the admissions process until you successfully enrol, via email, post, telephone, text (SMS), social media or other methods, as appropriate. We will also use your information to send you messages about University events, activities, services and facilities, and to keep you updated about a variety of things which may be helpful if you are considering whether or not to accept an offer of a place here or have already accepted an offer. If you have accepted an offer, we may also keep you informed of important updates using newsletters, circulars or other methods. You can opt out of receiving communications which are considered to be marketing by contacting the Marketing Department at [Marketing@uclancyprus.ac.cy](mailto:Marketing@uclancyprus.ac.cy).

### **Research, reporting and statistics**

We will use your information to compile statistics and for research, surveys and market research to help with corporate planning, reporting and University administration, as well as for statutory reporting purposes to external agencies, where required.

### **Monitoring and compliance**

We will use your information to ensure and monitor our compliance with legislation including laws relating to equality, health and safety and immigration.

### **What is the legal basis for this processing?**

The University relies on the following legal bases from the GDPR to process information about you for the purposes set out in this notice:

**Article 6(1)(b)**, which allows us to process personal data when it is necessary for the performance of a contract or for steps taken prior to entering into a contract. You enter into a contract with us when you accept an offer of a place (the student contract) and your application and our assessment of that application are the first steps to entering into that contract. Under your student contract, we deliver and administer your studies, administer finances, operate the University's regulations, rules, procedures and codes of conduct, communicate with you and deliver facilities and services, among other things. We require you to provide any information we reasonably request for the purposes of your application, otherwise we cannot assess your application with a view to making an offer and putting in place your student contract.

**Article 6(1)(c)**, which allows us to process personal data when it is necessary to comply with a legal obligation. We are legally required to provide some reports and statistics to external agencies, as well as monitoring compliance with laws relating to immigration (e.g. visas) and equality, among other things.

**Article 6(1)(e)**, which allows us to process personal data where it is necessary to perform a task in the public interest. Some internal reporting and monitoring, and research, is carried out as part of our public tasks.

**Article 6(1)(f)**, which allows us to process personal data where it is in our, or someone else's, legitimate interests to do so and it does not unduly prejudice your rights and freedoms. We rely on this condition to, among other things:

- communicate marketing messages to you (unless you opt out). It is in the University's legitimate interests to promote its services, courses and events to those who may be interested.
- produce some internal reports, research and statistics. It is in our legitimate interests to use these to evaluate, plan and assess how the University is operating and make any changes we think are appropriate and will benefit current and future students.

We also process some information only if you provide your consent. In this case, **Article 6(1)(a)** applies, and **Article 9(2)(a)** applies where the information is special category data (special category data is information about your race, ethnic origin, political opinions, religious beliefs, trade union membership, genetic data, biometric data used for ID purposes, health, sex life or sexual orientation). It will be clear where we are relying on your consent to collect and use your information because consent will be requested at the time you provide the information. When you are asked for consent, we will explain why we are asking for the information and how we will use it if you choose to provide it. Consent can be withdrawn at any time and we will explain how you can do this in each individual case.

Where we process special category data and data about criminal convictions for the purposes set out in this notice, we rely on the following legal bases from the GDPR and DPA:

**Article 9(2)(g) GDPR**, which allows us to process special category data if the processing is necessary in the substantial public interest and there is a basis to do so in law. Further information about the legal bases on which we rely to process these types of personal data can be found by contacting our Data Protection Officer at [DPO@uclancyprus.ac.cy](mailto:DPO@uclancyprus.ac.cy).

**Article 9(2)(j) GDPR**, which allows us to process special category data for archiving, scientific or historical research purposes or statistical purposes, where there is a basis to do so in law

### **Who will my personal information be shared with?**

We share your information with a range of external organisations and bodies, some of which are processing personal data on our behalf. We only share your personal data with another person or organisation where the law allows us to and we consider it to be appropriate under the circumstances. The external parties we may share information with include the following:

- **Higher Education bodies** both in Cyprus and UK, such as Ministry of Education.

- **Government agencies and authorities, including the police** for the prevention and detection of crime, apprehension and prosecution of offenders, the collection of tax or duty and safeguarding national security, among other things.
- **Local authorities or non-departmental public bodies** such as Cyprus Visas and Immigration, Revenue and Customs Authorities.
- **Loan providers and funding organisations:** This includes the Cyprus Government, EU and overseas research partners, consortium partners and research councils. We also share information if the terms of the loan or funding contract require information about attendance and/or progress. We will also assist students to apply for disability-related grants, where appropriate.
- **Embassies, consulates and other sponsors:** we may share information if a sponsor or similar can show they have a legitimate need
- **Your main education provider** if you are an exchange student.
- **Partner institutions** where you study at a CY/EU/UK or overseas partner institution and we are the awarding body for your course.
- **UCLan Cyprus and UCLan colleagues overseas** if you are an international applicant and it is necessary to share the data for the purposes of your application.
- **UCLan Cyprus Language Academy Partners** if you are registered for preparational on campus or online courses and you give us consent to share your information.
- **Local and International Agents** if you apply via an Agent.
- **Companies or organisations acting on our behalf:** We use data processors who are third parties who provide elements of services for us, such as our application system used for Admissions or UniBuddy. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will hold it securely and retain it for the period we instruct.

## **Sending your information outside the EU**

Occasionally we may need to send your personal information outside the EU e.g. to communicate with our international agents or partner institutions; to communicate with our colleagues overseas in your country (if you are an international applicant) or obtain a service from a data processor. These transfers are usually carried out with your consent or because they are necessary steps in the process of entering into your student contract. All transfers are carried out with appropriate safeguards in place to protect your information and ensure it remains secure.

## **How long will we keep your personal information?**

If you apply but your application is unsuccessful, we will retain your information for **one year** after the end of the application cycle in which you applied.

If you are offered a place, accept and enrol at UCLan Cyprus, we will keep your information for six years after you graduate or withdraw.

## **Your data protection rights**

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

### **Your rights are:**

Data Protection Officer  
**Stylianos N. Christoforou,**  
*Advocate, Certified TUV Austria DPO*

- To object to processing of personal data that is likely to cause, or is causing, damage or distress;
- To prevent processing for direct marketing;
- Under certain circumstances, to have access to your personal data or to have your personal data rectified, blocked, erased or destroyed

## Your right to complain

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact the relevant part of the University, or the Data Protection Officer ([DPO@uclancyprus.ac.cy](mailto:DPO@uclancyprus.ac.cy)) and we will respond.

You can exercise any one and all of your rights by submitting a Subject's Rights Request Form' that is provided by the Data Protection Officer ([DPO@uclancyprus.ac.cy](mailto:DPO@uclancyprus.ac.cy)) and mailed to:

UCLan Cyprus  
Mr. Stylianos N. Christoforou  
University Av. 12-14  
Pyla 7080  
Cyprus

Or to be submitted electronically to the Data Protection Officer of the university at [DPO@uclancyprus.ac.cy](mailto:DPO@uclancyprus.ac.cy)

If you have a concern about the way we are collecting or using your personal information, you should raise your concern with us in the first instance or directly to the office of the Commissioner for the Protection of Private Data. You can be provided the complaint forms for the Commissioner's office [here](#).

Office of the Commissioner for the Protection of Private Data  
1 Iasonos St.  
1082 Nicosia  
Cyprus  
Telephone number: 22818456  
Fax number: 22304565

To learn more about how we use your information please contact our Data Protection Officer at [DPO@uclancyprus.ac.cy](mailto:DPO@uclancyprus.ac.cy).