

UCLan Cyprus - Student Privacy Notice

How we use your information when you are a student

This privacy notice tells you what to expect us to do with your personal information when you enrol at UCLan and become a student. 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 Cyprus Data Protection Act 2018 (L.125/2018)) set out how we should handle your personal information.

Our contact details

The University of Central Lancashire, Cyprus, UCLan Cyprus, a Private University fully licensed and registered at the Ministry of Education and Culture of the Republic of Cyprus, and under the academic umbrella of the University of Central Lancashire, in Preston UK.

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 main contact details can be seen at <https://www.uclancyprus.ac.cy/connect/get-in-touch/contact-us/>.

Our Data Protection Officer

UCLan Cyprus' Data Protection Officer, Mr. Stylianos N. Christoforou, is our external legal advisor who is a TUV Austria Certified DPO, who can be contacted on DPO@uclancyprus.ac.cy. Further information and contact details can be found here <https://www.uclancyprus.ac.cy/data-protection-policy/>.

What personal information will we use?

The University uses information you provided on your application form or other type of application form, as well as any supporting documents, references or records from interviews obtained as part of the admissions process. We also collect and use information you provide during enrolment, including information about any disabilities or long-term health conditions you inform us about. As you progress through your course, we will collect and use a variety of other information to assist you with your studies, maintain records about your studies and academic achievements, student finance and about your use of the academic and non-academic facilities and services that we offer. Most of this information is usually collected from you directly during your time at UCLan Cyprus.

Students studying at partner institutions

If you are studying at one of our partner institutions in Cyprus/EU, the UK or overseas, you will usually enrol at UCLan Cyprus and at our partner institution. The partner institution will deliver your course and keep records about you. UCLan Cyprus will also keep some records about you as outlined in this privacy notice because we are the awarding body for your course. UCLan Cyprus receives information about you from our partner institution once your application is successful to enable you to enrol and so that we can provide IT and other facilities and services to you, where appropriate. We also receive information throughout your course to enable us to monitor your progress and for internal and statutory reporting purposes. If you declare a disability to our partner institution, they will inform us of this for such monitoring and reporting purposes. We may also receive information about complaints and disciplinary matters, as appropriate.

Why do we use your personal data?

Once you enrol, we use information about you for a variety of purposes. The main purposes are set out below. Depending on the nature of your course or use of University facilities, there may be additional reasons why we use your information which are specific to your course, school or service we offer. You will be informed about these locally as appropriate.

For the administration of your studies

We use your information to deliver and administer all aspects of your education (including any placements with external providers), including for identity verification and visa/immigration checks; teaching, assessment and quality assurance purposes; considering and approving academic progression and managing academic appeals; managing resits; considering any applications for extenuating circumstances; and determining and confirming awards. Where relevant e.g. for PhD students, we monitor, evaluate and support your research activity. We also maintain records of your studies and academic achievements. To provide an enhanced student experience, we may use software to analyse the information we hold within a number of different systems to enable staff supporting your studies to deliver tailored interventions to support you to achieve your learning outcomes.

Financial administration

We will use your information, as provided by you or by funding bodies, to administer all financial aspects of your relationship with us and any funders, where relevant. This includes managing and collecting payments for course fees, student pass, printing fees, bursaries, fines, and other support allowances, as well as for debt recovery purposes in the event money is owed to the University. We may use external debt collection agencies for this purpose.

Operation of the University's regulations, procedures and codes of practice

We will use information about you if you make, or are the subject of, a complaint or allegation involving another student, member of staff or external party under any of the University's rules, regulations, procedures or codes of practice. Information will be used to investigate complaints or allegations, manage the outcomes and put in place any remedies, including additional support or disciplinary measures. This includes investigating cases where the use of unfair means is suspected (which includes suspected plagiarism, cheating or collusion) and fitness to practise cases (where this is relevant to your course).

Security and crime prevention

The University operates a CCTV system for security and crime prevention purposes. This covers University buildings (inside and outside) and public areas across the main campus. Your images are likely to be captured by the CCTV system while you are on, in, or near University premises. CCTV footage will be used to maintain the security of the University community, enhance public safety, prevent and detect crime and apprehend and prosecute offenders. CCTV footage may be used, where there is a lawful basis, in the investigation of complaints and allegations made under the University's rules, regulations, procedures and codes of practice.

The University's Security Team may also use your information to carry out welfare checks, maintain a safe environment around the University campus and University accommodation and investigate complaints or concerns, particularly 'out of hours'.

Some buildings, such as the Library, have security access controls and collect data from your student card to show when you enter and leave.

Delivery of facilities and services

1. We will use your information to provide you with services and facilities such as an IT service, library, accommodation, parking permits, sports centre, clubs and societies (via the Students Council) and a careers service. All students and graduates are automatically eligible to receive ongoing support from the Careers Service. The Careers Service uses your information to provide specialist careers advice, mentoring, help with CV preparation and advertising and informing you of job vacancies.
2. With regards to online live classroom sessions, you will be informed if the online session is being recorded or not prior to the session. If the session will be recorded, the purpose will be for (a) supporting all students of the class to access it and (b) for the use during an audit by the Ministry of Education, Culture, Sports and Youth and by the Cyprus Agency for Quality Assurance and Accreditation in Higher Education. The recorded file will be available only to the students of the particular class, without the ability to download it or edit it, and it will be saved only by the lecturer running the recorded session in a secured drive of the University. The University will retain the recorded material for as long as it is necessary for the completion of its operational, legal and compliance obligations, provided such duration does not exceed six months from the completion of the academic year.
3. In case a physical classroom session is being recorded by UCLan Cyprus, UCLan Cyprus will use the recording for the purposes of supporting students who cannot participate physically at the session and for providing all students enrolled for the session with further support. These recordings will occur via Microsoft Teams and they will be kept for access by the students enrolled for the session and the lecturer, only until completion of the academic year. Once the academic year is completed, the Microsoft Team group for the session will no longer have access to the recorded session and the recorded file will be stored electronically only in a secured location in the University's server for access strictly by authorized University staff (Academic Quality Assurance Department, Head of School, Course Leader and Module Lecturer). Recordings and other information collected from the recorded sessions will also be used for audit purposes by the Ministry of Education, Culture, Sports and Youth and the Cyprus Agency of Quality Assurance and Accreditation in Higher Education. These recorded materials will be deleted once the legal obligations of the University towards the Cyprus Agency of Quality Assurance and Accreditation in Higher Education are completed provided such duration does not exceed six months from the completion of the academic year. The safety measures taken for the protection of the personal data are such that prevent unnecessary and unauthorised access as well as sharing or editing.
4. From time to time you may need to take online exams, which will also be recorded. You will know in advance if the examination will be recorded or not. The purpose of the recording will be for complying with mandatory requirements emanating from supervisory authorities in extraordinary circumstances (like the pandemic). The online exam may be recorded for the

exclusive purposes of (i) invigilation of the exam and (ii) quality audits by the Cyprus Agency for Quality Assurance and Accreditation in Higher Education. In such an event, the recorded file will be accessible through a link which is located in a dedicated space on the e-learning environment of the University (Blackboard), and it has automatic restrictions on any processing (cannot be downloaded or edited). Access is restricted to strictly authorised University staff, specifically to the particular Module Leader, the Examiner and the Academic Quality Assurance Department only. The University will retain restricted and controlled access to the link of the recorded material for as long as it is necessary for the completion of its operational, legal and compliance obligations, provided such duration does not exceed six months from the day of the recorded exam.

Provision of a student wellbeing service

The University offers a variety of support to students via its Student Support and Services team. Student Services uses your information to provide wellbeing support, including counselling and mental health support. It also provides a disability support service. If you declare a disability during the enrolment process or at any other time, unless you are solely studying at one of our partner institutions, the information will be passed to the Senior Support Team who will contact you to discuss your support needs and any reasonable adjustments which may need to be put in place. The team will discuss with you how we might need to share your information to put reasonable adjustments in place and you will be given the option to say that you want information about your disability to remain confidential.

Communicating with you

We will use your information to communicate effectively with you via email, post, telephone, text (SMS), social media or other methods, as appropriate. We will send you messages about a variety of things such as the administration of your course, timetable changes and events and activities happening at the University. We will also keep you informed of important updates using newsletters, circulars or other methods. We may also send you messages about University services and facilities.

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.

Providing an alumni service

When you graduate, you automatically become an alumnus and will be provided with information about the University's alumni service. We will use information about you to offer you an alumni service, which includes keeping you informed of University news, publications and events, career opportunities, academic and professional development opportunities and much more. Further information is available in the Alumni Privacy Notice here <https://www.uclancyprus.ac.cy/data->

[protection-policy/](#). You can opt out of receiving communications from the alumni service at any time by contacting the Alumni team.

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)(a) which allows us to process your data only when you give us your written consent which you can withdraw at any time.

Article 6(1)(b), which allows us to process personal data when it is necessary for the performance of a contract. You enter into a contract with us when you accept an offer of a place (the student 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 these purposes otherwise we cannot deliver 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 teaching 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:

- deliver some services and facilities to you such as the Careers Service and the alumni service. It is in the interests of you, our student, to have access to careers advice to help you plan for your future and secure employment, and to be provided with other beneficial services as part of your University experience, to help you get the most out of your time at UCLan and achieve the best academic result you can.
- provide a security service and CCTV monitoring. It is in the interests of the University community and the general public to make UCLan a safe and secure place to live and study.
- 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.
- share information with third parties for your benefit, or where it is in their interests, for example where your employer is paying for your course and enquires about your attendance or attainment.

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 a

positive action proving the 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:

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.

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. The law which allows us to rely on this basis is **section 10 DPA** by virtue of **Schedule 1(4) DPA**.

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 in 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.
- **UCLan Cyprus Student Council (SC)**: you automatically become a member of the SC once you enrol at UCLan Cyprus. We share some information with the SC for membership purposes to enable it to verify your eligibility to join clubs and societies and vote in elections, and to contact you with essential updates. You can opt out of this process by emailing studentcouncil@uclancyprus.ac.cy
- **External educational providers and work placement sites** if this is relevant to your course. Your name, course and other relevant details will be shared to facilitate your placement and to provide and monitor mentoring support. Information shared may include details of any disability you have declared to enable reasonable adjustments to be put in place.
- **Professional and regulatory bodies** if this is relevant to your course. Information is shared for 'fitness to practise' purposes, to confirm your qualifications and for the accreditation of courses, among other things.
- **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 e.g. in relation to your attendance, progress or final qualification.

- **Your employer:** Where you are employed by a third party during your time here and your employer has a direct interest in your status as a student here e.g. they are paying for your course, we may disclose information to them such as details of your attendance and performance.
- **Unfair means services:** to identify plagiarism and other uses of unfair means, we share information with a service called Turnitin, which is based in the USA. We have a contract in place with Turnitin to ensure your information is protected.
- **External debt collection agencies** to recover unpaid debts owed to us.
- **University insurers:** information, including accident forms, is shared with our insurers to provide insurance cover for trips abroad and to enable us to make insurance claims.
- **Your main education provider** if you are an exchange student. This may include any information about attendance and disciplinary matters.
- **Partner institutions** where you study at a EU/UK or overseas partner institution and we are the awarding body for your course.
- **External examiners and assessors** for assessment and examination purposes.
- **Companies or organisations acting on our behalf:** We use data processors who are third parties who provide elements of services for us. 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 enable you to participate in an exchange visit or field trip; so that we can report to an overseas funding provider; to communicate with our partner institutions; or obtain a service from a data processor. These transfers are usually carried out with your consent or because they are necessary for us to deliver 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?

We will maintain your full student record for six years after you have left the University. If you are studying on certain courses, we are legally required to keep your information for longer than this. You will be informed if you are on such a course.

Six years after you leave the University, the majority of your information will be deleted but we will keep indefinitely information which is necessary to confirm that you studied here and the qualification and grade you obtained. If you are part of our Alumni Network, we will retain additional information related to the Alumni Network.

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. Further information about each of these rights can be found on the Data Protection Commissioner's website.

Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. For further information or to make a request, please see our data privacy policy at our website <https://www.uclancyprus.ac.cy/data-protection-policy/>.

Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing

You have the right to object to any processing we carry out, if we carry it out on the basis that it forms part of our public task or is in our legitimate interests. You also have the right to object to your personal information being used for direct marketing purposes.

Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information because we have your consent or because it is necessary for your student contract, and the processing is automated.

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), and we will respond.

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 Personal Data Protection
1 Iasonos str.
1082 Nicosia
Cyprus
Telephone number: 22818456
Fax number: 22304565

To learn more about how we use your information and/or be provided with the Data Subject Right Request Form please contact our Data Protection Officer at DPO@uclancyprus.ac.cy.