

## **Privacy Notice for Students and Prospective Students**

London School of Economics & Political Science (“LSE”, “School”, “We”, “Our”, “Us”). LSE is one of the world’s leading social science universities. We are committed to a strategy that will build on our strengths, address challenges and maintain our worldwide reputation for excellence. LSE offers a range of different programmes, from undergraduate and graduate study, to executive education, distance learning, language study, summer school and study abroad options. Further information can be found in the [Study at LSE](http://www.lse.ac.uk/) section of our main website at <http://www.lse.ac.uk/>.

This Privacy Notice explain how LSE processes the personal data of our students and prospective students and your rights in relation to the personal data we hold. It sets out the obligations of LSE, a private company limited by guarantee, registered in England under company number 70527, whose registered office is at Houghton Street, London WC2A 2AE, UK.

For the purposes of any applicable data protection laws in England and Wales, including the General Data Protection Regulation 2016/679 (**GDPR**), the School is the data controller of your personal data. The School **Data Protection Officer is Rachael Maguire**, who can be contacted via email at [glpd.info.rights@lse.ac.uk](mailto:glpd.info.rights@lse.ac.uk) , via telephone on +44 20 7849 4622 and you can write to us at the above address.

### **What is personal data?**

The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

### **LSE data protection obligation**

LSE will use the personal data you provide, as well as personal data for which you have given consent for us to receive (e.g. from UCAS or SLC data) to process your application and enrolment.

In accordance with the General Data Protection Regulation (GDPR), Data Protection Act 2018 (“DPA”) and any data protection legislation enacted in the UK, we are the data controller of your personal data and this means that we are legally responsible for the personal data we collect and hold about you. One of our responsibilities is to tell you about the different ways in which we use your personal data – what information we collect, our legal basis for doing so, why we collect it, where we collect it from and whether and with whom we will share it. We also need to tell you about your rights in relation to your personal data. In addition to the information in this statement, you may be given further information about the uses of your personal data when you sign up to use specific services and facilities we offer, and in certain situations, you may be asked whether you give your consent to us processing information about you.

### **We may collect information about you through your application and enrolment**

In addition to the data you have provided in your application, we will collect and process the following information about you:

- Name
- Date of birth (age)
- Address history
- Proof of Identity (e.g. passport)
- Contact Info (Address, Phone, Email etc.)
- Fee Status (e.g. home, EU or overseas)
- Nationality / Place of Birth / Domicile
- UKVI Confirmation for Acceptance to Study/Visa/Biometric Residence Permits
- Academic Technology Approval Scheme
- Date of Entry to the UK
- English / Literacy / Numeracy proficiency
- Student status (e.g. 'offer', 'accepted' etc.)
- Qualification Information (provided by you and external bodies e.g. UCAS)
- Marks / Awards / Course
- Information about your career aspirations and work experience
- Programme
- Fees/ Payment Info/ Student Funding/ Finance information (including sponsor details)
- Next of kin / guardian / family etc. data
- Reference / Referee data
- Statutory checks
- Photograph
- Parental Higher Education
- Bank account information – please note credit/debit card information is not processed by the School but by third party processors with PSS-DCI compliance.

Sensitive or special category data we may also process includes;

- Ethnicity
- Occupational and other health data
- Overseas police check
- Trade union membership
- Geodemographic Information
- Disability
- Criminal convictions
- Religious or other similar beliefs
- Sexuality

Information we collect about you. Both your image and voice may be recorded during our use of Lecture cast (our system for recording lectures and making them available online) as specified **on lecture cast page** and at teaching locations across the LSE campus. In accordance with our **CCTV Policy**, we may also capture your image on CCTV whilst you are on our premises.

➤ **Information we receive from other sources**

We work closely with third parties including, for example, funding and sponsorship partners, educational institutions, examination boards, overseas agents, UCAS, and clearing houses, business

partners and compliance services e.g. UKVI, Disclosure and Barring Service and may receive information about you from them if you have provided specific consent to this sharing of your personal data in your agreements with those third parties. If you have provided such consent, we may receive any of the following information from third parties: examination or test results, evidence of sponsorship (e.g. scholarship, bursary, and loan etc.), updates on your CAS status (Confirmation of Acceptance for Studies), DBS certificate number and other information in connection with your LSE activities.

#### ➤ **The use of Cookies and other technologies**

We will also collect personal data about website usage through cookies which is a small file of letters and numbers that is stored on your device. Our website uses cookies to distinguish you from other users of the website. The cookies set may obtain information about you, how you use the website and any other information you post, email or otherwise send to us. Your computer IP address, operating system and browser type, your use of our website and your general internet usage.

For more information about our use of cookies and similar technologies to allow you to browse our website effectively, see our [cookie page](#). You can also see [Google Analytics Privacy Policy](#) and how google [safeguard your data](#).

#### **Legal basis for processing personal information**

Data Protection Laws require that we meet certain conditions before we are allowed to use your data in the manner described in this notice, including having a "legal basis" for the processing. We take our responsibilities under Data Protection Laws extremely seriously, including meeting these conditions. The legal bases on which your personal data are collected are explained below.

- **Consent:** We may ask you to provide us with special category or sensitive personal data as detailed above which we will agree only to process with your express consent.
- **Performance of contract:** The processing of your personal data may be necessary in relation to the contract we have entered into with you to provide LSE's services to you or because you have asked for something to be done so you can enter into such contract.
- **Legal reasons:** We are required to process data relating to visas and related immigration issues.
- **Vital interests:** We will process data relating to next of kin details provided by you when we believe it is absolutely in your interests to do so, for example, if you are hospitalised.
- **Public interest:** The processing of your personal data may be necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us;
- **Legitimate interests:** The processing of your personal data may be necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or by fundamental rights and freedoms which require protection of personal data. It may be necessary for our legitimate interests to collect your personal data to enable us to manage certain operations of the School effectively.
- **Social protection law:** We will process data relating to equity and diversity as required and in accordance with your fundamental rights as a data subject.
- **Substantial public interest:** processing is necessary for reasons of substantial public interest, ... which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

When we use your data to compile statistics and conduct research, we usually use anonymised data from which you cannot be identified, but where that is not possible, we do so on the basis that this is necessary. For more information on the use of data for research purposes, see our **Research privacy page**.

### **Purposes for which we process your personal data**

We will combine the information we received from other sources with information you give to us in your application and process for the following purposes:

- To process your application to study with us and create a student application record on Student management System (SITS)
- To form a decision about your application with a view to accepting or rejecting your application.
- To provide you with information relating LSE services including its facilities and the local area, to help you make an informed decision as to whether to apply to study with us
- To invite you to attend relevant events (such as Open Days)
- To keep our campus safe and enhance the security of our network and information systems
- To support your academic studies, and those of other students
- To administer the financial aspects of your relationship with us and any funders/sponsors
- To enable tailored communications with you based on your postcode, domicile, achieved and predicted academic qualifications, your subject(s) of interest etc.
- For the direct marketing of LSE products and services
- To determine the effectiveness of promotional campaigns and advertising
- To support your training, health, safety and welfare requirements, including sharing necessary information with appropriate third parties such as your family or the police in circumstances where it is in your vital interests
- To facilitate your education, record the details of your previous academic studies (including any placements with external organisations) and determine your examination achievements
- To allow your achievements via the LSE to be accredited, for example by inclusion in the Higher Education Achievement Report and LSE Digest
- To manage your use of facilities and participation at events (e.g. computing, libraries, accommodation, functions, graduation, careers etc.)
- To administer complaints and disciplinary proceedings that you are involved in
- To produce statistics and research for internal and statutory reporting purposes
- To audit the quality of teaching programmes and to facilitate surveys relating to teaching
- Following your graduation, your personal data will be automatically transfer from SITS to PAGE, to keep you in touch with LSE and the Alumni Network. Further details about how Alumni may use your data can be found on [PAGE's privacy statement](#).

### ➤ **Special category personal data**

We will use your special category personal data about your physical, mental health or disability where you choose to provide these details to us **for the purpose of providing reasonable adjustment relating to a disability, for example, to help with attendance at an open day or entrance tests, to meet special accommodation requirements or to support your study at LSE including our mitigating circumstances procedures and occupational health assessment.**

In some cases, personal data about past criminal convictions may be processed for certain courses of study because you will be working with children or vulnerable adults, and/or because of fitness to practise requirements in certain regulated professions. Where these details are required you will be provided with further information.

We may also need to process special categories data for complaints and disciplinary purposes.

While the Covid-19 epidemic continues, we will also be processing data for track and trace purposes.

### **Who will your personal data be shared with**

Your personal data is shared as is necessary, on a considered and confidential basis, with relevant staffs of LSE and several external organisations which assist the School with handling enquiries and student applications and with sending you information about studying here. These organisations act on our behalf in accordance with our instructions and do not process your data for any purpose over and above what we have asked them to do.

- We may share your personal information with third parties (including your school/college, partner(s) with whom we may have collaborated to organise and/or evaluate events, the Universities and Colleges Admissions Service (UCAS), the Higher Education Statistics Agency (HESA), the Department for Education.
- If you undertake a placement or complete a period of study with a third party organisation or institution in the UK or in another country, personal data relating to you may be shared with the partner organisation/institution for the purposes of administering the placement. Sensitive personal data relating to your health or a disability will not be shared without your express consent unless required by law or in your vital interests in an emergency situation.
- We may also share with your funders and/or sponsors as relevant, for example, the Student Loans Company, LSE Scholarships, European and International Trust, Research Councils, the funders of any awards or prizes.
- Relevant executive agencies or non-departmental public bodies (e.g. UK Visas and Immigration, HM Revenue and Customs, the Health and Safety Executive)
- Sometimes your personal data is processed by these organisations outside the European Economic Area (e.g. because they use a cloud-based system with servers based outside the EEA or to facilitate your participation in an exchange visit or to report to an overseas funding provider), and if so, appropriate safeguards are in place to ensure the confidentiality and security of your personal data.
- We may use information which we hold about you to show you relevant advertising on third-party sites (e.g. Facebook, Google, Instagram, and Twitter). If you do not want to be shown targeted advertising messages from LSE, some third-party sites allow you to request that you do not see messages from specific advertisers on that site in future.
- We will not disclose any other personal information about your application to other external enquirers or organisations without your consent unless it is in your vital interests to do so (e.g. NHS services in circumstances relating to your vital interests).
- Statements of student status will be provided on request to Council Tax Registration Officers to assist with the administration of students' exemption, to debt collection agencies acting on our behalf in the event that you owe money to us etc.
- Student's Union ([LSESU](#)) is a separate legal entity so they have their own responsibility when it comes to collecting and using personal information. The School has a data sharing agreement with LSESU which provides them with personal data about the School's students so you do not have to register separately with them. This also covers specific cases relating to

complaints and disciplinary matters. Please let either us know if you do not want us to transfer your data to the LSESU.

- Where a programme of study leads to a qualification recognised by a professional body we will disclose relevant information to that body (e.g. Law Society).

We do our utmost to protect your privacy. Data Protection Legislation obliges us to follow security procedures regarding the storage and disclosure of personal information in order to avoid unauthorised loss or access. As such we have implemented standard security systems and procedures to protect information from unauthorised disclosure, misuse or destruction. We have established 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.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. If we need to transfer any information to a country not recognised as providing equivalent protection, we will use additional safeguards approved by UK or EU regulators. We do not allow our service providers to use your personal data for their own purposes – we only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Principle of processing your personal information**

We will handle your personal data in accordance with the principles set out below.

<b><u>Principle</u></b>	<b><u>Personal Data shall be:</u></b>
<b>Integrity and confidentiality</b>	Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
<b>Lawfulness, fairness and transparency</b>	Be processed lawfully, fairly and in a transparent manner in relation to the data subject.
<b>Purpose limitation</b>	Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
<b>Accuracy</b>	Accurate and, where necessary, kept up to date.
<b>Storage limitation</b>	Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
<b>Data minimisation</b>	Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
<b>Accountability</b>	Be able to demonstrate compliance with the above principles

## **Your rights**

Under certain circumstances, by law you have the right to which we will always work to uphold:

- **The right of access.** This enables you to request a copy of your data we hold about you and to check that we are lawfully processing it.
- **The right to rectification.** If any of your personal data held by us is inaccurate or incomplete, this enables you to ask us to make correction as deem fit.
- **The right to erasure.** This enables you to ask us to delete or remove your data where consent has been withdrawn and there are no other legal grounds for the processing.
- **The right to object.** You can object the processing of your data where we are relying on our compelling legitimate interests. You also have the right to object where we are processing your data for direct marketing purposes and profiling.
- **The right to restrict processing of your data.** This enables you to ask us to suspend the processing of your data or stopping further processing where there is no further legitimate ground to continue processing it.
- **The right to data portability.** This means that, if you have provided personal data to us directly and we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data in a machine-readable format to re-use with another service.
- **Rights in relation to automated decision making and profiling** – Rights not to be subjected to a decision based solely on automated processing and profiling.

Please keep in mind that there are exceptions to the rights above, there may be situations where we are unable to do so depending on the circumstances and the nature of your request. It may not be possible for us to do what you have asked, for example, where there is a statutory or contractual requirement for us to process your data, it would not be possible to fulfil our legal obligations if we were to erase your data. However, where you have consented to the processing (for example, where you have asked us to contact you for marketing purposes), you can withdraw your consent at any time by completing our [Data Protection Form](#) and email it to us at [glpd.info.rights@lse.ac.uk](mailto:glpd.info.rights@lse.ac.uk) or by clicking the unsubscribe button on the marketing page. In this event, we will stop the processing as soon as we can. However, this will not affect the lawfulness of any processing carried out before your withdrawal of consent. The same form can be used to exercise any of the rights.

## **Offensive or inappropriate content on LSE websites**

We may remove any content post or send which may reasonably be deemed to be offensive or inappropriate anywhere on or to LSE websites or social media channels, or otherwise engage in any disruptive behaviour on any LSE service, we may remove such content.

Where LSE reasonably believes that you are in breach of any applicable laws, we may disclose your personal information to relevant third parties, including law enforcement agencies or your internet provider. LSE would only do so in circumstances where such disclosure is permitted under applicable laws, including data protection law.

### **Data Retention**

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, and in accordance with [LSE Retention Schedule](#) under our Information and Record Management page unless stated otherwise in a privacy notice.

### **Marketing**

When you register an interest with the school or through one of our service providers, we may ask you to **Opt-In** to receive marketing services via your preferred communication channels. We will also make provision for a simple and clear way to unsubscribe at any time. We also send regular emails to let you know about our products and services and to inform you of the latest LSE research and insights. We may also invite you to take part in surveys about our products and services or matters concerning LSE.

### **Changes to Our privacy notice**

We keep our Privacy Notice under regular review and may be updated from time to time. Any updates will appear on this webpage. This notice was last updated in August 2018.

### **How to contact us or make complaint to the regulator**

If you want to exercise any of the rights described above or are unhappy with the way we have used your information, you should contact the School Data Protection Officer, **Rachael Maguire** at [glpd.info.rights@lse.ac.uk](mailto:glpd.info.rights@lse.ac.uk). We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR and related Data Protection Legislation. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

If you are dissatisfied with our response, or you believe that your data protection or privacy rights have been infringed, you should contact the UK Information Commissioner's Office (ICO), which oversees data protection compliance in the UK. Details of how to do this can be found <https://ico.org.uk/make-a-complaint/>.