

## Student and Prospective Student Privacy Notice

Université Paris Dauphine – PSL, London campus is committed to protecting the privacy and security of your personal information.

This Student and Prospective Student Privacy Notice describes how we collect and use personal information in compliance with the data protection legislation: The UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018 and General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and the Data Protection Act 2018.

This notice applies to all current, prospective, and former London campus students.

### 1. GENERAL INFORMATION

The data controller is: Université Paris Dauphine – PSL, London campus (we, our, London campus). This policy relates only to processing operations for which Université Paris Dauphine – PSL, London campus is responsible for.

The processing of personal data may be managed directly by Université Paris Dauphine – PSL, London campus or through a subcontractor specifically designated by us.

This policy is complementary with any other regulation and charter that may apply within Université Paris Dauphine – PSL, London campus, specifically its Data Protection Policy.

### 2. DATA PROTECTION PRINCIPLES

We will comply with data protection legislation, which requires that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely

### 3. THE TYPES OF DATA WE HOLD ABOUT YOU

In the context of the application platforms used, this processing is mandatory in accordance with our application procedures.

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We may hold the following categories of data, although this will not be the same for each student:

- Personal details including: name, title, date of birth, sex and gender identity, address, telephone and email, nationality, photos;
- Identification data such as passport number and application number (Parcoursup, MyCandidature, Formsite etc.) or student number
- Education and employment information: including schools, colleges or universities you have attended, the courses completed and examination results and other information in your student record; employment history and references
- Other personal information collected during the admissions process, e.g. your extracurricular activities, responsibilities
- Visa and immigration information
- Connection data (IP address, logs, etc.).

We may also hold additional information when you study with us, such as:

- Fees and financial support record, including bursary or scholarship applications (within this process we may ask for personal information regarding household income and family circumstances)
- information concerning your health and medical conditions
- personal and confidential information, such as your ethnicity, religious beliefs, sexual identity, sexual orientation etc. (data we are required to collect in order to be compliant with the Office for Students)
- Emergency contact information
- Socio-economic background information, e.g. details of parents/carers occupation, Crous bursary, UK or international equivalent
- Records of teaching, learning and tutorial activities, including online engagement (with tools such as Microsoft Teams, Virtual Learning Environment (VLE) Moodle) and grades, assessments and final exams
- Feedback on surveys
- Information about your involvement in any campus disciplinary procedure, academic appeals, complaints, fitness to study

## 4. PURPOSES

### 4.1. Prospective students

The Université Paris Dauphine – PSL, London campus processes your data as part of its contractual obligation to consider your application:

- Processing and assessing your application/query
- Where you have given permission, to communicate additional information
- Provide information to government departments, through HESA ([Higher Education Statistics Agency](#)) to comply with our legal obligation

### 4.2. Students

We will process your personal data for the purpose of providing you with relevant services, such as:

- Teaching, learning and academic assessment

- Student welfare and wellbeing in line with our welfare and wellbeing policy
- Allow the student to access the VLE, which includes access to course resources, online library and further online documentation;
- Provide the student with a student card allowing them access services implemented by Université Paris Dauphine – PSL, London campus
- Managing the campus procedures, including those in relation to appeals, special needs support, fitness to study, extenuating circumstances, attendance and complaints
- Allow consultation of the student's educational file
- Provide information to government departments, through HESA to comply with our legal obligation
- Retention of student records.

## 5. SHARING OF YOUR DATA

Université Paris Dauphine – PSL, London campus ensures that the data is only accessible where necessary or at your request, to authorised internal or external recipients, such as:

- Université Paris Dauphine – PSL
- UK partner higher education institutions where relevant
- Local authorities to facilitate Council Tax exemption
- TFL to facilitate discounted travel
- Student Union to activate membership
- Your funders, including the Student Loan Company
- The Higher Education Statistics Agency (HESA) uses your data to provide information on higher education and shares your data with public authorities to carry out statutory or public functions. Further information is available from the HESA website
- Office for Students (OfS)
- National Student Survey (NSS)
- Office of Independent Adjudicator
- Relevant public bodies, e.g. the UK Home Office
- Employment or educational providers you have approached in order to confirm your qualifications or study
- Other third parties at your request
- Other third parties where it is in your interest, we may request confirmation prior to supplying data
- We may also share your data with a third party where it is necessary to protect your vital interests or those of another person.
- We display university email address for ambassadors in internal communications, and where agreed via email
- Processing of personal data for the Prevent duty is necessary to meet our legal obligation as set out in Section 26 of the Counter Terrorism and Security Act 2015. This legislation places a statutory duty on specified authorities to have 'due regard to the need to prevent people from being drawn into terrorism'. The appropriate lawful basis under the GDPR is Article 6(1)c – Legal obligation.

### 5.1. Transferring your information outside of the United Kingdom or European Economic Area (EEA)

We may need to transfer your personal information outside of the UK or EEA in order to provide you with the services and products you require or as necessary. Any such transfers are carried out with appropriate safeguards in place to ensure the confidentiality and security of your personal information. 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.

## **6. KEEPING YOUR DATA UP TO DATE**

It is important that the data we hold about you is accurate and current, it is your responsibility to ensure that your personal data is up-to-date.

## **7. RETENTION PERIOD**

We will retain your data only as needed with regard to any legal, contractual or internal requirements and constraints.

Details of retention periods for data held are available in our Data Retention Guideline, after these periods the data will be deleted or may be kept after being anonymised, e.g. for reasons of statistical use.

## **8. DATA SECURITY**

It is the responsibility of Université Paris Dauphine – PSL, London campus to define and implement the technical measures and physical processes which it deems appropriate to fight against the destruction, loss, alteration or unauthorised disclosure of data in an accidental or illicit way.

To do this, Université Paris Dauphine – PSL, London campus can be assisted by any third party of its choice to carry out as it deems necessary, vulnerability audits or penetration tests. The central services of the Université Paris Dauphine – PSL provides IT safety services to the London campus.

In the event of a change in the means to ensure the security and confidentiality of personal data, we undertake to replace them by means of equal or superior performance. No development can lead to a reduction in the level of safety.

In the event of subcontracting of part or all of a processing of personal data Université Paris Dauphine – PSL, London campus undertakes to contractually impose on its subcontractors security guarantees through technical measures and human means for the protection of such data.

All third-parties are required to take security measures to protect your personal data.

## **9. DATA BREACH**

In the event of a personal data breach, Université Paris Dauphine – PSL, London campus undertakes to notify the relevant authority, in most cases, the UK's supervisory authority; the Information Commissioner's Office (ICO). If the data breach affects the Université Paris Dauphine – PSL, as a joint controller, the London campus will inform as soon as possible the Université's DPO. The Université's DPO will notify the French supervisory authority; the CNIL (Commission Nationale de l'Informatique et des Libertés). If the said violation is of a nature that is high risk for students and the data has not been protected, Université Paris Dauphine – PSL, London campus will:

- Notify the persons concerned;
- Provide the persons concerned with the necessary information and recommendations.

## 10. YOUR RIGHTS

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.
- Withdraw your consent, where we rely on your consent to use your personal information.

For further information on your rights or to exercise your rights, you can contact our Data Protection Officers (DPO) by email at [dauphinelondon@dauphine.psl.eu](mailto:dauphinelondon@dauphine.psl.eu) or by post to: Data Protection Officer, Université Paris Dauphine – PSL, London campus, 46-52 Pentonville Road, N1 9HF, London. Information about your rights is also available from the [Information commissioner's Office \(ICO\)](#)

We aim to respond to any request, where we are able to, within a reasonable time and in line with GDPR guidance. Should you be dissatisfied with the London campus' response, please contact the DPO in the first instance, or you can escalate your complaint using our [Appeals and Complaints policy](#)

## 11. RIGHT TO LODGE A COMPLAINT WITH THE ICO

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK's supervisory authority for data protection issues.

## 12. CHANGES TO THIS NOTICE

This policy may be modified at any time, in the event of legal changes, or on the decisions and recommendations of the ICO.