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GBS Privacy Policy

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Document title	GBS Privacy Policy
Version	V2.4
Approved by (Oversight Committee)	Board of Directors
Policy lead (Staff member accountable)	General Counsel
Date of original approval	May 2018
Date of last review	December 2024
Changes made at the last review:	Minor editorial changes (December 2024)
Date effective from	December 2024
Date of next review	January 2027

Related policies

- GBS Data Protection Policy
- GBS Data Subject Access Request Policy
- GBS Access Control Policy
- GBS ICT Policy
- GBS Email Usage Policy
- GBS CCTV Policy and Procedure

External Reference

1. Information Commissioner's Office, Accessed online at: <https://ico.org.uk/>
2. UK Public General Acts, *Data Protection Act 2018*, Accessed online at: <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
3. [The Data Protection, Privacy and Electronic Communications \(Amendments etc\) \(EU Exit\) Regulations 2019](#)

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1. Introduction

- 1.1. Global Banking School (GBS) needs to collect, store and process personal data about its staff, students, and other individuals it has dealings with, to carry out our functions and activities. GBS is a controller for most of the personal data it processes and is committed to full compliance with the applicable data protection legislation including The Data Protection Act 2018, as amended, and the United Kingdom General Data Protection Regulation (UK GDPR) 2020. This policy sets out how GBS ("we", "our", "us") handle the personal data of our staff, students, suppliers, partners, and other third parties.
- 1.2. GBS gathers and processes your personal information in accordance with this privacy policy. This policy provides you with information regarding your rights and our obligations, and explains how, why, and when we process your personal data and how we are keeping it safe. Please use the Glossary at the end of this document to understand the meaning of some of the terms used in this privacy policy.
- 1.3. GBS is responsible for your personal data, and we have appointed a Data Protection Officer (DPO) who oversees privacy related matters. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.
- 1.4. 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.
- 1.5. **CONTACT DETAILS:**
 - Full name of legal entity: Global Banking School Limited
 - Email address of DPO: dpa@globalbanking.ac.uk
 - Registered Address: 891 Greenford Road, Greenford, London, United Kingdom, UB6 0HE

2. Information that we collect.

- 2.1. GBS processes personal information to meet our legal, regulatory, statutory, and contractual obligations and to provide you with information, either about our products and services or about matters of public interest. We will never collect any unnecessary personal data from you and will not process your information in any way other than as specified in this policy without telling you first. We do not knowingly collect data relating to children and our websites are not intended for children.

- 2.2. 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 or transfer different kinds of personal data about you which we have grouped together as follows:
 - 2.2.1. **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

 - 2.2.2. **Contact Data** includes billing address, delivery address, email address and telephone numbers.

 - 2.2.3. **Financial Data** includes bank account and payment card details.

 - 2.2.4. **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.

 - 2.2.5. **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 our websites.

 - 2.2.6. **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.

 - 2.2.7. **Usage Data** includes information about how you use our website services.

 - 2.2.8. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

2.2.9. **Special Categories of Personal Data** includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, criminal convictions and offences, information about your health and genetic and biometric data.

2.2.10. 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.

2.3. GBS collects information from the following:

- Visitors to our website
- Enquiries, visitors, and survey respondents, namely:
 - People who email GBS or fill in our forms
 - People who call GBS
 - People who contact GBS via social media
 - People who respond to a GBS Survey
 - Visitors to our office
- Current and former student details, including when they apply for a course at GBS, enrolment information, and progression through the course.
- Data received from other students or external sources such as UCAS and external referees.
- GBS staff, board members, contractors, volunteers, and people who apply to work with us.
- GBS suppliers and partners who we enter into or negotiate agreements with.

2.4. You do not have to create an account or provide us with any personal information when you access the GBS website. We may ask you for some personal details if you access some of our services, for example:

- To order a prospectus

- To register for an event such as an open day
 - To make an enquiry
- 2.5. If you use one of our website forms or if you contact us by email, we may collect and process personal information about you. This may include:
- Your contact details including your address and phone number.
 - Your name, title, date of birth and gender
 - Your email addresses.
 - Education or professional details
 - Attendance at GBS events
- 2.6. We may automatically collect certain data from you as you use our website, by using cookies and similar technologies.
- 2.7. We may receive data from third parties such as analytics providers such as Google, advertising networks, providers of technical, payment and delivery services, such as data brokers or aggregators.
- 2.8. If you do not provide us with data when requested to perform our contractual obligations, under the terms of the contract between us and you, we may not be able to fulfil our contract. In these circumstances we may have to cancel your service, but if we do, we will notify you at the time.
- 2.9. 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.
- 3. How we use your personal data**
- 3.1. GBS takes privacy seriously and will never disclose, share, or sell your data without your knowledge. We may process your personal data without your knowledge or consent where this is required or permitted by law.
- 3.2. We will only use your data for the purposes it was collected for, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for in unrelated purpose, we will seek your consent to use it for that new purpose.

4. Purposes for which we will use your personal data.

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

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you on our systems when you are applying for one of our courses or enter contractual relationship with us.	(a) Identity (b) Contact	Performance of a contract with you.
To process your order, comply with our contractual obligations towards you and deliver services to you including: (a) Manage payments, fees, and charges. (b) Pay money to you, collect money from you and recover money owed to us. (c) Maintain records of academic progress, achievement, awards, and incidental records during the course of our contractual relationship with you.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Academic Data (f) Incidents and Health and Safety Data	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to recover debts due to us).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy. (b) Asking you to leave a review.	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you. (b) Necessary to comply with a legal obligation.

	(d) Marketing and Communications	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our 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	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to study what courses students apply for, to develop them and grow our business). (c) consent (where results of a survey are analysed outside the UK/EEA).
To manage, administer and protect our business (including legal and accounting support, investments, and leverage) and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (c) Technical	(a) 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). (b) 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 services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our services, including enhancing existing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our

<p>services and developing new features, marketing, customer relationships and experiences.</p>		<p>services, to keep our websites updated and relevant, to develop our business and to inform our marketing strategy).</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you, including goods and services of our partners.</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop our services and grow our business).</p>

- 4.3. Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to analysing results of surveys which are processed outside the UK/EEA.
- 4.4. **Marketing.** We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. 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 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 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.
- 4.5. **Third-Party Marketing.** We do not share your personal data with any company outside our group for marketing purposes.
- 4.6. **Opting out.** You can ask us to stop sending you marketing messages at any time by contacting our DPO on dpa@globalbanking.ac.uk. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

5. Disclosure of your Personal Data

5.1. We may have to share your personal data with the parties set out below:

5.2. **External third parties**, such as:

- Service providers who provide IT and system administration services, marketing, and delivery services.
- Professional advisers including lawyers, bankers, auditors, and insurers.
- Partner institutions.
- Government bodies that require us to report processing activities.
- Regulators.
- We may also share your personal data with third parties if we are under a duty to disclose or share your personal data to comply with any legal obligation, to enforce or apply our site terms of use or to protect the rights, property or safety of our site, our users, and others.
- 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.

5.3. **Internal third parties**, such as other companies in the group acting as joint processors and who provide HR, IT, administration, financial services and undertake leadership reporting.

6. International Transfers.

6.1. We may need to share your data with our group companies, partners, or providers, who are based outside the UK/EEA. This will involve transferring your data outside the UK or the European Economic Area (**EEA**) where existing laws do not provide the same level of protection for the security of your personal data. However, we require all involved parties to respect the security of your personal data, and to treat it in accordance with principles of confidentiality as specified at 7. below.

6.2. You have the right to withdraw consent to the data transfer outside the UK/EEA at any time by contacting our DPO on dpa@globalbanking.com. Please note, that if you withdraw your consent to the transfer of your data outside the UK/EEA, we may not be able to perform the contract we have or are trying to enter into with you (for

example, to provide services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

- 6.3. Please, note that some of our surveys are currently processed outside the UK and the European Economic Area (EEA). We will secure your express opt-in consent where necessary before you take any of those surveys.
- 6.4. Please, contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK/EEA.

7. Data Security

- 7.1. We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also only allow access to your personal data to employees and contractors that have a business requirement to process your personal data. They will only process your personal data on our instruction, and they must keep it confidential.
- 7.2. We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach.
- 7.3. Where your data is shared with third parties, we will seek to share the minimum amount of data necessary, and 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 data for specified purposes and in accordance with our instructions.
- 7.4. Whenever we transfer your data to the internal third parties, we have put in place the same safeguards that guaranty the security of your data within our organisation.
- 7.5. Where we share your data with partners or providers, there is a contract in place which includes obligations in relation to the confidentiality, security and lawful processing of any personal data shared with them.
- 7.6. Whenever we transfer your data outside the UK/EEA, the security of your data is protected by international data transfer agreements approved by the regulator that provide the same level of protection afforded in the UK/EEA.

8. Data Retention

- 8.1. We will retain your information for as long as necessary to provide you with the services that you have requested from us or for as long as the law otherwise permits.
- 8.2. 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.
- 8.3. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax and legal purposes. Academic regulations require us to keep some data relating to students' activities for 10 years and some data indefinitely.
- 8.4. In some circumstances you can ask us to delete your data: see *Your right to the information we hold about you* below for further information.
- 8.5. 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.

9. Your rights to the information we hold about you.

- 9.1. Under data protection laws you have rights in relation to your personal data that include the right to access, correction, erasure, and transfer of your data, as well as the right to impose a restriction on or object to the processing of your data. Finally, you have the right to data portability and the right to withdraw consent to data processing. Please, use the Glossary at the end of this document to help you understand the scope of your rights. If you wish to exercise any of the rights set out above, please contact our Data Protection Officer on: dpo@globalbanking.ac.uk
- 9.2. You have the right to see the personal data that we keep about you, by making a request in writing to us at dpo@globalbanking.ac.uk. You will not have to pay a fee to access your personal data (or to exercise any of other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive or refuse to comply with your request in these circumstances. We aim 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 many requests. In this case, we will notify you.

- 9.3. If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would be grateful if you would contact us first if you do have a complaint, so that we can resolve it for you informally.

10. Student Responsibilities

- 10.1. Throughout the course of your studies, you have a responsibility to keep your personal details up to date. You can update your details by sending the email to your Student Success Tutors or the admissions team.
- 10.2. During your time as a student, you may have access to other individuals' personal data, and you are legally obliged to handle this in a confidential, professional, and responsible manner, in line with data protection legislation, this Privacy Policy, and any other codes of conduct.
- 10.3. If you are made aware of an individual's personal information, then you are expected to keep this confidential and to not tell anyone without the individual's prior consent (unless this is required by law). You should also not seek to actively obtain another individual's personal information to which you are not entitled. In the instance where data protection legislation or a duty of confidence has been breached, disciplinary action will be considered.

11. Use of Technology Platform

- 11.1. The website uses Google Analytics technology which may collect non-personally identifiable information relating to your use of the site. This may include:
- Which pages you see.
 - How long you stay.
 - What you click on our pages
 - If you visit the website again
 - Which country and city you are browsing from

- This data is collected for monitoring and understanding the effectiveness of our websites. We also collect data relating to the demographics and interests of our users via Google Analytics and cookies set by Google advertising networks. This data is used in aggregated form to help improve the site and GBS marketing efforts. For further information on Google safeguards for personal data see: <https://policies.google.com/privacy>.

12. Cookies

- 12.1. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. For more information about how to reject cookies using your internet browser settings, please consult the “Help” section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). 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 the [Cookie Policy](#).

13. Third-party Links

- 13.1. Our websites 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 statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

14. Consent

- 14.1. By using our site, you consent to GBS website privacy policy.

15. Data Protection and Confidentiality

- 15.1. GBS is registered with the Information Commissioner’s Office as a Data Controller. Details of the School’s registration are published on the Information Commissioners website. GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA), as amended.

16. How to Complain

- 16.1. GBS only processes your personal information in compliance with this privacy policy and in accordance with the relevant data protection laws. If you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the ICO. In the first instance, complaints should be directed to GBS Data Protection Officer at dpa@globalbanking.ac.uk.
- 16.2. If you remain concerned that your information has not been handled as described, you may raise your complaint with the ICO.
- 16.3. By submitting a complaint, you are agreeing that GBS can process, use, and share information it contains to enable the complaint to be considered. Information may be disclosed to any person who has a need to see it for the complaint to be fully investigated. Information may also be shared with relevant people after a complaint to facilitate actions and recommendations after investigation.
- 16.4. All documentation relating to complaints will be kept confidential and shall be disclosed only to those persons who have a right to the information by virtue of their role in the complaints process, or as required by law.

17. Monitoring and Review

- 17.1. This policy may be amended by GBS at any time. GBS will regularly test our systems and processes to monitor compliance. Any issues related to the monitoring and review of this policy, please contact asqo@globalbanking.ac.uk.

18. Alternative Format

- 18.1. This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact the Academic Standards and Quality Office at asqo@globalbanking.ac.uk.

19. Glossary

LAWFUL BASIS

- 19.1.1. **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service 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.

19.1.2. **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.

19.1.3. **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.

YOUR LEGAL RIGHTS

You have the right to:

19.1.4. **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.

19.1.5. **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.

19.1.6. **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 to continue 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. The further retention of the personal data should be lawful where it is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for the performance of a task carried out in the public interest or in the exercise of official

authority vested in the controller, on the grounds of public interest in the area of public health, for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, or for establishment, exercise or defence of legal right.

19.1.7. **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.

19.1.8. **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.

19.1.9. **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.

19.1.10. **Right to Data Portability.** The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.

19.1.11. **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.