INTRODUCTION

Welcome to the EducateU Ltd privacy notice.

EducateU Ltd respects your privacy and is committed to protecting your personal data.

This privacy notice is provided in a layered format so you can click through to a specific privacy policy.

This website is not intended for children and we do not knowingly collect data relating to children on this website. However, where EducateU processes personal data of children in its business operations, we ensure that appropriate safeguards and consents are obtained from parents or caregivers as applicable and that we follow relevant guidance from the Information Commissioner's Office in relation to the processing of children's data.

It is important that you read the privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

IMPORTANT INFORMATION AND WHO WE ARE

DATA CONTROLLER

EducateU Ltd is a company registered in the United Kingdom under company number 14282467 and we have our registered office and our main trading address at 116-120 Meridian Place, Canary Wharf, London, E14 9FE

Notification details can be accessed by searching the Data Protection Public Register. F

EducateU Ltd. Group of companies is made up of different legal entities, details of which can be found here https://educateu.com/about

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated: April 2025.

We may from time to time change the detail in this notice. Any changes we may make in the future will be posted on this page. Please check back frequently to see any such updates or changes.

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.

THIRD-PARTY LINKS

This website 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 notice of every website you visit.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. 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 here. (https://support.google.com/accounts/answer/61416?hl=en&co=GENIE.Platform%3DDesktop)

GLOSSARY of TERMS

LAWFUL BASIS

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

Contractual necessity means processing your data where it is necessary for the performance of a contract to which you are a party or to take preliminary pre-contractual steps at your request before entering into such a contract.

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.

To view relevant privacy policy, click to expand below:

EDUCATEU WEBSITE VISITOR

IF YOU ARE A VISITOR TO OUR WEBSITE

Types of personal information we collect

We collect, use and store different types of personal information about you, which we have grouped together as follows:

Types of personal information	Description
Publicly Available Data	Details about you that are publicly available, such as on Companies House websites or elsewhere on the internet
Marketing Data	Details about your preferences in receiving marketing communications from us
Consents Data	Any permissions, consents or preferences that you give us
Usage Data	Information about how you use our website, products and services

How we use your information

Cookies

Our website https://educateu.com/ uses cookies. For more information on our cookies use, please read our cookies statement on our website.

Generally

The table below outlines how we use your personal information and our reasons for such usage. Where these reasons include legitimate interests, we explain what these legitimate interests are.

What we use your information for	Our reasons	Our legitimate interests
To provide you with information you may ask for	Consent Legitimate interests	To fulfil enquires you might make of us
To allow you to register for updates or for notifications of blog posts on our website	Consent Legitimate interests	To provide you with information that you may request from us
To allow you to register for events that we may be hosting	Consent Legitimate interests	To hold events, such as seminars, webinars, open days or corporate hospitality to promote our business and its services
To allow you to register as a member of our alumni network	Consent Legitimate interests	• To operate and develop our alumni network and the • activities of our alumni programme
To administer and protect our business and this website (including	Legitimate interests	• To provide efficient client care and services

troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)		• To ensure that our technology operates efficiently and without error • To assess which of our services may be of interest to you and to tell you about them • To develop new products and services and improve existing • ones
To manage our relationship with you which will include notifying you about changes to our privacy notice and our website terms and conditions	Legitimate interests Contract performance	• To provide efficient client care and services • To keep you updated about changes in the legal terms that apply to the use of our website. For record keeping and firm • management
To manage the systems that contain our marketing database To manage marketing preferences and keep our records up to date	Legitimate interests	• For data management for marketing and business development purposes • To improve our systems and services • To seek feedback • To seek your consent when we need it to contact you
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Legitimate interests Consent	To improve our marketing strategy and the services that we provide
Sharing information with third parties-to facilitate data gathering to improve our educational services, our website, and our marketing efforts.	Legitimate interests	For the purposes of PEN's legitimate business interests such as managing and developing its business

Where we collect your personal information from

We may collect personal information about you from the following sources:

- Directly from you
- Cookies – see our cookie statement which can be accessed from our website
- Analytics providers, such as Google Analytics

Who we share your information with

We may share your personal information with the following third parties:

- Our agents and service providers who we use to help us with marketing.
- Event organisers (if we are organising an external event which you are attending)
- The police and other law enforcement agencies
- Relevant regulators, including the Information Commissioner's Office in the event of a personal data breach
- Other companies owned or jointly owned by Planet Education Networks (PEN).
- Potential or actual purchasers of any part of our business or assets, or other third parties in the context of a possible transfer or restructuring of our business.
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How long we keep your personal information

Where we use your personal information for marketing purposes, we will retain your personal information for so long as we have your consent to do so (where we use your personal information with your consent in order to send you marketing messages) or, in other cases, for so long as we have a legitimate business or commercial reason to do so (unless you ask us to stop).

Where you withdraw your consent to receiving marketing materials or otherwise ask us to stop marketing, we will add your details to a suppression list which ensures that we remember not to contact you again.

For further information as to how to withdraw your consent or to ask us to stop other marketing activities see **Withdrawing consent using your information** and **Objecting to how we may use your information**.

If you withdraw your consent to receiving marketing materials or ask us to stop our marketing activities, we will still communicate with you for other purposes in the normal course of any other relationship we may have with you.

International transfers

As a global company, we hold some personal information concerning our suppliers and their affairs within the United Kingdom. We do work with agents and service providers who may process your personal information on our behalf outside the UK. If your information is processed outside the UK, we will ensure that it is protected to the same standards as if it were being processed within the UK by putting in place a contract with our agents and service providers that provides adequate safeguards, such as Standard Contractual Clauses or equivalent measures.

STUDENTS OR PROSPECTIVE STUDENTS

Applicants and Students Privacy Notice

Purpose of this Notice

EducateU ("we", "our", "us") is committed to protecting and respecting your privacy.

This privacy policy sets out the basis on which any personal data we collect from you or that you or any third parties provide, will be processed by us. We may withdraw or modify this notice at any time, and we may supplement or amend this notice by additional policies and guidelines from time to time. We will notify you if this notice is amended.

We are a data 'controller', which means we are responsible for deciding how we hold and use your personal information.

"Personal data" refers to information relating to a living, identifiable individual. It can also include **"special categories of data"**, which is information about your racial or ethnic origin, religious or other beliefs, and physical or mental health, the processing of which is subject to strict requirements. Similarly, information about criminal convictions and offences is also subject to strict requirements.

"Processing" means any operation which we carry out on your personal data e.g., obtaining, storing, transferring and deleting.

2. Your personal information

We hold a range of personal data about you, some of which you provide to us directly. Examples of categories of personal data which we hold are your contact details, prior educational experience/attainment, immigration information (e.g., passport details, language proficiency), where relevant, health information (including any disabilities) and other equalitymonitoring data you provide to us. In addition, if you come to study with us, we process data about your academic performance, attendance and progression, and where relevant, breaches of our policies (e.g., academic or other misconduct concerning EducateU-related activities). We also process contact and educational details after you have completed your programme or your activities with us are otherwise terminated.

The purposes for which we process your personal data and the legal basis

When you are an applicant, we process your personal data for the purposes of assessing your eligibility to be offered a place on one of our academic or professional programmes.

If you take up a place at EducateU, we process your personal data for the purposes of providing our academic or professional programmes and related services.

If you are unsuccessful or do not take up a place at EducateU, we will retain your personal data in line with our retention schedules for statistical and audit purposes or in the event of a complaint or an appeal.

We only process data for specified purposes and if it is justified in accordance with data protection law. The table below lists the various purposes for which we process personal data and the corresponding justification for it. Some processing of your personal data is justified on the basis of contractual necessity. In general, this applies to personal data you provide to us to process your application and if enrolled, to monitor academic performance. Without that information, we would be unable to provide you with your chosen academic programme and related support services. Some personal data is also required to fulfil our legal obligations regarding immigration. A failure to provide that information would prejudice your application.

No	Purpose	Legal Basis/Justification
1	Assessing eligibility to undertake our academic or professional programmes.	Processing is necessary for the purposes of taking steps prior to entering a contract with us
2	Supporting applicants through the application process and providing further information on the services we can offer	Necessary for negotiating to enter a contract and legitimate interests in providing support to applicants
3	Provision of academic programmes and related services (including IT and library services).	Necessary for performing a contract, i.e., to provide your chosen academic programme. This can be a contract with us or a contract between you and your home institution ("contractual necessity")
4	Identifying students and assisting them in trying to succeed in their learning via the dashboard system.	Contractual necessity and legitimate interest in assisting our students to succeed in their studies
5	Assessment of academic progress and performance (including attendance), and where necessary providing support	Contractual necessity
6	Financial Administration (including provision of loans/ bursaries)	Contractual necessity
7	Administration of extenuating circumstances procedures.	Contractual necessity
8	Administration of complaints, academic appeals, interruption and withdrawal, fitness to study.	Contractual necessity

9	Making reasonable adjustments for disabilities and providing relevant support to students with ill health and providing wellbeing support. This includes processing special category information.	Explicit consent.
10	Employability Support	Contractual necessity and our legitimate interest in assisting our students and alumni to progress in their careers.
11	Regulating PEN's community (including dealing with misconduct under our procedures for academic and other misconduct including disciplinary procedures)	Contractual necessity and our legitimate interest in maintaining academic standards and the good order of the PEN community.
12	Obtaining payment of fees.	Contractual necessity and our legitimate interest in obtaining prompt payment for the services we provide.
13	Protecting our property and assets (e.g. by dealing with misconduct)	Necessary for our legitimate interest in safeguarding our property and assets.
14	Providing appropriate I.T. and other infrastructure facilities e.g. a virtual learning environment	Contractual necessity: legitimate interest in providing a proper infrastructure to support the provision of academic or professional programmes and related student services.
15	Communicating with students	Contractual necessity and our legitimate interest in marketing PEN and promoting student welfare
16	Registering alumni to maintain an alumni network	Necessary for our legitimate interests in maintaining an alumni network, and marketing.
17	To facilitate data-gathering to improve our educational services, our website, and our marketing efforts	PEN's legitimate business interests such as managing and developing its business

There may be other processing in addition to the above for example, when you access our website which uses cookies or when we take photos of our events and publish them. This is done on the basis of our policies, and we will inform you about such processing at the time when the data is obtained or as soon as reasonably possible thereafter.

Where the basis of processing your personal data is a contractual necessity and you fail to provide the personal data in question, EducateU may not be able to process your application or provide you with the programme for which you have applied.

Personal data received from third parties

No	Data	Source
1	Contact details and attainment.	Accredited PEN agents & representatives
2	Your immigration status.	Home Office (UKVI)
3	Transcripts - details of programmes undertaken or being undertaken at another institution; attainment.	Another institution and/or secondary/high schools.
4	Medical, mental health, accessibility-related and similar information. **This is special category personal data**. We only obtain this information from third parties if you give us consent to do so or if it's a matter of life and death.	Another institution, medical practitioners and/or family members
5	Your financial status.	Student Loans Company.
6	Details of any PEN-associated complaint	Office of the Independent Adjudicator, and/or Competition and Markets Authority
7	Information required to assess eligibility for courses i.e. from employers or sponsors.	Employers or sponsors.
8	Details of performance at a partner institution including attendance and disciplinary issues.	Our collaboration partners.

EDUCATEU JOB APPLICANT

Privacy Notice If you are a Job Applicant

1. What is this notice?

This is the 'Recruitment Privacy Notice' of EducateU Ltd. This notice applies to individuals applying to work with us, including prospective directors, employees, workers, consultants and contractors. It applies whether the work applied for is part time or full time; or permanent, temporary or for a fixed term.

We are a data 'controller', which means we are responsible for deciding how we hold and use your personal information.

This notice explains how and why we will collect and use your personal information in the context of the recruitment process and your rights in relation to your personal information. We may amend this notice at any time.

2. Your personal information

In this privacy notice, 'your personal information' means your personal data i.e. information about you from which you can be identified. Sections 5 and 6 below set out your personal information that we may process.

Your 'personal information' does not include data where the identity has been removed (anonymous data).

It is important that your personal information is accurate and up to date. Please inform us if your personal information changes during the recruitment process.

3. Special categories of personal information

'Special categories of personal information' means information about your racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; health; sex life or sexual orientation; criminal convictions, offences or alleged offences; genetic data; or biometric data for the purpose of uniquely identifying you.

Data marked * in the table at section 5 below, and data described at section 6, falls within these 'special categories' or might disclose special categories of personal information. We must have additional legal grounds for processing special categories of personal information, and these grounds are set out at sections 5 and 6 below.

4. Where does your personal information come from?

Your personal information will come from you or us, and may also come from the following sources:

- Recruitment agencies may provide us with the following personal information: personal contact details, qualifications, schools attended, details of previous employment(s), skills and experience, hobbies and interests, and interview notes.

- Credit reference agencies may provide us with the following personal information: personal contact details, date of birth, details of credit accounts and usage and an overall credit score.

- Former employers or other referees, whom you have given us permission to contact, may provide us with the following personal information: role(s) held, dates of employment, details of skills and capabilities and any other information that helps to assess your suitability for the position applied for.

- EducateU staff may provide us with personal information about you if they are referring you for recruitment.

- Medical professionals may provide us with the following personal information: information relating to any disability that you may have, the effects of that disability, and adjustments that may need to be made to the recruitment process as a result of that disability

- Google and social networking accounts (such as LinkedIn): as part of the recruitment process, we may source personal information relating to roles you have held, details of skills and capabilities and any other information that helps us to assess your suitability for the position applied for.

Disclosure and Barring Service: as described at Section 6 below.

Some of the sources above will only be relevant in certain circumstances, or if you have applied for a particular role. If you would like more information on the source of your personal information, please contact EducateU and request for the HR department.

5. Processing your personal information

We may process your personal information during and after the recruitment process. This may include collecting your personal information, recording it, storing it, using it, amending it, destroying it and, in some circumstances, disclosing it.

In general, we process your personal information for the reasons, and on the legal grounds set out in the following table, and to:

- Retain records relating to the recruitment process.
- Establish, exercise or defend legal claims.
- Comply with the law or requirements of any regulator; and
- Protect your vital interests or those of another person (in exceptional circumstances, such as a medical emergency).

Reasons for processing your personal information	Legal ground(s) for processing, and legitimate interest (where applicable)	Your personal information
Contact you regarding the recruitment process and any offer of work	To enter a contract	Personal contact details (including name, address, email, telephone number (landline and /or mobile number)
Make a decision about your recruitment or appointment, including assessing your skills, qualifications and suitability for the work	To enter a contract for our legitimate interests: • to select suitable employees, workers and contractors	• Information provided in your application form, CV, any covering letter or email, and interview notes • Information sourced from google and social networking accounts (such as LinkedIn) relating to roles you have held, details of skills and capabilities and other information that helps us to assess your suitability for the work in question.
If you have accepted an offer of work from us that is subject to such checks: • Take up references (from referees whom you have given us permission to contact) • Carry out credit checks; and / or • Confirm your professional memberships, registrations and / or qualifications.	To enter a contract for our legitimate interests: • to select suitable employees, workers and contractors	• References and details of previous employers (including role(s) held, dates of previous employment, details of skills and capabilities and other information that helps to assess your suitability for the position applied for) • Results of credit check: personal contact details, date of birth, details of credit accounts and usage and credit score • Professional qualifications, registrations, practising certificates, accreditation details, and membership details

Reasons for processing your personal information	Legal ground(s) for processing, and legitimate interest (where applicable)	Your personal information
Determine the terms of any potential contract between you and us	To enter a contract to comply with a legal obligation	Offer letter, and proposed contract between you and us
If you have accepted an offer of work, check you are legally entitled to work in the UK	To enter a contract to comply with a legal obligation	Documentation confirming your right to work in the UK
Consider reasonable adjustments to the recruitment process for disabled applicants	To enter a contract to comply with a legal obligation For our legitimate interests: • To select suitable employees, workers and contractors For special categories of information: • To exercise or perform employment law rights or obligations	Information about a disability, the effects of that disability, and adjustments that may need to be made to the recruitment process as a result of that disability*
Carry out equal opportunities monitoring.	For our legitimate interests: • to review equality of opportunity or treatment *For special categories of information: • To review equality of opportunity or treatment To exercise or perform employment law rights or obligations	The following information you have provided via our equal opportunities monitoring form: • Health data, including disability information* • Information regarding pregnancy and maternity* Age and date of birth • Marriage or civil partnership status* • Gender • Information on gender reassignment* • Data revealing race, religious beliefs or sexual orientation

Information about criminal convictions

To enable us to make recruitment decisions and assess suitability for work, we will process information about criminal convictions and offences (including alleged offences) as described in this section 6.

We will process this information to enter a contract with you, to comply with a legal obligation, for our legitimate interests (in selecting suitable employees, workers and contractors), and to exercise or perform employment law rights or obligations.

If you have accepted an offer of work from us that is subject to a criminal record check, we will ask you to obtain a disclosure check (at the appropriate level) from Disclosure and Barring Service and provide us with a copy of this within a reasonable period of time.

6. Data necessary for the contract

Sections 5 and 6 above identify personal information that we may need to enter a contract with you. You are not obliged to provide this information, but if you don't provide it, we may not be able to proceed with the recruitment process or enter into the contract.

7. Statutory requirement to provide your personal information

In some circumstances, the provision of your personal information relates to a statutory requirement. This includes:

- Documentation confirming your right to work in the UK – you are not obliged to provide this information, but if you don't provide it, we will not be able to enter into a contract with you.

8. Sharing your personal information with third parties

We may share your personal information with the following third parties if this is required by law; necessary to enter a contract with you; where there is another legitimate interest in doing so; or where it is necessary to protect your vital interests or those of another person:

- Health professionals and occupational health providers involved in your care, in order to consider reasonable adjustments to the recruitment process for disabled applicants.

- Relevant regulators such as The Association of Chartered Certified Accountants, the Law Society of England and Wales and the Solicitors Regulation Authority

- Our professional advisors.

- Other third parties as necessary to comply with the law.

9. Automated decision-making

We do not envisage taking any decisions about you based solely on automated processing (i.e.

without human involvement), which have a legal or similarly significant effect on you.

10. Transferring your personal information outside the UK

We share your personal data within the Planet Education Networks (PEN) Group. This will involve transferring your data outside the UK.

Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

11. Data retention

If you don't start work with us following the recruitment process, we will retain your personal information for six months thereafter:

- to allow us to establish, exercise or defend legal claims; and

- for our legitimate interests – to enable us to reconsider your application and (if appropriate) contact you, if the position you applied for becomes available again.

If you ask us to retain your personal information so that we can contact you to discuss future work opportunities, we will write to you separately, to obtain your explicit consent to retain your personal information for a fixed period of two years on that basis.

If you start work with us following the recruitment process, we will give you a copy of our Staff Privacy Notice and will retain your personal information as detailed in the Staff Privacy Notice.

Your rights as a data subject

As a data subject, you have the following rights in relation to your personal data processed by us:

- To gain access to your personal data.

- To rectify inaccuracies or where appropriate, given the purposes for which your data is processed, the right to have incomplete data completed.

- To have your personal data erased. This is a limited right which applies, among other circumstances, when the data is no longer required, consent has been withdrawn and/or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest.
- To object to the processing of your personal data for marketing purposes. You may also object when the processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing.

- To restrict the processing of your personal data. This is a limited right which will apply in specific circumstances and for a limited period.

- To obtain a copy of your data in a commonly used electronic form if the data is processed by automated means and the processing is based on your consent or contractual necessity.

- To not have decisions with legal or similar effects made solely using automated processing, unless certain exceptions apply.

Where we are relying on your consent to process your data, you may withdraw your consent at any time. Your requests will be usually be considered at the latest within one month of receipt of the request.

If we are unable to adequately address any concerns you may have about the way in which we use your data, you have the right to lodge a formal complaint with the UK Information Commissioner's Office. Full details may be accessed on the complaints section of the ICO's website

EDUCATEU STAFF

EducateU Ltd ("we", "our", "us") is committed to protecting and respecting your privacy.

This privacy policy sets out the basis on which any personal data we collect from you, or that you or any third parties provide, will be processed by us. We may withdraw or modify this notice at any time, and we may supplement or amend this notice by additional policies and guidelines from time to time. We will notify you if this notice is amended.

What is Personal Data?

'Personal data' means any information which identifies you as an individual. It may include your name, but it may also be other information such as your date of birth, nationality and gender which when combined identify you.

This Statement and EducateU data protection obligations

In accordance with the UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018 (the "DPA"), together, the "Data Protection Laws", we are a Data Controller as we determine the purposes for which, and the manner in which, any personal data is, or is likely to be, processed. This means that we are legally responsible for the personal data we collect and hold about you. It also means that we must comply with the data protection principles (see below). One of our responsibilities is to tell you about the different ways in which we use your personal data – what information we collect (and 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 the information. This notice provides further details about all of these issues.

In order to comply with our contractual, statutory, and management obligations and responsibilities, we need to process personal data relating to our employees, including

‘sensitive’ or special categories of personal data, as defined in the Data Protection Laws which includes information relating to health, racial or ethnic origin, and criminal convictions.

All personal data will be processed in accordance with the Data Protection Laws and EducateU Data
Protection Policy: https://educateu.com/privacyPolicy

Using your information in accordance with Data Protection Laws

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.

The legal bases on which your personal data are collected, the types of personal data, and the purposes for which they are processed is given below.

Application for employment (Subsection)

We need to process your personal data that you supplied to EducateU as part of your application for a position at EducateU. This is to ensure that your application can be considered by the relevant department. In your application we will collect the following information:

Personal data gathered

In your application we will collect the following information

First Name(s)
Last Name
Title
Other Name(s)
Preferred Forename
Your Address
Postcode
Telephone (Home)
Telephone (Work)
Telephone (Mobile)
Your personal Email
Details of your Secondary and/or Tertiary education
Professional qualifications
Statement in support of your application
Details within your submitted Curriculum Vitae (CV)
Details of your right to work in the UK

Information about your present and employment history for the previous five years including:

Name of Employer(s)
Address Line 1
Address Line 2
Town
County
Postcode
Job Title
Date From
Date To
Salary
Notice Required

In addition, we may contact your referees as provided in your application to confirm the employment information that you provided.

Special categories personal data

As part of the application, you will be asked to provide equality and diversity information, this may include data concerning:

Any disability
Your ethnicity
Your sexual orientation Your
religious beliefs
You have the right to not provide this information, in which case EducateU will note to statutory bodies that you elected not to provide this information

Criminal records information

In some circumstances we may process your information to undertake a Disclosure and Barring Service (DBS) check, as required by law.

During your employment

The Data Protection Laws define ‘sensitive personal data’ or 'special categories of personal data' as information that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, genetic data, biometric data, data concerning sex life or sexual orientation. We will process this data, as well as the data provided in your application in order to perform our obligations arising from your contract of employment with us. The additional personal data we process to meet these responsibilities includes:

Additional data-personal information

The additional personal data (including some special category personal data) we process to meet our responsibilities as an employer includes the following:

Previous sickness information including the reasons for the absence
Bank account details
Passport details
Visa details
Sick pay
Leave entitlement
Parental pay
Pensions data
Remuneration and benefits
Emergency contacts

Statutory responsibilities

We may process your personal data in order to meet responsibilities imposed on us by legislation. The personal data processed to meet statutory responsibilities includes, but is not limited to, data relating to:

Tax; National Insurance; Statutory Sick Pay; Statutory Maternity Pay; family leave; work permits, and equal opportunities monitoring.

Our lawful basis for processing

The lawful bases for processing personal data will be:

UK GDPR Article 6(1) (b) Contract
UK GDPR Article 6(1) (c) Legal obligation
UK GDPR Article 6(1) (f) Legitimate Interests

Purpose of processing

We will use your personal data in connection with your employment relationship with us, including for the following purposes:

- To facilitate staff training, such as e-learning.
- Managing our accounts and records and providing commercial activities to our clients. For the use of CCTV systems to monitor and collect visual images for the purposes of security and the prevention and detection of crime.
- To provide you access to relevant systems to undertake your role.
- To fulfil our obligations for the contract of employment.
- Processing recruitment applications.
- Talent, performance and succession planning.
- Paying and reviewing salary and other remuneration and benefits.
- Providing and administering benefits (including pension, voluntary healthcare schemes, salary sacrifice schemes and others).
- Undertaking performance appraisals and reviews.
- Policy and Legal Governance requirements and compliance.
- Internal audit and data collection.

- Legal compliance, requirements and obligations.
- Maintaining sickness and other absence records.
- Providing references and information to future employers and, if necessary, governmental bodies.
- Processing information regarding equality of opportunity and treatment of data subjects in line with the monitoring of equal opportunities and access.
- The information we process may be held on EducateU systems some of which may be owned and operated by third parties.

Where we engage with such third parties, we insist upon strict contractual requirements to be adhered to by, them to protect the personal data.

Special categories personal data

The Data Protection Laws define 'sensitive personal data' or 'special categories of personal data' as information about racial or ethnic origin; political opinions; religious beliefs or other similar beliefs; trade union membership; physical or mental health; sexual life. In certain limited circumstances, the Data Protection Laws permit us to process such data without requiring the explicit consent of the employee.

(a) We will process sensitive personal data about an employee's health where it is necessary, for example, to record absence from work due to sickness, to pay statutory sick pay, to make appropriate referrals to the Occupational Health Service, and to make any necessary arrangements or adjustments to the workplace in the case of disability. This processing will not normally happen without the employee's knowledge and consent.

(b) Other than in exceptional circumstances, EducateU will process sensitive personal data about an employee's racial and ethnic origin, their sexual orientation or their religious beliefs only where they have volunteered such data and only for the purpose of monitoring and upholding EducateU's equal opportunities policies and related provisions.

(c) Information about an employee's criminal convictions will be held as necessary and only in accordance with Data Protection Legislation.

The lawful basis for processing this special category personal data will be:

UK GDPR Article 9(2)(b) 'processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by UK law providing for appropriate safeguards for the fundamental rights and the Interests of the data subject.

Sharing personal data

We sometimes need to share the personal information we process with you and with other organisations. Where this is necessary, we are required to comply with all aspects of the Data Protection Laws.

We may use third party providers to deliver our services, such as externally hosted software or cloud providers, and those providers may involve transfers of personal data outside of the UK. Whenever we do this, to ensure that your personal data is treated by those third parties securely and in a way that is consistent with UK data protection law, we require such third parties to agree to put in place safeguards, such as Standard Contractual Clauses or equivalent measures.

Where necessary or required we will share your information with:

- Family associates and representatives of the person whose personal data we are processing;
- current, past or prospective employers;
- healthcare, social and welfare organisations;
- suppliers and service providers;
- financial organisations;
- auditors;
- police forces, security organisations;
- prison and probation services;
- legal representatives;
- local and central government;
- consultants and professional advisers;
- trade union and staff associations; • survey and research organisations, and
- press and the media.

Furthermore, in order to fulfil its statutory responsibilities, EducateU is required to provide some of an employee's personal data to government departments or agencies e.g., provision of salary and tax data to HM Revenue & Customs.

Automated processing

EducateU does not use automated processing and decision making without manual intervention. We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Principles

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

Principle	**Personal Data shall be:**
Lawfulness, fairness and transparency	be processed lawfully, fairly and in a transparent manner in relation to the data subject.
Purpose limitation	collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
Data minimisation	adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
Accuracy	accurate and, where necessary, kept up to date.
Storage limitation	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.
Integrity and confidentiality	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
Accountability	be able to demonstrate compliance with the above principles

Keeping personal data up-to date

The Data Protection Laws require us to take reasonable steps to ensure that any personal data we process is accurate and up-to-date. Employees are responsible for informing us of any changes to the personal data that they have supplied during the course of their employment. You can contact us to update your personal data.

Retention of your data

EducateU retains personal information it collects from you where there is an ongoing business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When there is no ongoing business need to process your personal information, EducateU will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then EducateU will securely store your personal information and isolate it from any further processing until deletion is possible.

Personnel files are retained for a period of at least six years from the date of termination of employment.

How does EducateU protect data?

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

Your rights

Under certain circumstances, you may have the following rights in relation to your personal data:

Right 1: A right to access personal data held by us about you.

Right 2: A right to require us to rectify any inaccurate personal data held by us about you.

Right 3: A right to require us to erase personal data held by us about you. This right will only apply where, for example, we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).

Right 4: A right to restrict our processing of personal data held by us about you. This right will only apply where, for example, you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose, we collected it for, but we require the data for the purposes of dealing with legal claims.

Right 5: A right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this personal data to another organisation.

Right 6: A right to object to our processing of personal data held by us about you.

Right 7: A right to withdraw your consent, where we are relying on it to use your personal data.

Right 8: A right to ask us not to use information about you in a way that allows computers to make decisions about you and ask us to stop.

Changes to our privacy Policy

Any changes we make to this privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail.

Who regulates the use of my personal information?

EducateU maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with the Data Protection Legislation.

The data controller for the purposes of the General Data Protection Regulation is EducateU Ltd.

If we are unable to adequately address any concerns you may have about the way in which we use your data, you have the right to lodge a formal complaint with the UK Information Commissioner's Office. Full details may be accessed on the complaints section of the ICO's website.

EDUCATEU FORMER EMPLOYEE

Former employees

EducateU Ltd ("we", "our", "us") is committed to protecting and respecting your privacy.

This privacy notice applies to former employees of EducateU.

It is important that you read this privacy notice together with our privacy notice at: https://educateu.com/privacyPolicy or any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you. This is so that you are fully aware of how and why we are using your data.

Information we collect

EducateU does not collect personal data from former employees after they have left our employment, but it may hold the information that was collected before and during the employment relationship, including:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth
- Gender
- Marital status and dependants
- Next of kin and emergency contact information
- National insurance number
- Copy of identification (Passport/driving licence)
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start date
- Location of employment or workplace

- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process)
- Employment records (including job titles, work history, working hours, training records and professional memberships)
- Compensation history
- Performance information
- Disciplinary and grievance information
- CCTV footage and other information obtained through electronic means
- Information about your use of our information and communications systems
- Photographs

Our lawful basis for processing

The lawful bases for processing personal data will be:

UK GDPR Article 6(1) (b) Contract
UK GDPR Article 6(1) (c) Legal obligation
UK GDPR Article 6(1) (f) Legitimate Interests

How we process your information

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the obligations in a contract, we have entered into with you, such as the employment contract, or a settlement agreement. Some of the contractual obligations in these contracts continue after your employment has terminated, such as the duty to observe confidentiality.

2. Where we need to comply with a legal obligation, we may also use your personal information in the following situations, which are likely to be rare:

   (a) Where we need to protect your vital Interests (or someone else's vital Interests). UK GDPR Article 6(d).

   (b) Where it is needed in the public interests. UK GDPR Article 6(1) (e).

   (c) We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We may process your data for the following purposes:

- Paying you and deducting tax and National Insurance contributions and other lawful deductions.
- Providing you with any employee related benefits to which you are entitled after the termination of your employment.
- To reimburse you for expenses incurred in the course of your employment.
- Liaising with your pension provider and the trustees/administrators of pension schemes.
- Administering any contract, we have entered into with you.
- Business management and planning, including accounting and auditing.
- Gathering evidence for possible grievance or disciplinary hearings.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
  To prevent and detect fraud.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies (such as the staff survey) to review and better understand employee retention and attrition rates.
- Equality and diversity monitoring
- Publicising our activities (e.g., group photos of events, site visits, etc.).

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

How we process "special categories" of more sensitive personal information

We may also store and use the following "special categories" of more sensitive personal information that we have collected from you:

- Information about your race or ethnicity
- Information about your health, including any medical condition, health and sickness records.
- Biometric data.
- Information about criminal convictions and offences.

These "special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for storing and using this type of personal information. Our data protection policy contains details of the safeguards which we are required by law to maintain when processing such data.

We may process special categories of personal information in the following circumstances:

1. Where we need to carry out our legal obligations or exercise rights in connection with employment.

2. Where it is needed in the public interest: for example, we will use information about your race or national or ethnic origin to ensure meaningful equality and diversity monitoring and reporting. Where possible, we would seek to anonymise this data.

3. In limited circumstances, with your explicit written consent. However, we do not need your consent to use special categories of your personal information to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Who is the information shared with

We may share your data with third parties, including third-party service providers, Government departments and agencies.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK. If we do, you can expect a similar degree of protection in respect of your personal information.

EducateU shares your data with:

- Occupational Pension Scheme Trustees and Administrators.
- Occupational Health providers screening

Retention

EducateU will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected.

EducateU has a records retention schedule that outlines how long we will retain information.

To determine the appropriate retention period for personal data collected as part of your employment, 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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee we will retain and securely destroy your personal information after the following periods

- 12 months from date of leaving for employees; except

    Payroll, tax and NIC records which must be retained for six years. This is a legal requirement.

However, these periods only apply to your employment records and not for example to images and materials created and use for marketing and communication purposes (e.g. group photographs taken etc.)

Your rights

Under certain circumstances, you may have the following rights in relation to your personal data:

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Right 2: A right to require us to rectify any inaccurate personal data held by us about you.

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Right 5: A right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this personal data to another organisation.

Right 6: A right to object to our processing of personal data held by us about you.

Right 7: A right to withdraw your consent, where we are relying on it to use your personal data.

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Who regulates the use of my personal information?

EducateU maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with the Data Protection Legislation.

Who do I contact with questions?

The data controller for the purposes of the UK General Data Protection Regulation is EducateU Ltd. If you have any questions or concerns about how your personal data is used, please consult https://educateu.com/privacyPolicy,

If we are unable to adequately address any concerns you may have about the way in which we use your data, you have the right to lodge a formal complaint with the UK Information Commissioner's Office. Full details may be accessed on the complaints section of the ICO's website

CLIENTS OF EDUCATEU (INCLUDING EMPLOYER CLIENTS)

Types of personal information we collect:

We collect, use and store different types of personal information about you, which we have grouped together as follows:

Types of personal information	**Description**
Identity Data	ID information including your name, marital status, title, date of birth and gender
Contact Data	Where you live and how to contact with you
Financial Data	Your financial position, status and history, including bank details and credit rating
Transactional Data	Details about payments to and from you and other details about services you purchase from us, and we purchase from you
Communications Data	What we learn about you from letters, emails and conversations between us
Publicly Available Data	Details about you that are publicly available, such as on Companies House websites or elsewhere on the internet
Consents Data	Any permissions, consents or preferences that you give us
Usage data	Information about how you use our website, products and services.
Special category Data	Some types of personal information are defined as special. We will only collect and use these types of information where we need to and if the law allows us to: • Racial or ethnic origin • Political opinions, religious or philosophical beliefs • Trade union membership • Genetic or biometric data used for ID purposes • Health data • Sex life and sexual orientation • Criminal convictions data

How we use your information The table below outlines how we use your personal information and our reasons. Where these reasons include legitimate interests, we explain what these legitimate interests are.

What we use your information for	Our reasons	Our legitimate interests
• To receive the products or services you provide to us • To provide you with services and fulfil our contractual obligations • To provide you with other products or services that you may acquire from • To provide advice or guidance about our products or services	• Contractual performance • Legal obligation • Legitimate interests	• To exercise our rights under contract and provide you with services agreed • To exercise our rights under contract and provide you with our products and services • To keep our records up to date, including your client file
• To run our business in an efficient and proper way. This includes managing financial administration, business capability, planning, communications, corporate governance and audit • To improve our products and services and develop new ones	• Contractual performance • Legitimate interests • Consent • Legal obligation	• To manage credit control and debt recovery • To bill for the services we provide and deal with funds transfers • For financial reporting • To manage complaints and claims • To be efficient about how we manage our relationship with you and fulfil our responsibilities generally • To improve our efficiency and provide clients with new or improved products and service
• For procurement purposes, including supplier due diligence, background checks and the assessing of tenders • To carry out credit checks	• Legitimate interests	• To carry out supplier due diligence • To ensure our contracts provide us with best value • To assess the financial worthiness and reliability of those with whom we deal
• For marketing and business development activities, including Seeking new business, promoting our business and events management.	• Consent • Legitimate interests	• To develop our relationship with you and others • To attract new business • To promote our business • To hold events, such as seminars or corporate hospitality to promote our business and its services • To seek your consent if we need it to contact you
• For the prevention of crime and better ensuring public safety, including through the use of CCTV	• Legal obligation • Legitimate interests	• To manage the risk of crime and safety for us, our employees and our clients • To develop and improve how we deal with crime • To report criminality or the suspicion of criminality for the wider benefit of society • To be efficient about how we fulfil our responsibilities generally

Where we collect your personal information from

We may collect personal information about you from the following sources:

- Directly from you or the organisation for whom you work
- Companies or individual that tell you about us
- Publicly available resources, such as Companies House
- The internet and social networking sites such as LinkedIn
- Third parties with whom we deal with during the course of carrying on our business
- Market researchers
- Intermediaries with whom you are also a client
- Credit reference agencies and fraud prevention agencies

Who we share your information with

We may share your personal information with the following third parties:

- Agents and service providers that we use during the course of providing services,
- Our professional advisors
- Other suppliers to the Planet Education Networks (PEN) Group
- The police and other law enforcement agencies where it is necessary to do so for the purpose of providing you with our services, or where we have a legal or regulatory obligation to do so
- Relevant regulators, including the Information Commissioner's Office in the event of a personal data breach
- Other companies owned or jointly owned by Planet Education Networks (PEN)
- Potential or actual purchasers of any part of our business or assets, or other third parties in the context of a possible transfer or restructuring of our business.

If you choose not to give your personal information

If you choose not to give us your personal information, it may delay or prevent us from being able to comply with our own legal obligations. It may also result in us being unable to, or refusing to, engage you or your organisations as a client.

Automated decisions

We do not envisage taking any decisions about you based solely on automated processing (i.e. without human involvement), which have a legal or similarly significant effect on you.

How long we keep your personal information

We will only retain your personal information 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.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In general terms, we will hold information for so long as you continue to provide us with products and services and for an additional period of six years thereafter.

International transfers

As a global company, we hold some personal information concerning our suppliers and their affairs within the United Kingdom. We do work with agents and service providers who may process your personal information on our behalf outside the UK. If your information is processed outside the UK, we will ensure that it is protected to the same standards as if it were being processed within the UK by putting in place a contract with our agents and service providers that provides adequate safeguards, such as Standard Contractual Clauses or equivalent measures.