

Privacy Information for Students and Applicants

This privacy notice applies to current and former students and applicants. It explains how we'll process your personal data. This notice does not form part of any student or applicant contract.

What information do we hold?

We hold a range of personal data about you, some of which you provide to us directly and some of which we receive from third parties.

Here are some examples of types of personal data we hold:

- your contact details
- prior educational experience and attainment
- immigration information (such as passport details and language proficiency)
- where relevant, health information (including any disabilities) and other equality monitoring data you provide to us

In addition, if you come to study with us, we'll start keeping data like:

- academic performance
- attendance and progression
- if it's relevant, breaches of our policies (such as academic or other misconduct concerning University activities)

We also process contact and educational details after you stop being a student with us.

How do we use it and why?

When you're an applicant, we process your personal data for the purposes of assessing your eligibility to be offered a place on one of our academic programmes and for identifying any support needs you may have.

If you accept a place on a course and/or register as a student at the University, we process your personal data for the purposes of providing our academic programmes and related services, such as welfare support.

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 wouldn't be able to provide you with your chosen academic programme and related support services.

Some personal data is also required to fulfil our legal obligation regarding immigration. A failure to provide that information would interfere with your application for a visa to enter Gibraltar.

We only process data for specified purposes and if it is justified in accordance with data protection law. The table below lists examples of personal data we process and the justification for it.

Purpose of data use and justifications	
Purpose	Legal basis and justification
Assessing eligibility to undertake our academic programmes	Consent and/or processing is necessary for the purposes of taking steps prior to entering into a contract with us
Provision of academic programmes and related services (including IT and library services)	Necessary for performing a contract - in other words to provide your chosen academic programme. This can be a contract with us or a contract between you and your sending institution. This is called contractual necessity
Assessment of academic progress and performance (including attendance)	Contractual necessity
Administration of complaints, grievances and appeals	Contractual necessity
Immigration matters	Necessary for us to comply with our legal obligation in relation to students or applicants who hold visa to enter Gibraltar. Such processing may also be in the public interest and your consent may be required in some cases
Making reasonable adjustments for disabilities and providing relevant support to students or applicants with ill health	Consent
Regulating the University's community (including dealing with misconduct under our procedures for academic and other misconduct)	Contractual necessity and our legitimate interest in maintaining academic standards

Obtaining payment of fees	Contractual necessity and our legitimate interest in obtaining payment for the services we provide
Protecting our property and assets (for example by dealing with misconduct)	Necessary for our legitimate interest in safeguarding our property and assets
Providing appropriate IT and other infrastructure facilities, for example a virtual learning environment, as well as the development of new IT systems	Contractual necessity; legitimate interest in providing a proper infrastructure to support the provision of academic programmes and related student services
Communicating with applicants and students	Contractual necessity
Assisting applicants and students to obtain residential accommodation/housing	Consent
Careers and Employability Service	Contact details, programme details and progression information where relevant to enable the opportunities offered to students by the Careers and Employability Service
Alumni relations	Necessary for our legitimate interests and by consent for marketing, fundraising and maintaining an alumni network
To provide references on request	Necessary for the performance of the employment contract or where consent has been given
Carrying out internal research and analysis for non-academic purposes including monitoring performance and quality at an institutional level and where there is no direct impact on data subjects	Legitimate interest in ensuring that the University is able to benefit its staff and students through understanding how they are impacted by its practices
Supplying contact details to the relevant tax authority in registered place of residence for Tax Registration purposes	Consent is collected at the point of enrolment. Students that do not wish to consent must still register for Tax purposes, where relevant with the local authority

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 or video of our events and publish them. This is done on the basis of our other policies, and we will inform you about such processing at the time when the data is obtained or as soon as we can afterwards.

Where the basis of processing your personal data is a contractual necessity and you don't provide us with the personal data needed, the University may not be able to process your application or provide you with the programme for which you have applied. A failure to provided immigration-related data may result in failure to obtain a visa to enter Gibraltar for those students who require it.

What information do we get from third parties?

Sometimes we receive your data from third parties. The following table lists what information we may receive from them.

Who we get data from	
Data we may receive	Source
Application data, which includes contact details and attainment, work experience, previous institution, contextual data and disability information	Study portals and other similar organisations
Your immigration status	Gibraltar Borders and Coastguard Agency
Transcripts (details of programmes undertaken or being undertaken at another institution, and your attainment)	Another institution and/or secondary schools
Medical, accessibility related and similar information, occupational health medical clearing (we only obtain this information from third parties if you give us consent to do so)	Another institution, medical practitioners and/or family members
Your financial status	Respective Financial Institution / Department of Education
Details as to how you are performing in your apprenticeship	Your employer if you are an apprentice
Details of performance in foundation courses	Other partner institutions and agents
Details of performance in other educational institutions or in relevant jobs	Referees you have identified

Information relating to criminal convictions	Royal Gibraltar Police
Accreditation information	Relevant professional accrediting bodies

Who do we share it with?

Sometimes we may need to share your data. The following table gives examples of this kind of data sharing.

Who we share data with	
Recipients	Data which we may share with them
Our academic staff	Contact details, attendance and progression information, education and attainment data, and where necessary for the implementation of reasonable adjustments and/or the provision of other support and subject to your consent health information. Your contact details may also be used by these staff when recruiting to related extra-curricular activities, such as volunteering opportunities
Our administrative and support staff	Contact details, immigration details, attendance and progression information, education and attainment data, and where necessary for the implementation of reasonable adjustments and/or the provision of other support and subject to your consent health information. Your contact details may also be used by these staff when recruiting to related extra-curricular activities, such as volunteering opportunities
Our alumni team	Contact details, attendance and progression information
Employment or study placement providers	Your CV as well as any accessibility and assistance requirements and related information
Co-curricular and/or extracurricular excursion providers	Accessibility and assistance requirements and related information
Your employer if you are an apprentice	Details as to how you are performing in the academic part of your apprenticeship

Future employers	Personal information relating to conduct, performance and academic achievement, where we are asked for a reference
University league table compilers, for example The Economist, Financial Times and organisations compiling graduate destination data	Contact details and employment or further study destination data
Official bodies to which the University is obliged to report	Information supplied as necessary to fulfil the University's reporting obligations to these bodies. This may include relevant special category data where necessary.
External examiners	Identification details and exam papers
Civil Status Registration Office	Passport details, programme details and fees, and housing details
Tutors in Halls of Residence	Student details
Housing providers	Student details
Data processors (in other words third parties who process personal data on our behalf such as software providers)	Application details, attendance records
Local Authority	Contact details
Research partners	Contact details, attendance and progression information
Regulatory and accrediting bodies, where you are on a professionally accredited programme, for example the GMC	Contact details, attendance and progression information
Funding bodies, scholarship and bursary providers	Contact details, attendance and progression information
Government agencies, (only upon request and where	Contact details

there is a legal basis for doing so)

Police (only upon request and where there is a legal basis for doing so)

Information supplied as necessary in order to fulfil the University's legal obligations with respect to fire prevention and detection of crime

When do we transfer data overseas (outside of the European Union)?

As shown in the table above, we will share your data with your placement provider, who may be outside of the EEA, on the grounds that such transfer is necessary for performing our contract with you.

How long do we keep your data?

Usually application-related personal data will be kept for around one year.

Contractual information (for example details of your attendance, performance and contact details) is retained for six years after you have completed or otherwise terminated your programme. Retention periods are usually linked to legal limitation (statute of limitation) periods. [The University's records retention schedule is available upon request.](#)

Personal data held in connection with our alumni office will be retained in support of your lifelong relationship with the University, or until there is no longer a legal basis for holding it (for example if you withdraw your consent).

Where can I get more information?

If you have any questions about this policy, please [contact the Information Compliance team.](#)

We will keep this privacy notice under regular review and we will place any updates on this web page. This privacy notice was last updated on 22 January 2019.