

Data Privacy Notice & Consent Policy

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| Policy no: | 6.01 | Version number | V1.2 |
| Version date | July 2024 | Next review | July 2025 |
| Owned by | Chief Executive Officer | Approved by | Senior Leadership Team |
| Key Contacts | Data Controller: academics@lckacademy.org.uk Data Protection Officer: Head of IT shafraz@lckacademy.org.uk | | |
| External reference points | <p><u>Data Protection Act 25 May 2018</u></p> <p>Information Commissioners Office (ICO) If you operate inside the UK, you need to comply with the Data Protection Act 2018 (DPA 2018). The provisions of the EU GDPR have been incorporated directly into UK law as the UK GDPR. In practice, there is little change to the core data protection principles, rights and obligations</p> <p><u>GDPR 7 Laws</u></p> <ul style="list-style-type: none"> • Lawfulness, fairness and transparency. • Purpose limitation. • Data minimisation. • Accuracy. • Storage limitation. • Integrity and confidentiality (security) • Accountability. <p><u>OfS Condition C1</u></p> <p>The provider must demonstrate that in developing and implementing its policies, procedures and terms and conditions, it has given due regard to relevant guidance about how to comply with consumer protection law.</p> <p><u>UK Quality Code for Higher Education 2024 Principle 4</u></p> <p>When designing and operating monitoring and evaluation arrangements, staff and students adhere to ethical and data protection requirements relating to gathering and submitting data for national data sets, regulatory purposes, and internal monitoring and evaluation.</p> <p>LCK Academy Ltd trading as LCK Academy is registered with the <u>Information Commissioner's Office</u> as a data controller (Registration reference: ZB562779).</p> | | |

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1. Background and Purpose

This privacy notice explains the rights of a student, member of staff or other stakeholder of LCK Academy ('LCKA 'or 'the Academy') regarding their personal information as well as what to anticipate when the Academy collects it. The Academy complies with its legal duties under English law while handling any personal information. Every effort is made to uphold the right to privacy and safeguard the personal data of individuals. The Academy is registered with the Information Commissioner's Office (ICO) **No. ZB562779** and has designated a Data Protection Officer (DPO) to oversee the protection of all data in accordance with the Act.

Any modifications to this policy must be approved by the **Data Protection Officer:** shafraz@lckacademy.org.uk

2. Aims and Objectives

This policy outlines the legal grounds for processing the data of individuals and applies to the information people choose to share with us or permit us to collect. This includes the following (as a student):

- Information provided during the application and enrolment process
- Information provided during the creation of campaigns
- Information provided in the form of numerical data, messages, or metadata
- Information collected regarding people's use of our website
- Information related to purchases and other transactions
- Information given and stored as part of our ongoing relationship

3. Application

This policy applies to LCK Academy users and any person who has registered with LCK Academy as a user, student, administrator, or in any other role is subject to the terms and conditions of this policy. The information provided will be used and shared in line with this policy and this agreement outlines how LCK Academy will interact with its stakeholders.

4. Privacy Statement

We respect the right to privacy and will only use the data we collect about individuals to manage their account and deliver the services they have requested. Personal information will never be sold, shared, or used for any purpose other than those mentioned above.

5. How we operate

This organisation adheres to the UK Data Protection Act (May 2018) concerning data protection. It respects individuals' privacy rights and allows them to modify or withdraw their opt-in choices at any time. Furthermore, the organization provides guidance on how to file a complaint with the appropriate authorities, specifically the Information Commissioner's Office.

6. Scope of Consent and Opting Out

A user or student who submits personal information to an LCK Academy website expressly consents to the use of that information in line with this privacy policy. They will have the option to withdraw their permission via the procedures outlined.

Consent may be changed or withdrawn at any moment after it has been granted. Objections to processing are also possible at any point. We uphold every user's right as outlined in the Data Protection Act 2018.

7. Storing and Processing Personal Data

Data will be collected stored and processed in the UK only and will be kept on file for a maximum of seven years following the last known login attempt. We work with reputable third parties to handle payment processing, account management, and banking services to provide users with relevant information and offers. Transaction, payment, and order data will be retained for a maximum of seven years or as mandated by UK financial and company regulations.

Please note that except as indicated here, no third parties are granted access to personal data. Additionally, no personal information will be shared with other companies for their sales or marketing activities.

8. Our obligations

A Data Protection Officer has been appointed, and the LCK Academy is legally responsible for handling the information provided. The Academy's Compliance with the Data Protection Act 2018 (DPA) regarding the use and sharing of personal data is monitored by the DPO. The DPO ensures that personal data of individuals will be used:

- Fairly and lawfully
- As specified in the DPA and this policy
- To the extent necessary for the purpose that it was collected and no other reason
- For no longer than is necessary

The Academy will act as the data processor and will take reasonable precautions to safeguard the personal information provided by individuals. LCK Academy may request consent to utilise personal information for purposes such as marketing, account management, or relationship management. The primary objective is to inform individuals about services that may be of interest to them and to sustain any existing relationships with them. Consent will always be obtained before utilizing the personal data of individuals of any reason.

9. Legitimate interests

The Academy is permitted under the Data Protection Act to share certain information with third parties for non-marketing purposes (such as debt collection, asset recovery, fraud prevention, identification, and credit and risk assessment and management).

10. Contacting us, exercising information rights, and complaints

For inquiries or comments regarding this Privacy Policy, or to exercise information rights concerning shared personal data or to lodge a complaint, individuals should contact the Data Protection Officer at LCK Academy. Subject Access Requests (SARs) will be processed within 20 days. SAR responses are generally free of charge, although a reasonable fee no greater than £100 may be charged for excessive or unfounded requests. LCK Academy adheres to Data Protection legislation and will cooperate with any investigations or requests made by the relevant authorities.

11. What information do we collect about people?

Information about students is collected during inquiries, applications, and enrolments in courses. Additional information is gathered when students voluntarily complete learner satisfaction surveys, provide feedback, or participate in competitions.

The personal data collected about employees and students includes:

- Name
- Job title
- Date of birth
- Passport information
- National Insurance Number
- Nationality
- Status
- Share Code
- Home address
- Home telephone number
- Private email address
- Emergency contact information
- Bank details

Special categories of personal data collected may include protected characteristics including

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

The collection of sensitive data may be necessary to deliver services, provide courses or qualifications, monitor and review quality or comply with awarding and regulatory bodies.

When collecting sensitive data, the purpose, location, and storage method of the information must be communicated. The legal justification for collecting this data must be thoroughly examined.

15. Why do we hold information about people?

The Academy is required to share personal information with awarding organizations and public regulators for higher education, such as the Office for Students and the Higher Education Statistics Agency (HESA), in compliance with legal obligations, including those outlined in the Higher Education and Research Act 2017. These bodies also monitor compliance with the 'prevent' duty under the Counter Terrorism and Security Act 2015.

Information will be also shared with organizations directly involved in funding, educational support, and guidance in accordance with the Academy's Data Protection Policy . Processing this data allows for the monitoring of the Academy's performance and supports effective operations and future planning.

Note that information collected about students during their learning, including inquiries and applications, will be used for academic and administration purposes, including guidance, statistical analysis, health and safety and well-being of students.

16. How will people s information will be used?

| Purpose/Activity | Type of data | Lawful basis for processing |
|---|--|---|
| To register someone as a new student | (a) Identity, (b) Contact | Performance of a contract with people |
| To manage payments, and fees, and to collect and recover money owed to LCKA | (a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications | (a) Performance of a contract with them, (b) Necessary for our legitimate interests to recover debts owed to us |
| To manage our relationship with people which will include notifying them about changes to our terms or privacy policy, and asking them to leave a review or take a survey | (a) Identity, (b) Contact, (c) Profile, (d) Marketing and Communications | (a) Performance of a contract with people, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how students use our services |
| To enable people to partake in an event, seminar, competition or complete a survey | (a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications | (a) Performance of a contract with people, (b) Necessary for our legitimate interests to monitor how students use our products/services, to develop them and grow our business |
| To administer and protect our business and our site (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, and 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 content and advertisements to people and measure and understand the effectiveness of our advertising | (a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing and Communications, (f) Technical | Necessary for our legitimate interests to study how students use our services, to develop them, to grow our business and to inform our marketing strategy |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | (a) Technical, (b) Usage | Necessary for our legitimate interests to define the types of students for our services, to widen participation, to keep our site updated and relevant, to develop our business and to inform our marketing strategy |
| To make suggestions and recommendations to people about services that may be of interest to them | (a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Profile | Necessary for our legitimate interests to develop our products/services and grow our business |

The Academy may process an individual's personal data without their knowledge or consent when required or permitted by law. This includes:

- Administering finances (e.g., fees, contracts, payroll, and payments)
- Providing support services
- Providing IT and information services
- Managing accounts
- Monitoring equal opportunities
- Conducting research and statistical analysis
- Providing operational information
- Promoting and marketing our products and services
- Ensuring safeguarding and compliance with Prevent duty
- Maintaining security
- Preventing and detecting crime
- Serving legitimate interests

Individuals agree to the Academy storing and using their information by accepting a place in an Academy course. Permission to record audio or video for assessment purposes may also fall under this category. The Academy reserves the right to revoke any current offer of admission and to refuse an offer if they choose not to grant this consent. **Contact the Data Protection Officer at shafraz@lckacademy.org.uk with any concerns.**

17. Student loan company, local authority and sponsoring body

If a student's is eligible for financial support, the Academy might be obligated to provide information about their attendance and performance upon request to their sponsor, embassy, and/or the Student Loan Company (SLC). Reports may also be given to a sponsoring organization, employer, or local authority if the requirements of the student's sponsorship include receiving updates on their progress.

To assess a student's eligibility for financial assistance, the Student Loans Company provides information to the Academy based on information the student has provided.

18. Debt collectors

If the Academy is unable to collect the owed amount from the debtor directly, it may disclose the debtor's information to a debt collection agency designated by the Academy. The student will be notified via email by the finance department about any outstanding balances, offering a chance to discuss establishing a payment plan. Failure to respond, communicate, or comply with the payment plan may result in the Academy sharing their information with the debt collection agency, potentially impacting on their credit score.

19. Police

In certain situations, the Academy might have to give personal information to the police or courts to prevent crime or in an emergency to safeguard someone's important interests.

20. Plagiarism and AI detection

The Academy retains the authority to utilise electronic 'Turnitin' plagiarism detection software. This facilitates systematic checks for plagiarism by comparing students' submitted work with online sources, databases, and other students' work.

21. Marketing

In some instances, the Academy may wish to inform students about its courses and events via email addresses they have provided. Students have the option to refuse to receive such communications at any time.

Students will receive marketing messages if they have:

- Expressed interest or purchased services from the Academy;
- Given their details and consented to marketing communications by selecting the appropriate option while providing their information; and
- Not chosen to opt out of such communications.

Choosing to opt out of marketing communications will not impact the personal information provided during service procurement. To stop receiving marketing messages, students can send an email to info@lackacademy.uk and request removal from marketing lists. The Academy's website utilises cookies to improve user experience. It does not directly retain IP addresses but relies on Google Analytics to enhance user experience.

22. What are student rights?

Students are entitled to the following:

- to access their own personal data,
- express objections to the handling of such data,
- correct inaccuracies, request deletion or restriction of processing and transfer of their personal information.

To make any requests or express objections, students should use the following address: info@lckacademy.org.uk. Students may also complain using the Complaints Policy on the LCKA [website](#).

23. Security of information

Appropriate security measures have been implemented to safeguard individuals' personal data against accidental loss, unauthorised access, alteration, or disclosure. Access to personal data is restricted to employees, agents, contractors, and third parties with a legitimate business need, who will handle such data according to our instructions and under a duty of confidentiality.

Any breaches or potential breaches will be promptly reported to the relevant authorities within 24 hours, and affected parties will be notified within 72 hours. Individuals with inquiries or concerns regarding their data usage are encouraged to contact us. The LCKA website may contain links to third-party websites, plugins, and applications, which may collect or share data when clicked or enabled. The Academy does not oversee these third-party websites and disclaims responsibility for their privacy policies. Upon leaving the LCKA website, individuals are advised to review the privacy notices of any subsequent websites they visit.

DATA SUBJECT CONSENT FORM – FOR COURSE ADMINISTRATION & REPORTING

LCK Academy

The Bridge
Christchurch Avenue
Harrow
HA3 5BD

Full name of the individual signing this form:

Address

Consent Agreement

I hereby acknowledge my consent in respect to LCK Academy collecting, using, storing and deleting my personal data to run, monitor, and report on academic programmes for seven years. I understand that Awards data needs to be kept indefinitely. I will transfer my data for use of the data within the purposes described here to an authorised member of the LCK Academy team ensuring that the data is processed in compliance with the requirements of the GDPR data protection regulations.

Contact details of the student or stakeholder

Email _____

Phone no _____

I have made available my personal data to LCK Academy. I understand that I am entitled at any time to request an update of my data, and information regarding the use of my data, as well as to withdraw the consent provided hereby and deletion of my data and all rights under the GDPR.

Name

Date

DATA SUBJECT CONSENT FORM – FOR PROMOTIONAL ACTIVITIES

LCK Academy

The Bridge
Christchurch Avenue
Harrow
HA3 5BD

Full name of the individual signing this form:

Address

Consent Agreement

I hereby acknowledge my consent in respect to LCK Academy collecting, using, storing and deleting my personal data for the Academy’s promotional activities.

Contact details of the student or stakeholder

Email _____

Phone no _____

I have made available my personal data to LCK Academy. I understand that I am entitled at any time to request an update of my data, and information regarding the use of my data, as well as to withdraw the consent provided hereby and deletion of my data and all rights under the GDPR.

Name

Date