

## **Glasgow Caledonian New York College**

### **EU-GDPR Student Privacy Notice**

This Notice describes Glasgow Caledonian New York College's practices with respect to the collection, use, storage, and disclosure ("processing") of Personal Information covered by the European Union's General Data Protection Regulation for purposes of recruiting and evaluating prospective students and processing applications for admission. This Notice applies to GCNYC, with headquarters at 64 Wooster Street, Ground Floor, New York, New York 10012, as well as to its affiliated legal entities and foreign branches (collectively "GCNYC," "us" or "our") with respect to prospective students and their families located in the European Union, Iceland, Norway, Liechtenstein, and Switzerland. All such prospective students and their families (referred to below as "you" or "your") should carefully read the provisions of this Privacy Notice.

"Personal Information," as used in this Notice, means any information that can be used to identify you, whether directly or indirectly, including by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

## **Questions?**

You can contact GCNYC's Data Protection Officer with any questions about this notice, our data collection practices, or your rights. You can reach GCNYC's Data Protection Officer, Stephen Lopez, at:

s.lopez@gcu.ac.uk

This general notice may be supplemented by additional notices at the point of any data collection. If you have specific questions about any of the data processing activities described in this or any other notice, please contact the DPO.

## **The Information We Process About You**

We process the information we collect from you directly, either during our communications with you about GCNYC or as part of your application to GCNYC, including applications for financial aid. In addition to submitting an application directly to us, you may submit an application via third party sites through which GCNYC collects prospective student information or financial aid related data.

During the application process, we will indicate when certain information is required in order for GCNYC to process your application. Failure to complete a required field may result in your application being denied or your ineligibility for financial aid.

We use automated decision making processes to screen applicants for both admission and

financial aid according to predetermined criteria. For example, your grades or test scores are automatically evaluated to determine your eligibility for consideration for admission. Similarly, the information in your financial aid application may be used to generate a profile of your financial circumstances that is used to make decisions about your eligibility for scholarships, loans, and other financial assistance. You can find out more about the logic we use in our automated decision-making processes by contacting the DPO.

In addition, we collect the following kinds of information about you from third parties:

- Your contact and demographic information, including publically available information, which we collect from third parties who provide us information about prospective students who may be interested in attending GCNYC. We may also collect this contact information from students about their parents and family members.
- Specific personal background and health details, which we may collect from third parties.
- Information about your prior educational history, which we collect from other educational institutions (or from our own records in the event of a re-enrollment or enrollment for a different degree).

## **Purposes and Legal Basis for Processing Your Data**

We process your Personal Information to recruit prospective students, evaluate applications for admission to GCNYC, evaluate your eligibility for financial aid, communicate with you about GCNYC and your application, and, if you are admitted to GCNYC, to award you financial aid and to enroll you in GCNYC programs if you choose to attend. We also use this data to:

- administer programs and make decisions about course offerings,
- file required reports with applicable governmental authorities,
- administer our programs and provide appropriately tailored services, including student health services, financial aid, and research and reporting activities,
- monitor trends within incoming classes,
- report application and admission statistics to appropriate publications,
- plan course offerings,
- verify identity,
- ensure that the university is prepared for emergencies, and
- enforce GCNYC policies and applicable laws.

We combine the data that we collect in order to provide these functions. We have the following legal basis for processing the information you provide us in your application or that we collect about you during the application process.

We have a legitimate interest in recruiting and admitting qualified applicants, complying with laws and regulations that govern our conduct in the countries where we operate, and administering GCNYC and its programs in an efficient, ethical, and appropriate manner. We process all the information we collect from or about you to meet these purposes. You can

obtain additional information about the legitimate interests we have in processing your information by contacting the DPO.

Once you have accepted an offer of admission from us, we may also be required to process your Personal Information to complete a contract that you have entered into with us, including to be admitted to a program, or receive financial aid, housing, or another service from us. You can obtain additional information regarding processing we do to enter into contracts with you by contacting the DPO.

In the case of Sensitive Personal Information (which includes (i) information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; (ii) genetic and biometric data, and (iii) data concerning health, sex life, or sexual orientation), we process information because we have your consent to do so.

When we process your Sensitive Personal Information on the basis of your consent, you may withdraw that consent at any time by contacting the DPO. If you withdraw your consent, we may still be required to process your Sensitive Personal Information to comply with applicable law, but we will explain to you at the time your consent is withdrawn what processing activities will continue for legal compliance purpose.

Finally, we process your Personal Information for additional purposes that are compatible with those already described, including for the purposes of conducting scientific, statistical, or historical research or for the purpose of creating archives in the public interest. Where possible, we do not use identifiable information for these purposes, or we take steps, including making use of pseudonymous data, to limit the amount of Personal Information we use in our research or archives.

## **Recipients of Your Personal Information**

Your Personal Information will be received and processed by GCNYC employees and personnel, including third parties who provide services to GCNYC in connection with the purposes of processing described above, including third-parties that provide us with technical support for the application process, and provide us with application collection services. We share your Personal Information with our service providers only when they have agreed to process your Personal Information only to provide services to us and have agreed to protect your Personal Information from unauthorized use, access, or disclosure. We provide Personal Information to partner universities for group travel and collaborative events; research partners; printers and mailing houses. You may contact the DPO to learn more about the categories of service providers to whom your data is disclosed.

We also disclose your information to government authorities as required by laws that regulate higher education, immigration, tax, national security, and criminal activity.

## **Data Retention**

You can find information about how long we retain personal data by consulting our [Record](#)

[Retention Policy](#). You can obtain additional information about any of these retention periods by contacting the DPO.

## Your Rights

You have the right to the following information regarding GCNYC's processing of your Personal Information:

- the purposes of the processing,
- the categories of Personal Information concerned,
- the recipients or categories of recipients to whom the Personal Information have been or will be disclosed,
- where possible, the envisaged period for which the Personal Information will be stored, or, if not possible, the criteria used to determine that period.

This Data Privacy Notice is intended to provide this information. Any questions about these details may be directed to the DPO.

You also have the following additional rights with respect to your Personal Information

- The right to request access to the Personal Information that GCNYC has about you, as well as the right to request rectification of any data that is inaccurate or incomplete.
- The right to request a copy of your Personal Information in electronic format so that you can transmit the data to third parties, or to request that GCNYC directly transfer your Personal Information to one or more third parties.
- The right to object to the processing of your Personal Information for marketing and other purposes.
- The right to erasure of your Personal Information when it is no longer needed for the purposes for which you provided it, as well as the right to restriction of processing of your Personal Information to certain limited purposes where erasure is not possible.
- The right to lodge a complaint with the supervisory authority for the country where you live or work or where you believe that your rights have been violated. You may consult a list of [data protection authorities](#).