



Matrix College of Counselling and Psychotherapy
Applicants & Prospective Students Privacy Notice

This privacy notice applies to applicants and prospective students

You should note that:

1. A separate notice applies to users of our website, which explains how we monitor usage of our website. You can find that notice at www.matrix.ac.uk
2. After applicants accept an offer to study with Matrix College, and/or they enrol as a student with Matrix College, a further notice (Student Data Privacy Notice) applies. You can find that at www.matrix.ac.uk

A summary of what this notice explains:

Matrix College is committed to protecting the privacy and security of personal data.

This notice explains what personal data the College holds about you, how we use it internally, how we share it, how long we keep it and what your legal rights are in relation to it.

For the parts of your personal data that you supply to us, this notice also explains the basis on which you are required or requested to provide the information. For the parts of your personal data that we generate about you, or that we receive from others, it explains the source of the data.

There are some instances where we process your personal data on the basis of your consent. This notice sets out the categories and purposes we use your data for where your consent is needed.

What is your personal data and how does the law regulate our use of it?

“Personal data” is information relating to you as a living, identifiable individual. We refer to this as “your data”. It can include information such as your name, contact details, education history and other information about you that we may process.

“Processing” your data includes various operations that may be carried out on your data, including collecting, recording, organising, using, disclosing, storing and deleting it.

The law requires us:

- To process your data in a lawful, fair and transparent way.
- To only collect your data for valid purposes that we have told you about.

- To only collect data that is relevant, and limited to the purpose(s) we have told you about.
- To ensure that your data is accurate and up to date.
- To ensure that your data is only kept as long as necessary for the purpose(s) we have told you about.
- To ensure that appropriate security measures are used to protect your data.

Data that you provide to us and the possible consequences of you not providing it

The College will collect, store and use the following categories of information about you as an applicant:

- Details you provide to the College when you submit your application, including:
 - personal contact details such as name, title, addresses, telephone numbers and personal email addresses, age and date of birth, gender, nationality, country of birth.
 - information about your previous education and work experience; and
 - your qualifications.
- Details of your engagement with, and outcome of, the applications procedure, including interviews, selection tests, health declarations and any other suitability assessments.
- Your interactions with the College and other general correspondence relating to your application.

If you do not provide us with information that we ask for during the applications process:

- If you are a prospective student wanting to attend a Taster day, it may mean that you cannot attend, depending on the type of information we requested.
- If you are an applicant wanting to study with us, it may mean that we reject your application, depending on the type of information we requested.
- If you are an applicant who ultimately registers as a student of the College, failure to provide information during the applications process which is material to the College's ability to assess in a properly informed manner your suitability for your course may result in your registration being terminated at a later date.

Other sources of your data

Apart from the data that you provide to us, we may also process data about you from a range of sources. These include:

- Your school or previous educational establishments or employers if they provide references or qualifications data to us.
- Your family members, guardians, friends, referees, and other contacts who may provide us with information about you if and when they contact us, or vice versa.

The lawful basis on which we process your data

The law requires that we provide you with information about the lawful basis on which we process your personal data, and for what purposes.

Most commonly, we will process your data as an applicant on the following lawful grounds:

- Where it is necessary to take steps at your request prior to entering a contract (that is to say, to determine whether to make an offer for you to study at the College).
- Where it is necessary for our legitimate interests (or those of a third party, including Middlesex University as validating institution of the College's programmes) and your interests and fundamental rights do not override those legitimate interests.
- Where necessary to comply with a legal obligation.

We may also use your data, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests, or where it is needed in the public interest for official purposes. In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent.

How we apply further protection in the case of "Special Categories" of personal data

"Special categories" of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.

We may also collect, store and use the following types of special category personal information through the routes above:

- Information about your race or ethnicity, religion or beliefs, marital status, gender and sexual orientation.
- Information about your health, including any medical condition, health and sickness records.

We process special categories of personal data with your explicit consent, or in the following circumstances:

- Where it is necessary in the substantial public interest, and further conditions are met (including but not limited to assessing your suitability to work with vulnerable people and your fitness for entry into the counselling profession).
- For archiving or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law.
- For the establishment, exercise or defence of legal claims.
- To protect your or another person's vital interests and you are not capable of giving consent.
- To offer you relevant support or reasonable adjustments in the case of information about your health.

We have in place an appropriate policy document and other safeguards which we are required by law to maintain when processing such data.

Criminal convictions and allegations of criminal activity

Further legal controls apply to data relating to criminal convictions and allegations of criminal activity.

We may hold and process data about criminal offences or convictions if you have disclosed this in the application process. We will use information about criminal convictions and offences to consider your suitability to study on the programme applied for on the same grounds as those identified for "special categories" referred to above.

Details of our processing activities

The information below includes detailed information about how we process various categories of data if you are an **applicant**:

- To consider your suitability for your application.
- To enable you to participate in Taster days and other application events such as interviews.
- To communicate with you in relation to progress and outcome of your application.
- To comply with our statutory obligations and legal responsibilities.
- To comply with our wider regulatory requirements.
- To compile statistics and research to further the College's business.

How we share your data

Within the College, your data is shared only with those College staff who need to access it for admissions purposes, and/or to discuss any support needs you may have.

We will not sell your data to third parties. We will only share it with third parties as it necessary for the purposes set out above and if we are allowed or required to do so by law. This includes, for example:

- Relevant Government Departments, executive agencies, or non-departmental public bodies (for example, where we are required to report information about students that are subject to visa controls to UK Visas and Immigration).
- Relevant higher education bodies (for example, the Office for Students, and the Higher Education Statistics Agency).
- Middlesex University, in order to facilitate its validation and conferral of awards on programmes of study.
- Any relevant professional or statutory regulatory bodies (for examples, UKCP and BACP)
- Occasionally and where necessary, the police and other law enforcement agencies, for the prevention or detection of crime.
- Occasionally and where necessary, internal and external auditors or regulators.

It also includes disclosures where the third party is an agent or service provider appointed by the College to enable us to operate effectively, provided we are satisfied that appropriate safeguards have been put in place to ensure adequate levels of security for your data. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies and are only permitted to process your personal data for specific purposes in accordance with our instructions. We do not allow our third-party providers to use your personal data for their own purposes.

Sharing your data outside the UK

The law provides various further safeguards where data is transferred outside of the UK.

In the case of **applicants**, when you are resident outside the UK in a country where there is no "adequacy decision" by the European Commission, and an alternative safeguard is not available, we may still transfer data which is necessary for the implementation of pre-contractual measures, or for your application with us.

We may transfer your data outside the UK, but only for the purposes referred to in this notice and provided either:

- There is a decision that the level of protection of personal data in the recipient country is adequate; or
- Appropriate safeguards are in place to ensure that your data is treated in accordance with UK data protection law, for example through the use of standard contractual clauses; or
- There is an applicable derogation in law which permits the transfer in the absence of an adequacy decision or an appropriate safeguard.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

We do not envisage that any decisions will be taken about you based solely on automated means, however we will notify you in writing if this position changes.

How long we keep your data

Successful applicants who enrol: we will retain the personal data collected during the admissions process for 10 years after the start of the academic year in which you are admitted to the College. We retain your data for this period so we can respond to any queries you or a third party may have about your studentship, including qualifications, to prepare references, to respond to any concern or complaint. We may be required by law to keep some data for longer e.g., to comply with external regulatory or Governmental requirements.

Unsuccessful applicants: for 12 months after the end of the application cycle. We retain your data for this short period so we can respond to any queries you may have about your application.

Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.

Taster day applicants: 12 months after the Taster day.

After the periods specified above, we will securely destroy your personal data.

Please note that we may keep anonymised statistical data indefinitely, but you cannot be identified from such data.

Your legal rights over your data

Subject to certain conditions set out in UK data protection law, you have:

- The **right to request access** to a copy of your data, as well as to be informed of various information about how your data is being used.
- The **right to have an inaccuracies in your data corrected**, which may include the right to have an incomplete data completed.
- The **right to have your personal data erased** in certain circumstances.

- The **right to have the processing of your data suspended** in certain circumstances, for example if you want us to establish the accuracy of the data we are processing.
- The **right to receive a copy of data you have provided to us** and have that transmitted to another data controller (for example, another University or College).
- The right to object to any direct marketing (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- The **right to object to the processing of your information** if we are relying on a 'legitimate interest' for the processing or where the processing is necessary for the performance of a task carried out in public interest.
- The **right to object to any automated decision making** about you which produces legal effects or otherwise significantly affects you.
- Where the lawful basis for processing your data is **consent**, you have the **right to withdraw your consent at any time**. When you tell us you wish to exercise your right, we will stop further processing of such data. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent. You may withdraw your consent by contacting the College's Administrator, using the contact details given above.

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk/>). You may also wish to contact the College's Administrator (contact details given above) if you are considering how or whether to exercise your rights.

You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office if you believe that your data has been processed unlawfully.

Future changes to this privacy notice, and previous versions

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes, or to make Matrix College's or (as validator of the College's programmes) Middlesex University's operations and procedures more efficient. If the change is material, we will give you not less than two months' notice of the change so that you can decide whether to exercise your rights, if appropriate, before the change comes into effect. We will notify you of the change by email.

Matrix College's Contact Details

If you need to contact us about your data, please contact:

**The Administrator
Matrix College
6 Griffin Court
Wymondham
Norfolk
NR18 0GU**

nikkita@matrix.ac.uk

For review June 2021

~~FP/AD-September-2019~~

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