

ThinkSpace Education Privacy Notice

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Last amended by: Tim Johnson

1 Policy Statement

- 1.1 This Privacy Notice ("Notice") sets out what personal information ThinkSpace Education Ltd ("TSE", "We", "us", "our") collects and how that information is processed when you visit the websites located at <https://www.thinkspace.ac.uk> ("Sites") and/or the services provided from the Sites ("Services").
- 1.2 This Privacy Notice describes, in a clear and accessible way, how TSE complies with data protection legislation. This includes the purposes and legal basis for each type of processing, any transfers or third party recipients of personal information, and the timescales for storing and processing them. This Policy also outlines your rights and obligations regarding data protection.
- 1.3 This Privacy Notice applies to all applicants, students, alumni, subscribers and anyone else about whom TSE may have reasons to collect and process data, including personal information, either online and/or offline.
- 1.4 TSE is committed to protecting and respecting your privacy. We only collect personal information necessary to provide the services that you requested, the use of your personal information will not be excessive and we take reasonable security measures to protect it. If we require your consent for any specific use of your personal information, we will collect it at the appropriate time and you can withdraw it at any time. We do not sell your personal data to third parties under any circumstances or use your personal information to carry out any wholly automated decision-making that affects you.
- 1.5 This Statement applies only to this website. For example, it does not apply to banners, advertisements or promotions we may sponsor or participate in on websites owned by third parties. Other websites linking to or from this website may have different policies and we are not responsible for the privacy practices of such other sites. You should read any other applicable privacy policies carefully before using other websites.
- 1.6 TSE is registered as a data controller with the Information Commissioner's Office ("ICO") with registration number ZB186046.
- 1.7 Where TSE staff use AI-assisted tools in the course of their work, no personal information is entered into such tools unless the tool has been approved by TSE and appropriate data protection safeguards are in place. Further detail is set out in the TSE Online Safety Policy.

2 What is 'Personal Information'?

- 2.1 'Personal information' refers to any information which relates to or identifies you as an individual ("Data subject") of which the following are examples: names, photographs, addresses, phone numbers, emails, IP addresses, payment details, social media account ID, screen name/nickname, passport details, browser and device information, server log file information and information collected through cookies.

3 Your Rights and Obligations

- 3.1 You have the following rights (all of which are qualified in different ways) under Data Protection law:
 - (a) to be informed about how your personal information is being used

- (b) to access the personal information we hold about you
 - (c) to request the correction of inaccurate personal information we hold about you
 - (d) to request we delete your personal information, or stop processing/collecting it
 - (e) to withdraw consent to receiving marketing communications from us
 - (f) to request we transfer or port elements of your data either to you or another service provider
 - (g) to complain to your data protection regulator — in the UK, this is the ICO
 - (h) to request information about the reasoning behind any automated decision
- 3.2 It is also your responsibility to ensure the information about you that is held by TSE is correct and up-to-date. Please keep us informed of any changes to your personal information by writing to us, or if you have an account with us, by logging into your account to edit your profile.

4 When Do We Collect Information From You?

- 4.1 Information is crucial to ensuring we can understand, tailor, and deliver the best services to you. It helps us operate as efficiently as possible and to make sure our interactions with you are timely and relevant to you. To do this, we may collect information about you when you:
- (a) visit our website
 - (b) subscribe to our newsletter
 - (c) access our free offerings
 - (d) participate in our competitions
 - (e) register for an event hosted by us
 - (f) attend an online open day
 - (g) enrol on/register for a course
 - (h) enquire about a course
 - (i) engage with us on social media

5 How We Use Your Personal Information (Prospective Students)

5.1 Higher Education programmes

- 5.1.1 TSE will use the personal information you provide on your enrolment/application form (submitted directly to TSE), together with any supporting documents, additional details provided by referee and notes followed by any interview (if applicable), to form part of the admissions process.

5.2 Professional courses

- 5.2.1 TSE will use the personal details you provide on your application form for registration and course administration purposes.

5.3 What is the purpose and legal basis of the processing?

- 5.3.1 TSE will process the personal information and additional information provided on your application for the purposes of identifying you, processing your application, verifying the information provided, deciding whether to offer you a place for the course you have applied for, and communicating that outcome together with any feedback.

5.3.2 We may also use or disclose the information provided for the following statutory or public interest purposes:

- (a) To prevent or detect fraud
- (b) For equal opportunities monitoring
- (c) To help us to make reasonable adjustments for any disability, as requested by you
- (d) To provide statutory returns required by applicable legislation
- (e) For research and statistical purposes, but no information which could identify you will be published

5.3.3 We consider the processing of your personal information for the above purposes to be either necessary for us to take steps with a view to creating a contractual relationship with you (e.g. to assess your application to study with us), or necessary for compliance with a legal obligation (e.g. equal opportunities monitoring), or necessary for the performance of tasks we carry out in the public interest (e.g. admissions research). We require you to provide us with the information we ask for during the application process in order to assess your application properly except where its supply is marked as optional. Admissions decisions are not automated.

5.4 Who will my personal information be shared with?

5.4.1 As well as circulating your application and related materials to the appropriate staff at TSE, we may share your personal information for the above purposes as relevant and necessary with:

- (a) Your referees
- (b) Where relevant and as required and/or notified to you, your school/college or training organisation
- (c) Your examination boards or awarding bodies
- (d) Your student support assessment body
- (e) Your funders and/or potential funders (including, as relevant, the Student Loans Company)
- (f) In the case of international applicants, the British Council or appropriate agencies
- (g) Where relevant and as required, UK Visas and Immigration in order to act as your sponsor for visa purposes
- (h) Where relevant and as required, governmental bodies including local authorities, the Home Office, HMRC and the Department for Work and Pensions and its agencies
- (i) Other Higher Education organisations, in order to assist with tracking and research into access to Higher Education
- (j) Companies or organisations providing specific services to, or on behalf of TSE

5.4.2 If you are accepted for a postgraduate programme, we will use your personal information for the purposes described in the following section 'HE Students'.

6 How We Use Your Personal Information (HE Students)

6.1 TSE will keep a record of the details you provided during the admission process and will also maintain records about your studies at TSE, and your use of the facilities and services that we offer.

6.2 Your personal information is created, stored and transmitted securely in a variety of formats, including our student records databases. Access to your personal information is controlled and limited only to the relevant staff at TSE or those who work on behalf of TSE.

6.3 In addition to this, TSE may process some information about you that is classed as 'sensitive' or 'special category' personal information, and which requires additional protections. This includes information concerning your ethnicity, sexual orientation, religious beliefs or health/disability that we use for obligatory data returns, planning and monitoring purposes, or in order to provide care, help or suitable

adjustments. Access to, and the sharing of, your 'sensitive' personal information is controlled very carefully.

6.4 What is the purpose and legal basis of the processing?

- 6.4.1 TSE will process your personal information for a range of contractual, statutory or public interest purposes, including the following:
- (a) To deliver and administer your education, and record the details of your studies
 - (b) To determine/confirm your academic achievements (e.g. grades)
 - (c) To administer the financial aspects of your relationship with us and any funders
 - (d) To deliver facilities to you (e.g. IT, libraries, VLE, video capture of lectures and masterclasses)
 - (e) To enable your participation at events (e.g. functions, graduation)
 - (f) To communicate effectively with you, including the distribution of relevant announcements and circulars
 - (g) To fulfil our legal obligations to return student data to the Higher Education Statistics Agency (Please refer to HESA's data collection notice) and other relevant governing bodies as required
 - (h) To operate security (including CCTV), governance, disciplinarys (including plagiarism and academic misconduct), complaints, audit and quality assurance processes and arrangements
 - (i) To compile statistics and conduct research for internal and statutory reporting purposes
 - (j) To fulfil and monitor our responsibilities under equalities, immigration and public safety legislation
 - (k) To enable us to contact your next of kin in the event of an emergency (we will assume you have checked with the individuals before you supply their contact details to us)
 - (l) To promote and communicate careers and alumni events and newsletters with you
- 6.4.2 We consider the processing of your personal information for these purposes to be either necessary for the performance of our contractual obligations with you (e.g. to manage your student experience and welfare while studying at TSE), or necessary for compliance with a legal obligation (e.g. equal opportunities monitoring), or necessary for the performance of tasks we carry out in the public interest (e.g. teaching), or necessary for the pursuit of the legitimate interests of TSE or relevant external organisations.

6.5 Who will my personal information be shared with?

- 6.5.1 As described above, your personal information is shared with relevant staff at TSE as required. In addition, it is shared as permitted or required by law, on a considered and confidential basis, with a range of external organisations, including the following:
- (a) Your funders and/or sponsors as relevant (e.g., the Student Loans Company)
 - (b) Arts University Bournemouth (AUB), our validating partner and awarding body
 - (c) External examiners and assessors, and external individuals involved in relevant AUB or TSE committees or procedures
 - (d) Relevant Government Departments (e.g. Department for Education, Home Office, Foreign and Commonwealth Office, Department of Health)
 - (e) Relevant executive agencies or non-departmental public bodies (e.g. UK Visas and Immigration, HM Revenue and Customs, the Health and Safety Executive)

- (f) Relevant Higher Education bodies (e.g. Office for Students, UK Research and Innovation, Universities and Colleges Admissions Service, Office of the Independent Adjudicator, the organisation(s) running the National Student Survey and other student and leaver surveys)
 - (g) Local authorities
 - (h) On occasion and where necessary, the police and other law enforcement agencies
 - (i) On occasion and where necessary, auditors
 - (j) Companies or organisations providing specific services to, or on behalf of, TSE
- 6.5.2 Other than as set out above, we will not normally publish or disclose any personal information about you to other external individuals and/or organisations unless you have requested it or consented to it, or unless it is in your vital interests to do so (e.g. in an emergency situation).

7 How We Use Your Personal Information (Non-HE Students)

- 7.1 TSE will use the details you provided for registration and course administrative purposes. We may aggregate or anonymize such data (where necessary) for statistical and course improvement purposes upon the completion of the course.

7.2 What is the purpose and legal basis of the processing?

- 7.2.1 TSE will process your personal information for a range of contractual, statutory or public interest purposes, including the following:
- (a) To deliver and administer your education, and record the details of your studies
 - (b) To determine/confirm your professional achievements (e.g. certificate)
 - (c) To administer the financial aspects of your relationship with us
 - (d) To deliver facilities to you (e.g. use of studio or equipment)
 - (e) To enable your participation at events/functions
 - (f) To communicate effectively with you on matters related to your course
 - (g) To operate security (including CCTV), governance, disciplinarys, complaints, audit and quality assurance processes and arrangements
 - (h) To compile statistics and conduct research for internal reporting purposes
 - (i) To fulfil and monitor our responsibilities under equalities, immigration and public safety legislation
 - (j) To enable us to contact your next of kin in the event of an emergency (we will assume you have checked with the individuals before you supply their contact details to us)

7.3 Who will my personal information be shared with?

- 7.3.1 As described above, your personal information is shared with relevant staff at TSE as required. In addition, it is shared as permitted or required by law, on a considered and confidential basis, with a range of external organisations, including the following:
- (a) Your funders and/or sponsors
 - (b) Relevant executive agencies or non-departmental public bodies (e.g. UK Visas and Immigration, HM Revenue and Customs, the Health and Safety Executive)
 - (c) Local authorities
 - (d) On occasion and where necessary, the police and other law enforcement agencies
 - (e) On occasion and where necessary, auditors

- (f) Companies or organisations providing specific services to, or on behalf of, TSE
- 7.3.2 Other than as set out above, we will not normally publish or disclose any personal information about you to other external individuals and/or organisations unless you have requested it or consented to it, or unless it is in your vital interests to do so (e.g. in an emergency situation).

8 How We Use Your Personal Information (Job Applicants)

- 8.1 TSE will use the details you provide on your application including CV and covering letter and any supporting documents requested following any interview process.
- 8.2 You may also be required to undergo certain additional recruitment checks or procedures as part of the job application and offer process (e.g. criminal convictions checks or visa application procedures).

8.3 What is the purpose and legal basis of the processing?

- 8.3.1 TSE will process the personal information provided on your application and the other information referred to above for the purposes of:
 - (a) identifying you
 - (b) processing your application
 - (c) verifying the information provided and assessing your suitability for the role (including any relevant right to work checks)
 - (d) deciding whether to offer you a job, and communicating that outcome (together with any feedback)
- 8.3.2 We may also use or disclose the information provided for the following statutory or public interest purposes:
 - (a) To prevent or detect fraud
 - (b) For equal opportunities monitoring
 - (c) To help us to make reasonable adjustments for any disability, as requested by you
- 8.3.3 We consider the processing of your personal information for the above purposes to be either necessary for us to take steps with a view to creating a contractual relationship with you (e.g. to assess your application for employment with us), or necessary for compliance with a legal obligation (e.g. equal opportunities monitoring). We require you to provide us with the information we ask for during the application process in order to assess your application properly except where its supply is marked as optional. Application decisions are not automated.

8.4 Who will my personal information be shared with?

- 8.4.1 As well as circulating your application and related materials to the appropriate staff at TSE, we may share your personal information for the above purposes as relevant and necessary with:
 - (a) Where relevant and as required, the Disclosure and Barring Service or UK Visas and Immigration in order to administer relevant recruitment checks and procedures
 - (b) Your referees
 - (c) Companies or organisations providing specific recruitment services to, or on behalf of TSE
- 8.4.2 In all cases, we will only use any information gathered as part of any relevant check or procedure for that specific purpose, and we will handle, store, retain and destroy relevant materials in accordance with applicable legislation and codes of practice.

9 How We Use Your Personal Information (Site Visitors)

- 9.1 Please refer to our 'Cookies Policy' in the following section and the 'Site Visitor Agreement' on our website.

10 Cookies Policy

- 10.1 A "cookie" is a small amount of data sent from the server and stored on your computer's hard drive. We use 'cookies' while you access the Sites to avoid the need to re-enter details on different occasions. Occasionally, we use session recording or click tracking software (e.g. Google Analytics) to understand how you interact with our websites, for example by scrolling the page, or clicking your mouse on a particular link.
- 10.2 The information is used for analysing site activities and generating insights to allow us to improve your online experience. Examples include:
- (a) enabling our service to recognise your device so that you don't have to give the same information several times during one task
 - (b) recognising that you may already have given a username and password so that you don't need to do it for every web page requested
 - (c) measuring how many people are using services, to make the services easier to use and to ensure sufficient capacity for quick delivery to your web browser
 - (d) adding new features or removing elements that make the website difficult to use
 - (e) informing the choice of words and images that appear on the site to improve responses to our campaigns
 - (f) informing future changes to website design and functionality
- 10.3 Depending on the type of device you're using and settings, it may supply us with additional information about the device type, your operating system, and details associated with this. Only your interaction with our website is captured and we receive no information about other sites you may view.
- 10.4 Most web browsers are automatically set up to accept cookies, but you can set your browser to refuse cookies or ask your browser to show you where a cookie has been set up. Please note that certain features of the Sites are only activated by the presence of a cookie and if you choose to refuse cookies these features may not be available to you. All modern browsers allow you to change your cookie settings. These settings will typically be found in the 'options' or 'preferences' menu of your browser. In order to understand these settings, the following may be helpful (otherwise you should use the 'Help' option in your browser for more details):
- (a) Cookie settings in Microsoft Edge
 - (b) Cookie settings in Firefox
 - (c) Cookie settings in Chrome
 - (d) Cookie settings in Safari
- 10.5 Please note that we do not recommend turning cookies off when visiting <https://www.thinkspace.ac.uk> as this will prevent you from using many of the services on the Sites. For further information about cookies and how to control their use, please visit the following third party educational resources: <https://www.allaboutcookies.org> and <https://www.youronlinechoices.eu>.

11 Age Requirements and Children's Privacy

- 11.1 TSE's postgraduate programmes have a minimum age of 21 at the course start date, and TSE does not knowingly collect personal information from children in connection with its courses.
- 11.2 For the protection of children's privacy on our website and free offerings, we require parental consent from users under the age of 16. If we become aware that a child under 16 has provided us with personal information, we will delete it unless parental consent is provided.

- 11.3 In certain circumstances, staff members at TSE may have a duty to disclose sensitive information about adults at risk to designated colleagues or appropriate government agencies under the terms of our Safeguarding Policy or the Prevent Duty.

12 International Transfer

- 12.1 TSE uses external providers to process, store and back-up our data. We also use cloud data storage. By default, data is stored at data centres located in the UK or the EU but in exceptional circumstances data may be processed at data centres outside the UK/EU. Your personal information will only be transferred to countries that the UK Government has assessed as providing an adequate level of data protection, or where adequate safeguards (such as the UK extension to the EU-US Data Privacy Framework) are in place to protect your personal information.

13 How Long Will My Information Be Kept?

- 13.1 We will only keep your personal information for as long as is necessary for the purposes set out in this Notice and to meet our legal and regulatory obligations. In general, student records are retained for six years following the end of your relationship with TSE. Certain records are kept for longer where required — for example, safeguarding records are retained for a minimum of seven years. When information is no longer required, it is securely destroyed.

14 How Can I Access My Information?

- 14.1 You have the right, subject to certain exemptions, to access a copy of your personal information that is held by TSE by submitting a request (commonly known as a 'subject access request').
- 14.2 If you wish to make a subject access request, please email contact@thinkspace.ac.uk to request a form.
- 14.3 On receipt of your completed form, payment of fee (if applicable), verification of your identity, and sufficient details to enable us to locate the information, TSE is obliged to respond within one calendar month. In circumstances where the request is excessive, we may extend the deadline for up to two months to provide a full response. If so, we will notify you of this extension and the reason it has been applied.
- 14.4 The information will be supplied subject to any applicable exemptions. The data will be provided as of the date of receipt of your request.

15 How To Change The Way We Contact You

- 15.1 You have the right to stop receiving marketing communications from us if you wish, you can do so at any time by one of the following methods:
- (a) Click 'unsubscribe' in any of the previous emails we sent you
- 15.2 Please be aware that stopping marketing communications will not stop student service communications (such as student updates/notifications), which are essential communications if you are studying at TSE.