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GBS Privacy Policy

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Document title	GBS Privacy Policy
Version	V2.3
Approved by	

GBS Privacy Policy

2. Information that we collect.

2.1. G

2.2.9. **Special Categories of Personal Data** includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, criminal convictions and offences, information about your health and genetic and biometric data.

2.2.10. We also collect, use, and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may

4. Purposes for which we will use your personal data.

4.1. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

4.2. Note that we may process your personal data for more than one lawful ground

	(d) Marketing and Communications	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services).
To enable you to partake in a prize draw, competition or complete a survey.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you. (b) Necessary for our legitimate interests (to study what courses students apply for, to develop them and grow our business). (c) consent (where results of a survey are analysed outside the UK/EEA).
To manage, administer and protect our business (including legal and accounting support, investments, and leverage) and our websites (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, 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 website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Usage
- (e) Marketing and Communications

marketing, customer relationships and experiences.		updated and relevant, to develop our business and to inform our marketing strategy).
To make suggestions and recommendations to you about goods or services that may be of interest to you, including goods and services of our partners.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our services and grow our business).

- 4.3. Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to analysing results of surveys which are processed outside the UK/EEA.
- 4.4. **Marketing.** We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.
- 4.5. **Third-Party Marketing.** We do not share your personal data with any company outside our group for marketing purposes.
- 4.6. **Opting out.** You can ask us to stop sending you marketing messages at any time by contacting our DPO on dpa@globalbanking.ac.uk. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

example, to provide services). In this case, we may have to cancel a service you have with us, but we will notify you if this is the case at the time.

- 6.3. Please, note that some of our surveys are currently processed outside the UK and the European Economic Area (EEA). We will secure your express opt-in consent where necessary before you take any of those surveys.
- 6.4. Please, contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK/EEA.

7. Data Security

- 7.1. We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also only allow access to your personal data to employees and contractors that have a business requirement to process your personal data. They will only process your personal data on our instruction, and they must keep it confidential.
- 7.2. We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach.

8. Data Retention

- 8.1. We will retain your information for as long as necessary to provide you with the services that you have requested from us or for as long as the law otherwise permits.
- 8.2. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 8.3. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax and legal purposes. Academic regulations require us to keep
- 8.4. In some circumstances you can ask us to delete your data: see *Your right to the information we hold about you* below for further information.
- 8.5. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your rights to the information we hold about you.

- 9.1. Under data protection laws you have rights in relation to your personal data that include the right to access, correction, erasure, and transfer of your data, as well as the right to impose a restriction on or object to the processing of your data. Finally, you have the right to data portability and the right to withdraw consent to data processing. Please, use the Glossary at the end of this document to help you understand the scope of your rights. If you wish to exercise any of the rights set out above, please contact our Data Protection Officer on: dpo@globalbanking.ac.uk
- 9.2. You have the right to see the personal data that we keep about you, by making a request in writing to us at dpo@globalbanking.ac.uk. You will not have to pay a fee to access your personal data (or to exercise any of other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive or refuse to comply with your request in these circumstances. We aim to

respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made many requests. In this case, we will notify you.

- 9.3. If you are not happy with any aspect of how we collect and use your data, you have supervisory authority for data protection issues (www.ico.org.uk). We would be grateful if you would contact us first if you do have a complaint, so that we can

a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the ICO. In the first instance, complaints should be directed to GBS Data Protection Officer at dpa@globalbanking.ac.uk.

- 16.2. If you remain concerned that your information has not been handled as described, you may raise your complaint with the ICO.
- 16.3. By submitting a complaint, you are agreeing that GBS can process, use, and share information it contains to enable the complaint to be considered. Information may be disclosed to any person who has a need to see it for the complaint to be fully investigated. Information may also be shared with relevant people after a complaint to facilitate actions and recommendations after investigation.
- 16.4. All documentation relating to complaints will be kept confidential and shall be disclosed only to those who have a need to see it for the complaint to be fully investigated. Information may also be shared with relevant people after a complaint to facilitate actions and recommendations after investigation.

further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

19.1.2. **Performance of Contract** means processing your data where it is necessary for

scientific or historical research purposes or statistical purposes, or for establishment, exercise or defence of legal right.

19.1.7. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

19.1.8. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

19.1.9. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

19.1.10. **Right to Data Portability.** The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services. It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability.

19.1.11. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.