

INFORMATION SECURITY / DATA PROTECTION RELATED: EXTERNAL PRIVACY NOTICE

This policy is annually reviewed to ensure compliance with current regulations

Approved/reviewed by	
Approved by: Data Protection Officer Reviewed by: Director of ICT / Head of Marketing & Admissions	
Date of next review	Sept 2026

This policy and procedure is subject to The Equality Act 2010 which recognises the following Protected Characteristics: Age, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion and Belief, Sex, Sexual orientation and Disability

Document Control

1.1. Document Details

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Version	Date	Author	Comments
1.0	October 2025	Evalian Limited	Definitive Release

1.3. Distribution

Name	Email	Organisation
Everyone	Website	General Public

Boston College

External Privacy Notice

Last Updated: February 2025

1. Who we are and what we do

Who we are

We are Boston College (“the College”, “us”, “we”, “our”). We are a further education college registered in England and Wales under registration number 02817068 and we have our registered office at Skirbeck Road, Boston, Lincolnshire, PE21 6JF. We are registered with the UK supervisory authority, Information Commissioner’s Office (“ICO”, in relation to our processing of Personal Data under registration number Z4930852.

What we do

We are in the business of offering a wide range of academic programs and co-curricular opportunities designed to promote leadership development, self-exploration, social interaction, and student formation. We are committed to protecting the privacy and security of the Personal Data we process about you.

Controller

Unless we notify you otherwise, we are the controller of the Personal Data we process about you. This means that we decide what Personal Data to collect and how to process it.

2. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the ‘How to contact us’ section.

3. Who this privacy notice applies to

This privacy notice applies to you if:

1. You visit our website
2. You submit an application for one of our courses
3. You enquire about our services
4. You sign up to receive newsletters and/or other promotional communications from us
5. You provide us your products and/or services

4. What Personal Data is

'Personal Data' means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

'Special Category Personal Data' is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone's sex life or sexual orientation.

5. Personal Data we collect

The type of Personal Data we collect about you will depend on our relationship with you. For the type of Personal Data we collect see the table below in the section entitled 'Purposes, lawful bases and retention periods'.

6. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by email and/or via our website.

However, we may also collect your Personal Data from third parties such as:

- reputable companies who provide lead generation contact lists
- others to whom you have provided consent
- publicly available sources such as social media platforms and websites

7. Purposes, lawful bases and retention periods

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:

Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
Student Applicants	Name, address, email address, Phone number, Qualifications, Education/ employment history, Nationality, Permanent residence, Emergency contact details, Parent/Guardian details, Details of programme/ course applied for, DOB, Gender, Reference Data, Criminal Convictions, Health/ Disability information	To manage our student admissions and recruitment services Criminal convictions- Safeguarding of children and individuals at risk Health Data - Support for individuals with a particular disability or medical condition	Consent, Legitimate Interests Special category data - Substantial public interest	3 years
Suppliers/ Partners / Agent	Name, Contact Details, Job Title	Transactional for fulfilling the contract with us	Legitimate interests	2 years following last engagement
Website Enquirer; Business Associate	Name, job title, email address, phone number, company you work for	To responds to your query; To send you newsletters and other promotional material	Consent, Legitimate interests	2 years following last meaningful contact or after opt out
Website user	IP address, unique device identifier, browser characteristics, device characteristics, operating system, language preferences, referring URLs, and dates and times of activity	User Analytics ; To operate, evaluate and improve our business ; To deliver content tailored to the user	Consent	14 months



Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

8. Sharing your Personal Data

For the purposes referred to in this privacy notice we may share your personal data across the College on a need-to-know basis to make decisions on your application (e.g., admissions team, admissions tutors, marketing, SEND and Safeguarding Teams and faculties). We may also share your information to offer support and additional services if you choose to come and study with us.

Where we are sharing your information with other organisations, we will ensure that they comply with the Data protection legislation. Your data will be stored by our Customer Relationship Management (CRM) and Student Record systems.

We may also share your application data with relevant parties for the following reasons:

- To verify your references and qualifications.
- With your consent, to discuss your application with third parties, including parents or guardians.
- If submitted via an accredited recruitment agent.
- For reporting purposes to UCAS if you applied directly to the University.
- As required by law or authorized under Data Protection legislation with official agencies or regulatory bodies.
- With partners involved in the admissions process or program development.
- To inform you about University events.
- To assess your suitability for your chosen program with external bodies.
- For programs offered in conjunction with third parties, such as employers for Apprenticeship programs.

9. International Transfers

Your Personal Data may be processed outside of the UK. This is because the organisations we use to provide our service to you are based outside the UK.

We have taken appropriate steps to ensure that the Personal Data processed outside the UK has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that:

- Your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation), or

- We enter into an International Data Transfer Agreement (“IDTA”) with the receiving organisation and adopt supplementary measures, where necessary. (A copy of the IDTA can be found here [international-data-transfer-agreement.pdf \(ico.org.uk\)](#)).

10. Marketing Communications

From time to time, with your consent, we may use your information to contact you with details about our products and services which we feel may be of interest to you. You have the right at any time to stop us from contacting you for marketing purposes. If you wish to exercise these rights you can do so by following the ‘unsubscribe’ link on any emails received or contacting us at marketing@boston.ac.uk.

11. Your rights and how to complain

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a “Subject Access Request”)
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification**
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)
You have the right to ask us to delete your Personal Data.
- **Right to object to processing**
You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing**
You have the right to restrict our use of your Personal Data.

- **Right to portability**

You have the right to ask us to transfer your Personal Data to another party.

- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.

- **Right to withdraw consent**

If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.

- **Right to lodge a complaint**

You have the right to lodge a complaint with the relevant supervisory authority, if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in the UK is the Information Commissioner's Office who can be contacted online at:

[Contact us | ICO](#)

Or by telephone on 0303 123 1113

How to exercise your rights

You will not usually need to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

12. Children's Privacy

We are committed to protecting the privacy of applicants under 18. We collect personal identification details, educational records, and parental contact information. Sensitive data, such as health and disability status, is also gathered to ensure equal opportunities.

This data is used to process applications, comply with legal requirements, and communicate with parents or guardians. We implement strict security measures to protect children's data, limiting access to authorised personnel only. Parents or guardians have the right to access, correct, or request the deletion of their child's data by contacting our Data Protection Officer.

13. How to contact us and our Data Protection Officer

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact us as follows:

Address: Boston College, Skirbeck Road, Boston, PE21 6JF

Email: DataProtection@boston.ac.uk

We have also appointed a Data protection Officer ("DPO"). Our DPO is Evalian Limited and can be contacted as follows:

DataProtection@boston.ac.uk

Please mark your communications FAO the 'Data Protection Officer'.

14. Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified: February 2025