

Joint privacy notice of ECCTIS Ltd and Office for Students: Transnational Education Project

About this privacy notice

This privacy notice relates to the collection, sharing and use of personal data for the purposes of the Transnational Education Project.

Collection and use of personal data for ECCTIS Ltd's and Office for Students' (OfS's) core functions are covered by their respective general privacy notices which can be found on their websites:

ECCTIS Ltd	Privacy notice (ecctis.com)
Office for Students	www.officeforstudents.org.uk/ofs-privacy/

The General Data Protection Regulation (GDPR) requires that clear and transparent information is provided to individuals about the use(s) that will be made of their personal information: "The principle of transparency requires that any information and communication relating to the processing of those personal data be easily accessible and easy to understand, and that clear and plain language be used." (GDPR Recital 39)

The Transnational Education Project involves processing personal data that is not covered in the parties' general privacy notices.

Short form privacy notice

Here is a short summary of how your personal data will be held and used:

- Your personal data will be collected and/or compiled by ECCTIS Ltd and shared with the OfS for the purposes of providing a list of appropriate stakeholders in the field of transnational education.
- The OfS will use this personal data to ensure that it can communicate with its stakeholders effectively, and will do this by maintaining a database of contact information for stakeholders.
- The OfS obtains your personal information directly from ECCTIS Ltd. In addition to this there will be circumstances where the OfS needs to obtain your contact information from another source, so that it can contact you to meet its public task. The OfS is working with ECCTIS Ltd to facilitate initial engagement with you and other stakeholders in the international higher education sector.
- The Office for Students and ECCTIS Ltd will be joint controllers of your personal information held in respective systems. ECCTIS Ltd holds personal information about stakeholders for its own purposes. Information about how it uses this information, as well as

its location and contact details for ECCTIS Ltd can be found in its privacy notice, available at: <https://www.ecctis.com/PrivacyNotice.aspx>.

- The legal bases of ECCTIS Ltd and the OfS that will be used for processing your information are as follows:

ECCTIS Ltd	Article 6(1)(a) – consent. ECCTIS Ltd will get your consent to share your personal data with the OfS.
Office for Students	Article 6(1)(e) – public task. The legal basis for processing your personal data is that it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

- Your personal data will be stored on secure servers within the UK and will not be transferred outside the territory unless required by a court order.
- It will not be routinely shared with any other organisations.
- We will no longer hold your personal data if we become aware that your job role or the organisation you work for has changed and that we therefore no longer need to communicate with you. At that point your personal data will be confidentially and securely disposed of.
- You have certain rights in relation to your personal information, which are set out at: <https://ico.org.uk/your-data-matters/>
- You may contact the Data Protection Officer of either organisation with any queries or concerns you have about the use of your personal information.

Full privacy notice for Transnational Education Project

1. About the Office for Students

The Office for Students ('OfS') is the regulator of the higher education sector in England and has certain statutory functions set out in the Higher Education and Research Act (HERA) 2017. You can find more information about the OfS and the work that we do on our website: www.officeforstudents.org.uk

As an independent regulator, the OfS needs to communicate regularly with its stakeholders in the higher education sector, government departments and other sector bodies. The stakeholders include chief executive officers of sector bodies that we work with and officers in government departments.

As part of the Transnational Education Project, the OfS is seeking to build relationships with officers and representatives from overseas regulatory agencies and international quality assurance networks. These relationships will be used to communicate the OfS's role in regulating transnational education for English providers and to build networks that will support the OfS's regulation.

2. Protecting your data

Both the OfS and ECCTIS Ltd are committed to protecting your personal information and being clear about what information we hold about you and how we use it. This privacy notice tells you what to expect when the organisations collect and share personal information as part of the Transnational Education Project.

Both organisations are registered with the Information Commissioner's Office (ICO). Our registration numbers are as follows:

Office for Students	ZA309955
ECCTIS Ltd	Z7566127

You can check the entry details on the ICO's website: <https://ico.org.uk/about-the-ico/what-we-do/register-of-fee-payers/>.

3. Data controllers and Data Protection Officers

The OfS and ECCTIS Ltd are 'joint controllers' of any personal information collected within scope of this privacy notice.

The details of the data controllers are as follows:

Name	ECCTIS Ltd	Office for Students (OfS)
Address	68-70 Suffolk Road Cheltenham GL50 2ED	Nicholson House Lime Kiln Close Bristol BS34 8SR
Telephone number	0871 226 2850	0117 931 7317
Email	dpo@ecctis.com	dp@officeforstudents.org.uk You should note that this email address is monitored by other members of the OfS's data protection team. Therefore, please mark any correspondence 'for the attention of the Data Protection Officer'.

The parties' Data Protection Officers (DPOs) are the first point of contact for people whose information is processed. You can contact the DPOs using the details above.

4. Our purposes for using the information

ECCTIS Ltd and the OfS can only use your personal information where we have a specific purpose or purposes for doing so. As an independent regulator, the OfS needs to communicate regularly with its stakeholders in the higher education sector, government departments and other sector

bodies. These stakeholders include chief executive officers of sector bodies that we work with and officers in government departments.

In order to ensure that we communicate with our stakeholders effectively, the OfS maintains a database of contact information for stakeholders. The OfS obtains this information directly from stakeholders and their interactions with them.

There will also be circumstances where the OfS needs to obtain your contact information from another source, so that we can contact you to meet our public task. In these circumstances, the OfS is working with ECCTIS Ltd to facilitate initial engagement with stakeholders in the international higher education sector.

To achieve the above aims, the specific uses that will be made of your personal information are:

- Your name and email address will be collected so that the OfS may contact you to arrange further discussions or to raise a particular issue.
- Your details will be shared by ECCTIS Ltd with the OfS.
- ECCTIS Ltd will share, and the OfS will also record your job title or job role and the organisation you work for.

If we want to use your personal information for a reason other than those purposes set out above, we will tell you before we start that use and provide further information about the new purpose(s).

5. Legal basis for using your personal information

Under data protection legislation, ECCTIS Ltd and the OfS require a legal basis to be able to process your personal information for the purposes set out above.

In this case the legal bases are as follows:

ECCTIS Ltd	Article 6(1)(a) – consent. ECCTIS Ltd will get your consent to share your personal data with the OfS.
Office for Students	Article 6(1)(e) – public task. The legal basis for processing your personal data is that it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. This work relates to section 23 of the Higher Education and Research Act 2017 (HERA), which relates to assessing the quality of, and the standards applied to, higher education.

6. Information we obtain from other source(s)

Personal information may be, or have been, collected by ECCTIS Ltd from you directly or from other publicly available information.

The OfS may collect personal information from you directly, or be provided it by ECCTIS Ltd.

7. Who we share your personal data with and why

Neither party will routinely pass your information to any other organisation except where required to do so as part of our functions (for example, data processors who provide our IT infrastructure) or by law.

8. How long we hold your personal information for

ECCTIS Ltd and the OfS are only able to retain a copy of your personal information as long as it is still needed for the purpose(s) for which it was collected.

The parties will only hold your personal information for as long as they need it and no longer; for example, they will no longer hold your personal information if they become aware that your job role or the organisation you work for has changed and that they therefore no longer need to communicate with you. At that point, your personal information will be confidentially and securely disposed of.

9. Where your personal data will be stored

Your personal information will be stored securely within the UK and will not be transferred outside that territory unless required by a court order.

10. How the OfS will protect your personal information

The OfS has a number of security measures in place to protect your personal information, including:

- Accredited to the Cyber Essentials PLUS standard for cybersecurity
- All staff are required to undertake training in data protection and information security on joining the OfS
- Formal information security policies that must be read and understood by all OfS staff
- Personal information is only available to those members of staff who require access as part of their role.

You can read more information on the OfS approach to information security on its website: www.officeforstudents.org.uk/ofs-privacy/information-security/. Information about how ECCTIS Ltd protects the personal information it holds can be found in its privacy notice: <https://www.ecctis.com/PrivacyNotice.aspx>

11. Your rights in regard to your personal information

Once your personal information has been collected, you have certain rights in relation to that personal information that may be exercised. You have the right to request:

- A copy of your personal information
- Inaccurate personal information held about you is corrected
- Your personal information be deleted

- Processing of your personal information is restricted
- A copy of your information in a format that allows easy transfer ('data portability')
- That you are not subject to automated decision making or profiling (if these take place).

All these rights have certain limitations depending on the request and the purpose for which we are holding your personal information. Further information can be found about these rights and our processes for handling such requests at: www.officeforstudents.org.uk/privacy/individual-rights-under-the-general-data-protection-regulation/.

12. Use of cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to complete statistical reports on website activity. For further information about our cookies visit: www.officeforstudents.org.uk/cookies/ or for further general information visit: www.aboutcookies.org or www.allaboutcookies.org.

ECCTIS Ltd's cookie notice can be found at: [Cookies and Website terms of use \(ecctis.com\)](http://www.ecctis.com)

13. Complaints about the use of your personal information

If you are unhappy with the way in which your personal information has been handled by ECCTIS Ltd or the OfS, please contact us via our Data Protection Officers (details in section 2) and we will try to resolve your issue informally.

If you remain dissatisfied, you can complain to the data protection supervisory authority. In the UK, this is the Information Commissioner's Office (ICO) and they can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

Email: casework@ico.org.uk

14. Changes to this notice

We keep our privacy notices under regular review, and we will inform you of any relevant changes to this notice as appropriate.

This privacy notice was last updated on 8 March 2022.