

UAT-UK PRIVACY NOTICE

What is the purpose of this document?

UAT-UK ('we', 'us' are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the applicable data protection legislation the Data Protection Act 2018 and the General Data Protection Regulations (the "**GDPR**").

UAT-UK is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to candidates who engage with the services UAT-UK provide. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- UCAS ID
- Educational history (schools, secondary schools, Universities, and all associated course codes.
- UAT-UK test scores achieved via Pearson VUE.
- Information about your financial status and/or any means-tested benefits you or your parent/guardian is in receipt of.

When you visit the UAT-UK website, we use cookies and page-tagging techniques to collect the request made by your browser to the server hosting the website. This includes your IP address, the date and time of connection, the version of the web browser you are using, and the page you ask for. We use this information to ensure the security of our websites and we delete it after a maximum of 3 months. We may need to use and disclose it as necessary in the event of a security concern or incident. Please refer to our [cookie notice](#).

We may also collect, store, and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity
- Relevant medical information or disability information

How is your personal information collected?

We collect most of the personal information about you directly as part of your engagement with us or our partners (including Pearson VUE) who you will engage with in order to register for and sit your UAT-UK test.

How we will use information about you and the legal basis for processing your data under the GDPR

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

Where we need to perform the contract, we have entered into with you or in order to take steps at your request prior to the entry into a contract. *

Where we need to comply with a legal obligation. **

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. ***

Where you have consented to the processing. ****

Situations in which we will use your personal information

We need all the categories of information in the list above primarily to support and undertake the UAT-UK initiative. In some cases we may also use your personal information to pursue legitimate interests of our own or those of third parties[**], provided your interests and fundamental rights do not override those interests.

The situations in which we will process your personal information are listed below. We have indicated by asterisks the purpose or purposes for which we are processing or will process your personal information, as well as indicating which categories of data are involved.

- To register you for and administer your test(s). This will include verification of details provided, to communicate test results and any additional support you may require. */****
- To assess eligibility for a bursary code, access arrangements or special consideration. */****
- To contact you in relation to your test booking, or any application for a bursary, access arrangements or special consideration.*

- To ensure we meet any and all legal obligations with regards to the service. **
- Improve our service to test takers and university users of the tests. This includes, but is not limited to, undertaking research aimed at improving the tests, and conducting internal analysis on how the tests work, including looking at the reliability and potential bias of tests or individual test items. ***/**
- Investigate complaints or incidents have that occurred during testing. */***
- Maintain test security, prevent, and investigate potential misconduct and maintain the integrity of test results. **/**
- Defend against, or exercise legal claims, investigate complaints and respond to queries. */***
- Undertaking surveys / reviewing feedback for the purposes of improvements to the initiative. ***
- To ensure the information we hold about you is up to date and accurate. */***
- To ensure that content from our site is presented in the most effective manner for you and your computer or mobile device. ***
- To provide you with relevant news and special offers by email, phone, or post where you have consented to receive this information. ****
- Equal opportunities / equality monitoring. ***
- Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may be prevented from progressing with your application. However, this will be explained to you prior to any withdrawal from the initiative.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing, and using this type of personal information. We may process special categories of personal information in the following circumstances:

In limited circumstances, with your explicit consent. *

Where it is necessary in the context of employment law, or laws relating to social

security and social protection. **

Where the processing is necessary for the establishment, exercise, or defence of legal claims, or for courts acting in their judicial capacity. ***

We will use your particularly sensitive personal information in the following ways:

- We will use information about your physical or mental health, or disability status, to ensure your health and safety and provide appropriate adjustments and / or considerations. */**
- We will use information about your race, national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting and ensure that our tests do not significantly advantage or disadvantage certain sub-groups. */**
- Where such processing is necessary for the establishment, exercise, or defence of legal claims (including sharing with the insurers and legal advisers) or the prevention or detection of crime (for example, detecting criminal actions through the use of CCTV or reporting allegations to the police). ***

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Automated decision-making

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

Data sharing

We may have to share your data with third parties, including third-party service providers and other legal entities.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK and EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer the relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers / third party organisations process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents), the following activities are examples of activities carried out by third-party service providers:

- Pearson VUE develop and deliver the computer-based tests on behalf of UAT-UK. Candidates will sit our tests via Pearson VUE test centres worldwide. Alternatively, the tests may also be online proctored, where necessary. For more information regarding how Pearson VUE will process data, see **Privacy and cookies policy :: Pearson VUE**.
- UCAS
- Our agents, contractors and service providers (including providers of IT, webinar, accountancy and other financial services, and other support services) where applicable and where it is necessary for them to receive the information;
- Relevant professional bodies or institutions where membership or affiliation affects your entitlement to apply.
- Other University users who utilise UAT-UK Ltd.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business and operations of the

company. We may also need to share your personal information with a regulator or to otherwise comply with the law.

Transferring information outside the UK / EU

We may transfer the personal information we collect about you outside the UK and European Economic Area respectively in order to manage our relationship and/or contract with you. Where there is no an adequacy decision by the UK in place or separate transfer mechanism , to ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measure[s] to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection:

- UK International Data Transfer Assessment (IDTA).
- EU Standard Contract Clauses.
- Transfer Impact Assessments.
- Data Protection Clauses where third parties will act as Data Processors.

Data security

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Record Type	Retention Period
Candidate Data	
Candidate Name, Contact Information and Test Booking Information	Application cycle +1
Candidate ID and test result(s)	Application cycle +1
UAT-UK Candidate Policies	Until superseded + 3
Records of misconduct Investigations	Application cycle +6
Records of special consideration granted	Application cycle +1
Records of access arrangements granted	Until end of application cycle*
Records of bursaries granted to candidates	Until end of application cycle*
Evidence pertaining to access arrangements or special consideration	Until end of application cycle*
Evidence pertaining to an application for a bursary	Until end of application cycle*
Test Delivery	
Test incident reports	Until end of application cycle*
Candidate survey responses	Until end of application cycle*
Emails	24 months
Complaints and reports	Application cycle +6
UAT-UK Company Documentation and Records	
Budgets and budget reports	Current financial year +6

Annual Accounts and working papers	Current financial year +6
Purchase Orders and Invoices	Current financial year +6
Test Users Contracts	Permanent
Insurance Policies	Until policy is terminated +6
Risk register	Permanent
Commercial and third-party contracts	Permanent
Job descriptions	Permanent
Companies House documentation including Articles of Association	Permanent
Press Releases	Permanent
Branding Guidelines	Until superseded
Press Releases	Permanent
Branding Guidelines	Until superseded

****An application cycle lasts from May to October of the following year (18 months).***

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.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us in writing. See 'Do you have a question?'.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the College's Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Do you have a question?

If you have any questions about this privacy notice or how we handle your personal information, please contact UAT-UK using [this form](#) or by post:

F.A.O Emma Voight, Programme Manager, UAT-UK
4th Floor, Sherfield Building (West)
South Kensington Campus
London, SW7 2AZ

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Last Updated May 2024