



## UCFB\* Privacy Notice

Owner:	Director of Transformation, Technology, Facilities and Sport
Author:	Director of Transformation, Technology, Facilities and Sport
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Approved By:	Board of Directors
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Changes to the Policy:	We reserve the right to update this policy at any time, and we will notify staff, suppliers, and partners by email when we make any substantial updates.

\*UCFB is a trading name of University Campus of Football Business Limited.

## Introduction

UCFB respects your privacy and is committed to protecting your personal data. This Privacy Notice outlines the basis on which any personal data we collect from you, or that you provide to us, will be processed by us and will also tell you about your privacy rights and how the law protects you. This Privacy Notice relates to our processing of personal data of past, present and prospective students of UCFB and such other third parties who interact with us (including visitors to our website).

### 1. Who we are

UCFB Campus of Football Business Limited (Company number 07440042) is registered in England and Wales with its registered office being at Arch View House, First Way, Wembley, London, HA9 0JD and is referred to as "UCFB" in this Notice. UCFB has appointed a designated Data Privacy Team, which is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the Data Privacy Team via e-mail at: [dataprivacyteam@UCFB.com](mailto:dataprivacyteam@UCFB.com) or via post to: Data Privacy Team, UCFB, Arch View House, First Way, Wembley, London, HA9 0JD.

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 ([www.ico.org.uk](http://www.ico.org.uk)). UCFB welcomes the opportunity to resolve concerns directly in the first instance.

### Changes to the privacy notice and your duty to inform us of changes

We may change this Privacy Notice from time to time. Any changes we make to this Privacy Notice in the future will be posted on our website and, where appropriate, notified to you by email. This version was last updated on 4 June 2025. It is important that the personal data UCFB holds about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 2. The data we collect 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 to the extent that the person can no longer be identified (anonymous data). We may collect, use, store and transfer different kinds of personal data about you depending on the nature of services we are providing. We have grouped together the types of personal data as follows:

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth, gender, national insurance number (or other tax identification number), passport number and photographic identification and CCTV images.
- **Contact Data** includes email address, telephone numbers and postal address.
- **Education Data** includes information about your education history at other schools/colleges/universities as well as current connections with UCFB including student clubs and societies and your other interests.
- **Financial Data** includes bank account and payment card details.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data** includes information about how you use Our Sites (as defined below) and our services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use, and share **Aggregated Data** such as statistical or demographic data. 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

aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

Where it is necessary to act in your best interests, and for the establishment, exercise, or defence of legal claims (or as otherwise authorised by data protection laws), UCFB may need to process information in accordance with this Privacy Notice which is sensitive in nature such as details about your race or ethnicity, religious or philosophical beliefs or information about your health and also information about criminal convictions and offences. If you volunteer sensitive personal data, you will be allowing us to process it as part of instructing us in respect of our services. The services which we provide together with Our Sites are not intended for children and we do not knowingly collect any data relating to children.

### **If you fail to provide personal data**

Where UCFB needs to collect personal data by law, or in order to perform the services for you and you fail to provide that data when requested, we may not be able to provide you with the services however we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

UCFB uses different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity and Contact Data by filling in forms on our online systems and/or on our website (“Our Sites”) or by corresponding with us in person or by post, phone, email, social media or otherwise. This includes personal data you provide when you:
  - register to use Our Sites;
  - enrol with us or subscribe to our services;
  - make an enquiry about our services;
  - subscribe to our publications;
  - request marketing to be sent to you; or
  - give us some feedback on the services we provide.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](#) for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources. When we obtain information about you from third parties or publicly available sources rather than from you directly, we will notify you of any relevant information obtained, for example, the type of personal data, within a reasonable period. Some examples of third parties or publicly available sources and the type of personal data received include:
  - Identity, Contact and Education Data from your previous or current school, sixth form college or university;
  - Identity, Contact and Education Data from business partners (such as Buckinghamshire New University, University of East London, or Global Institute of Sport);
  - Identity and Contact Data from The Universities and Colleges Admissions Service (UCAS);
  - Technical Data from analytics providers such as Google in connection with the use of our website.

### **Information collected from you about other people**

When you provide personal information to UCFB, which does not relate directly to you but is personal information of a third party (for example, details of family members), you confirm that you are authorised to do so and shall ensure that this Privacy Notice is brought to the attention of such individuals so that those individuals understand how UCFB will use their data. UCFB will

hold and use such personal information in accordance with this Privacy Notice and applicable data protection laws.

### **Third-party links**

Our sites may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. UCFB does not control these third-party websites and is not responsible for their privacy statements. When you leave Our sites, we encourage you to read the Privacy Notice of every website you visit.

### **4. How we use your personal data**

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

- 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 we need to comply with a legal or regulatory obligation.

See below to find out more about the types of lawful basis that we will rely on to process your personal data. We do not use your information for automated decision making. Generally, we do not rely on consent as a legal basis for processing your personal data except in those circumstances set out in the table below relating to sending direct marketing communications via email or as otherwise set out in this Privacy Notice. You have the right to withdraw consent to marketing at any time by following the links on any marketing message sent to you or by contacting us.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we may 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. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To interact with you before you are enrolled as a student, as part of the admissions process (e.g. when you express an interest in studying at UCFB)	(a) Identity (b) Contact (c) Education	Necessary for our legitimate interests (to provide you with information in relation to the services which we carry out and provide you with the best possible service in order to run our business effectively)
To deliver to you those services which you have requested and which we have agreed to provide (e.g. the provision of our core teaching, learning and research services)	(a) Identity (b) Contact (c) Education(d) Financial	Necessary for our legitimate interests (to provide services to you and to promote equality and diversity throughout UCFB)
To manage our relationship which will include:(a) Notifying you about changes to our terms or privacy policy(b) Asking you to complete a survey following delivery of our services (c) Responding to any complaints raised in respect of services provided by us	(a) Identity (b) Contact (c) Education	(a) Necessary to comply with a legal or regulatory obligation(b) Necessary for our legitimate interests (to keep our records updated and to evaluate student feedback for the purposes of developing and growing our business)
To administer and protect our business and Our Sites (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, to maintain and improve our academic and financial management, the 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 or regulatory obligation
To use data analytics to improve Our Sites, services, marketing, student relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of students for our services, to keep Our Sites updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you by email about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications (f) Education	Your consent to the processing

UCFB has set out below further information on the meaning of each of the legal bases for processing set out in the third column of the table above:

**Legitimate Interest** means the interest of UCFB business in conducting and managing its business to enable it to provide the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how UCFB assesses its legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Consent** means processing your personal data where you have provided a freely given, specific, informed and unambiguous indication of your agreement to us processing your personal data.

**Marketing** We strive to provide you with choices regarding certain personal data uses, particularly around marketing. You will only receive marketing communications from us if we have a lawful basis for sending such marketing, details of which can be found in the table above.

**Opting out** You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

**Cookies** You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the UCFB website may become inaccessible or not function properly. For more information about the cookies used on the website, [please click here](#).

**Change of purpose** UCFB will only use your personal data for the purposes for which it was collected, unless it is reasonably considered that UCFB needs to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If UCFB needs to use your personal data for an unrelated purpose, it will notify you and it will explain the legal basis which allows it to do so. Please note that UCFB may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. Disclosures of your personal data

UCFB may have to share your personal data with selected people or organisations for the purposes set out in the table in Section 4 above. This will include, but is not limited to, sharing personal data with:

- Other companies in the UCFB Group acting as joint controllers or processors and who are based in the [European Economic Area](#) (EEA) and provide educational services.
- Awarding partners and subsidiaries, where those relationships allow us to provide approved higher education and professional educational programmes.
- Service providers who provide IT and system administration services (including back-office support), marketing platforms, and website hosting services.
- Selected third parties including UCAS, accommodation providers, financial intermediaries and student support services, in each case where there is a legitimate reason for their receiving the information.
- Government departments and agencies where we have a statutory obligation to provide information (e.g. the Office for Students (OFS), and Higher Education Statistics Agency (HESA)).
- Parents, guardians and next-of-kin (where there is a legitimate reason for disclosure).
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice. We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, or in order to enforce or apply any terms of our arrangement with you or to protect the rights, property or safety of

UCFB or any part of our Group, our students or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

UCFB may need to send your personal data outside of the EEA. Where your personal data is being transferred outside the EEA, UCFB will carry out an assessment of the level of protection required taking into account the circumstances relating to the transfer. UCFB may, in certain circumstances, need to obtain your consent to the transfer unless there is an overriding legal need to transfer the personal data.

## **7. Data security**

UCFB has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, UCFB limits access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Unfortunately, the transmission of information via the Internet is not completely secure. Although UCFB will do our best to protect your personal data, it cannot guarantee the security of your data transmitted to Our Sites; any transmission is at your own risk. Once UCFB has received your information, it will use strict procedures and security features to try to prevent unauthorised access.

Where UCFB has given you (or where you have chosen) a password which enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. UCFB asks you not to share a password with anyone. UCFB has put in place procedures to manage any suspected personal data breach and will notify you and any applicable regulator of a breach, where we are legally required to do so.

## **8. Data retention**

UCFB will only retain your personal data for as long as necessary to fulfil the purposes it was collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. 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 UCFB processes your personal data and whether UCFB can achieve those purposes through other means, and the applicable legal requirements.

*Details of retention periods for different aspects of your personal data are available via the [UCFB Records Lifecycle Management Scheme](#). In some circumstances, you can ask UCFB to delete your data: see 'Request erasure' in Section 9 (below) for further information. Furthermore, in some circumstances, UCFB may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case UCFB may use this information indefinitely without further notice to you.*

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask UCFB to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where UCFB may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that UCFB may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where UCFB is 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. In some cases, UCFB may demonstrate that it has compelling legitimate grounds to process your information which override your rights and freedoms.

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

**Request the transfer** of your personal data to you or to a third party. UCFB 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 UCFB to use or where it used the information to perform a contract with you.

**Withdraw consent at any time** where UCFB is 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, UCFB may not be able to provide certain services to you. UCFB will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

**No fee usually required** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, UCFB may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, UCFB may refuse to comply with your request in these circumstances.

**What we may need from you** UCFB may need to request specific information from you to help confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not

disclosed to any person who has no right to receive it. UCFB may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond** Upon receiving a withdrawal request, organisations are required to halt all data processing activities linked to the withdrawn consent immediately. This prompt cessation ensures compliance with data protection regulations and respects the individual's decision. Organisations must also inform all data recipients that the individual's consent has been revoked to ensure that no further processing occurs.

UCFB will endeavour to respond to all legitimate requests within one month. In certain situations, UCFB may require an extension of up to two additional months, but UCFB must inform you of the extension and the reason why within the initial month.

## 10. Related Policies and Procedures

- [UCFB Group CCTV Policy](#)
- [UCFB Data Protection Policy](#)
- [UCFB Records Management Policy](#)
- [UCFB Records Lifecycle Management Scheme](#)
- [UCFB Information Security Policy](#)