



Data Protection Policy and Privacy Notice

Updated: 23/03/25

1. Introduction

UK2Learn Guardianship Ltd (“UK2Learn”) is committed to protecting the privacy and integrity of the personal data it holds on staff, students, clients, parents, and other individuals. This policy outlines our compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

Personal data is information relating to an identifiable individual, including details such as name, contact information, academic records, financial information, and any other information that can identify a person directly or indirectly.

2. Scope

This policy applies to: - All staff, students, parents, guardians, and clients - All personal data processed, whether held electronically, on paper, or in any other format - All UK2Learn operations, including student welfare, administration, communications, and business management

3. Data Controller and Data Protection Officer

- Data Controller: UK2Learn Guardianship Ltd
- ICO Registration Number: Z1953766
- Responsible Officer / DPO: Alex Mackie, Director
 - Contact: +44 (0)7917 820033 | amackie@uk2learn.com

In Alex Mackie’s absence, queries or concerns regarding personal data can be raised with the Deputy Director.

4. Principles of Data Protection

UK2Learn will comply with the six principles of UK GDPR: 1. Personal data must be processed lawfully, fairly, and transparently. 2. Personal data will be collected for specified, explicit, and legitimate purposes. 3. Data will be adequate, relevant, and limited to what is necessary. 4. Data will be accurate and kept up to date. 5. Data will be kept no longer than necessary and securely deleted when no longer needed. 6. Personal data will be processed securely, protecting against unauthorized or unlawful processing, accidental loss, destruction, or damage.

5. Lawful Basis for Processing

UK2Learn will only process personal data where there is a lawful basis, including: - Compliance with a legal obligation (e.g., safeguarding, immigration requirements) - Performance of a contract with parents, students, or staff - Consent, where explicit permission is required (e.g., photographs, sensitive data) - Legitimate interests (e.g., maintaining alumni relationships, statistical analysis), provided these do not override individual rights

Sensitive personal data, such as health information, racial or ethnic origin, or religious beliefs, will only be processed with explicit consent unless required by law.

6. Personal Data Collected

The types of personal data UK2Learn processes include: 1. Contact details (name, address, phone, email) 2. Academic records, references, and assessment results 3. Attendance, behaviour records, and safeguarding information 4. Health, medical, or special educational needs information 5. Identification documents (passport, visa, residency) 6. Financial information (bank details, invoices, payment history) 7. Photographs and videos for educational or promotional purposes 8. Any information received from schools, previous schools, or external organisations relevant to student welfare

7. Data Retention

- Student records: retained until the student reaches 25 years of age
- Admissions information: retained for 6 years
- Financial records: retained for 7 years
- Records will be reviewed periodically and securely deleted when no longer required

8. Data Security

UK2Learn implements technical and organisational measures to safeguard personal data, including: - Password-protected systems (Microsoft 365, Google Drive, LastPass) - Secure storage of physical records - Controlled access to sensitive data - Staff training on data protection obligations

Third-party processors are only used if they comply with UK GDPR requirements and operate under a formal Data Processing Agreement (DPA).

9. Data Sharing

UK2Learn may share personal data with: - Schools and educational institutions - Parents, guardians, and representatives - Financial institutions for payments or billing - External advisers, regulatory authorities, and government bodies (e.g., UK Visas and Immigration) - Emergency services, where necessary

All sharing is conducted lawfully and securely, with strict access controls.

10. Privacy Notices

UK2Learn provides layered privacy notices: - Basic privacy information on forms and enrolment documents - Detailed privacy statements available on the UK2Learn website - Privacy notices are transparent, concise, and free of charge - Notices are updated whenever there is a change in data processing practices

11. Rights of Data Subjects

Individuals have the following rights under UK GDPR: 1. Access: Right to view the personal data UK2Learn holds ("subject access request") 2. Rectification: Correct inaccurate or incomplete data 3. Erasure: Request deletion of personal data in certain circumstances 4. Restriction of processing: Limit how personal data is used 5. Data portability: Receive personal data in a structured, machine-readable format 6. Objection: Object to processing, including for direct marketing purposes 7. Withdraw consent: Where processing is based on consent 8. Lodge a complaint: With the ICO if rights are infringed

Requests should be submitted to Alex Mackie: +44 (0)7917 820033 | amackie@uk2learn.com

12. Data Breach

- All breaches will be reported immediately to the DSL
- The DSL will assess severity and notify the ICO within 72 hours, where required
- Affected individuals will be informed if there is a high risk to their rights and freedoms

13. References, Inspections, and Regulatory Compliance

- Academic references may be provided to other educational institutions or potential employers
- Records may be inspected by regulatory or awarding bodies
- UK Visas and Immigration may request personal data for sponsor inspections or immigration status verification

This Policy Review

Handbook published date:	23/03/2025
Handbook review by date:	23/03/2026
Responsibility for handbook review:	Joo Young Choi/Alex Mackie