



## IoC Privacy statement

### Who we are

This privacy notice explains how we receive and use your personal information for the *Your Digital Pathway* programme, an initiative of Santander Universities. The University of Bath is the lead partner for the Institute of Coding (IoC) and will be responsible for receiving and processing data on all applicants and participants on the *Your Digital Pathway* programme for evaluation purposes.

The IoC is a group of industry, government, higher education and outreach partners who have come together to create more than **150** new courses that have engaged **900,000** diverse learners to date. Our partners have created a variety of courses (many of which are online) so you can keep learning wherever you are in your life or career.

### Personal information and Santander Universities UK

For the purposes of relevant data protection legislation, Santander Universities UK (a division of Santander UK plc, 2 Triton Square, Regent's Place, London, NW1 3AN, United Kingdom) is the data controller. Their Data Protection Officer (DPO) can be contacted at 201 Grafton Gate East, Milton Keynes, MK9 1AN.

We, University of Bath, are processing data on applicants and participants as a data processor.

Please see Santander Universities UK Privacy Notice for detailed information on:

- why they are collecting your personal information
- which information will be collected
- the legal basis for this data collection
- how your information will be used
- how long the information will be stored
- who will be able to see your personal information
- how you can request to access, rectify or erase your information from their records

### Personal information and University of Bath, the Institute of Coding

The University of Bath, the lead partner in the Institute of Coding (IoC), will receive, analyse and store the data outlined in this Privacy Notice and Santander Universities UK's Privacy Notice throughout your application to, and participation in, the *Your Digital Pathway* programme.

Data will be collected by Santander Universities UK, and shared with IoC Consortium partners TechUp/Durham University, and with JS Group to:

- make sure that applicants to the course are eligible
- build up a picture of who has registered to take the course

Further data will be collected by TechUp/Durham University through the Thinkific education platform, and through pre and post course surveys, and all data will then be shared with IoC Consortium lead partner the University of Bath to:

- analyse the data provided by applicants to build up a picture of who has registered to take the course
- review the status of each learner towards completion of their training
- review the pre and post course survey data to assess how successful the programme has been

Your personal, individualised data will not be available to any other partner within the IoC consortium. Aggregated, anonymised and summarised data may be shared with IoC consortium partners to support the development of best practice.

- We will store your personal data in line with our General Data Protection Regulations (GDPR) policies: [Data Protection at the University \(bath.ac.uk\)](https://www.bath.ac.uk/data-protection/)
- Data will be transferred to the University of Bath by secure transfer
- If you decide you do not want your personal data used on an ongoing basis for research, you can notify us and request to be withdrawn. No further data will be collected or linked beyond that point. This request must be made to us, TechUp/Durham University as the training provider and to Santander Universities UK.

### **Why we collect your personal information**

We are collecting data on 'Your Digital Pathway' applicants and participants for the purposes of managing your participation in the programme and to help us understand how well the courses are working and if they are achieving their outcomes.

### **The nature of your personal data we will be using**

As part of the data collection Santander Universities UK are asking for your:

- Country of residence
- Full name
- Email address
- Phone number
- Nationality
- Name of university (if applicable)
- Date of birth
- Education/qualifications
- Current occupation and employment status
- Where you heard about the course

The special category data we will be processing includes:

- Gender

Applicants will be advised when the information requested is optional and will be asked to provide consent to sharing certain personal information with partner universities and partner businesses.

### **Our legal basis for collecting your personal information**

We collect personal information only where we need to and the law permits. In order for our use of your personal data to be lawful, we need to meet conditions in the data protection legislation. For the purpose of this programme, the relevant condition(s) that we are meeting are:

1. Article 6 (1)(f): It is necessary to collect data from users as the processing is necessary for the organisation's legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's individual data that overrides those legitimate interests.

And for the processing of special category data:

2. Article 9(2)(g) of the GDPR, and Schedule 1, Part 2 paragraph 8 of the Data Protection Act 2018: to ensure equality of opportunity or treatment.

We may request your participation in interviews and surveys as part of the evaluation of the programme but this will be optional and you may opt out at any time.

### **How we use your personal information**

Personal information collected from participants is treated as confidential and collected for management and research purposes only. Any information shared publicly will be anonymised so you cannot be identified.

We, Santander Universities UK and TechUp/Durham University will use the data to help improve education services.

### **How long we will keep your personal data**

We will keep your personal data for a maximum of 3 years, after which point they will be securely destroyed.

### **Who we will make your personal data available to**

We will not share your personal data with any other party.

### **Request to access, rectify or erase your information**

Under the Data Protection Act 2018, you are entitled to ask if we hold information relating to you and ask for a copy, by making a 'subject access request'.

Your data protection rights:

- The right to access: you are entitled to ask if we hold information relating to you and ask for a copy by making a "subject access request."
- The right to rectification: you have the right to request to correct any information you believe is inaccurate.
- The right to erasure: you have the right to request for your information to be erased, under certain circumstances.

- The right to restrict processing: you have the right to request that the processing of your personal data is restricted, under certain circumstances.
- The right to object to processing: you have the right to object to processing of your personal data, under certain circumstances.
- The right to data portability: you have the right to move your personal data to another data controller

For further information and how to request your data, please contact the University of Bath Data Protection Officer:

David Jolly  
Office of Policy & Planning  
University of Bath  
Claverton Down  
Bath  
BA2 7AY  
[dataprotection-queries@lists.bath.ac.uk](mailto:dataprotection-queries@lists.bath.ac.uk)