



**Global Banking School**

**+44 (0) 207 539 3548**

[info@globalbanking.ac.uk](mailto:info@globalbanking.ac.uk)

[www.globalbanking.ac.uk](http://www.globalbanking.ac.uk)

**891 Greenford Road, London**

**UB6 0HE**

## **GBS Privacy Policy**

**©2024 Global Banking School**



HDORG:GBA BANKING-SC

<b>Document title</b>	GBS Privacy Policy
<b>Version</b>	V2.4
<b>Approved by</b> (Oversight Committee)	Board of Directors
<b>Policy lead</b> (Staff member accountable)	General Counsel
<b>Date of original approval</b>	May 2018
<b>Date of last review</b>	December 2024
<b>Changes made at the last review:</b>	Minor editorial changes (December 2024)
<b>Date effective from</b>	December 2024
<b>Date of next review</b>	January 2027

#### Related policies

- GBS Data Protection Policy
- GBS Data Subject Access Request Policy
- GBS Access Control Policy
- GBS ICT Policy
- GBS Email Usage Policy
- GBS CCTV Policy and Procedure

#### External Reference

- <https://ico.org.uk/>
- UK Public General Acts, *Data Protection Act 2018*, Accessed online at: <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
- [The Data Protection, Privacy and Electronic Communications \(Amendments etc\) \(EU Exit\) Regulations 2019](#)



## Table of Contents

1. Introduction .....	4
2. Information that we collect. ....	5
3. How we use your personal data .....	7
4. Purposes for which we will use your personal data. ....	8
5. Disclosure of your Personal Data .....	11
6. International Transfers.....	11
7. Data Security .....	12

## **1. Introduction**

- 1.1. Global Banking School (GBS) needs to collect, store and process personal data about its staff, students, and other individuals it has dealings with, to carry out our functions and activities. GBS is a controller for most of the personal data it processes and is committed to full compliance with the applicable data protection legislation including The Data Protection Act 2018, as amended, and the United Kingdom General Data Protection Regulation (UK GDPR) 2020. This policy sets out how GBS ("we", "our", "us") handle the personal data of our staff, students, suppliers, partners, and other third parties.
  
- 1.2. GBS gathers and processes your personal information in accordance with this privacy policy. This policy provides you with information regarding your rights and our obligations, and explains how, why, and when we process your personal data and how we are keeping it safe. Please use the Glossary at the end of this document to understand the meaning of some of the terms used in this privacy policy.
  
- 1.3. GBS is responsible for your personal data, and we have appointed a Data Protection Officer (DPO) who oversees privacy related matters. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact



## 2. Information that we collect.

2.1. GBS processes personal information to meet our legal, regulatory, statutory, and contractual obligations and to provide you with information, either about our products and services or about matters of public interest. We will never collect any unnecessary personal data from you and will not process your information in any way other than as specified in this policy without telling you first. We do not knowingly collect data relating to children and our websites are not intended for children.

2.2. 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). We may collect, use, store or transfer different kinds of personal data about you which we have grouped together as follows:

2.2.1. **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

2.2.2. **Contact Data** includes billing address, delivery address, email address and telephone numbers.

2.2.3. **Financial Data** includes bank account and payment card details.

2.2.4. **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.

2.2.5. **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 websites.

2.2.6. **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey (ng)-183(our inte)-3(res)-3(ts)-2(, p



2.2.9. **Special Categories of Personal Data** includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, criminal convictions and offences, information about your health and genetic and biometric data.

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



- To register for an event such as an open day
- To make an enquiry

2.5. If you use one of our website forms or if you contact us by email, we may collect and process personal information about you. This may include:

- Your contact details including your address and phone number.
- Your name, title, date of birth and gender
- Your email addresses.
- Education or professional details
- Attendance at GBS events

2.6. We may automatically collect certain data from you as you use our website, by using



#### 4. Purposes for which we will use your personal data.

- 4.1. We have set out below, in a table format, a description of all the ways we plan to 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.
- 4.2. 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 on the email provided above, 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 register you on our systems when you are applying for one of our courses or enter contractual relationship with us.	(a) Identity (b) Contact	Performance of a contract with you.

To process your order, comply with our contractual obligations towards you and



	(d) Marketing and Communications	(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services).
To enable you to partake in a prize draw, competition or complete a survey.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you.  (b) Necessary for our legitimate interests (to study what courses students apply for, to develop them and grow our business).  (c) consent (where results of a survey are analysed outside the UK/EEA).
To manage, administer and protect our business (including legal and accounting support, investments, and leverage) and our websites (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, 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 obligation.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our services, including enhancing existing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our

<p>services and developing new features, marketing, customer relationships and experiences.</p>		<p>services, to keep our websites updated and relevant, to develop our business and to inform our marketing strategy).</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you, including goods and services of our partners.</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests (to develop our services and grow our business).</p>

- 4.3. Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to analysing results of surveys which are processed outside the UK/EEA.
- 4.4. **Marketing.** We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.
- 4.5. **Third-Party Marketing.** We do not share your personal data with any company outside our group for marketing purposes.
- 4.6. **Opting out.** You can ask us to stop sending you marketing messages at any time by contacting our DPO on [dpa@globalbanking.ac.uk](mailto:dpa@globalbanking.ac.uk). Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.



## 5. Disclosure of your Personal Data

5.1. We may have to share your personal data with the parties set out below:

5.2. **External third parties**, such as:

- Service providers who provide IT and system administration services, marketing, and delivery services.
- Professional advisers including lawyers, bankers, auditors, and insurers.
- Partner institutions.
- Government bodies that require us to report processing activities.
- Regulators.
- We may also share your personal data with third parties if we are under a duty to disclose or share your personal data to comply with any legal obligation, to enforce or apply our site terms of use or to protect the rights, property or safety of our site, our users, and others.
- Third parties to whom we may choose to sell, transfer, or merge parts of our





HOORGLOBAL BANKING SC

## 8. Data Retention

8.1. We will retain your information for as long as necessary to provide you with the

all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made many requests. In this case, we will notify you.

- 9.3. If you are not happy with any aspect of how we collect and use your data, you have supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would be grateful if you would contact us first if you do have a complaint, so that we can resolve it for you informally.

## **10. Student Responsibilities**

- 10.1. Throughout the course of your studies, you have a responsibility to keep your personal details up to date. You can update your details by sending the email to your Student Success Tutors or the admissions team.

- 10.2.



- This data is collected for monitoring and understanding the effectiveness of our



16.1. GBS only processes your personal information in compliance with this privacy policy and in accordance with the relevant data protection laws. If you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the ICO. In the first instance, complaints should be directed to GBS Data Protection Wrp0a Lg2-2( )tection





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 we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

19.1.2. **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

19.1.3. **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.

## **YOUR LEGAL RIGHTS**

You have the right to:

19.1.4. **Request access**

and to check that we are lawfully processing it.

19.1.5. **Request correction**



authority vested in the controller, on the grounds of public interest in the area of public



not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.