



## 051a. Privacy Policy

<b>Policy owner:</b>	<b>Marketing &amp; Partnerships Director (Data Protection Lead)</b>
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## Introduction

This Privacy Policy describes the information collected from visitors to the IFG website. We may revise this Privacy Policy from time to time by updating this posting, with the new terms taking effect on the date of posting. You can determine if any changes were made to this Privacy Policy by noting the date that the Privacy Policy was last updated.

### Data Protection Lead

To ensure compliance in this area, IFG has a Data Protection Lead who fulfils the following responsibilities:

- Informs and advises IFG Board, senior management and staff on obligations under UK GDPR (2018) and UK DPA (2018)
- Monitors compliance, including policies, procedures, training, audits and data protection impact assessments
- Is the contact point for data subjects (students, staff) on processing issues and for the ICO/OfS/supervisory or other authorities on data-related matters
- Handles Subject Access Requests and Freedom of Information Requests
- Provides advice on Data Processing Impact Assessments (and lawful bases decision-making and records) and monitors their execution where required
- Leads on investigations of alleged breaches by IFG (notifying ICO if necessary), and delivers training/awareness programmes
- Collaborates on IFG data governance, records management and privacy-by-design in systems like HESA submissions

The Data Protection Lead can be contacted on: [s.green@intfoundationgroup.co.uk](mailto:s.green@intfoundationgroup.co.uk)

## What Information is collected about you?

We collect some information automatically from visitors to the website; for example, through the use of “cookies” and other tracking mechanisms. We collect at least the following:

- your domain name and host for Internet access;

- the Internet address of the site from which you came;
- the date and time of your access;
- Technical information, including your computer's IP address (which may be masked or anonymised), operating system, browser type, and host, alongside the date, time, and specific pages you access on the Site.

For specific details of how IFG processes higher education student information, please see the HE Student Data Processing Notice.

For every visitor, our servers automatically log connection data, such as the IP address or domain name. We use this information primarily for security purposes, to diagnose server issues, and to administer the Website. While IP addresses are used to identify general geographic trends and broad demographic information, we employ measures—such as IP anonymisation within our analytics tools—to protect your identity. This data helps us continuously improve site content and user functionality.

It is always your choice, or the choice of anyone acting on your behalf, whether to provide personal information. Personal information may include information such as name, address, date of birth or any other information from which the individual can be identified. Any personal information you provide us with will be processed in line with our Data Management and Protection Policy, which is detailed in a separate document which complies with the General Data Protection Regulations (2018).

In line with general good practice on the internet, we recommend that you use common sense and good judgement before disclosing any personal information and you should not provide personal information about others without their express consent. By submitting any personal information about others, you represent and warrant that you are authorised to do so.

## How we use the Information

We do not provide any personally identifiable information relating to the users of our website to other organisations or individuals without their express permission, other than information that users post on interactive sections of the website. We may use anonymous information gathered from the website for the management and improvement of the website. Where you have consented, we may also send you marketing information from time to time by post, telephone and email about products and services we think may be of interest to you.

IFG uses Google Workspace for Education, including Google Drive, to support teaching, learning and administration. Google acts as a data processor on behalf of IFG. Personal data may be stored or processed in Google data centres located outside the UK. These transfers are safeguarded by the UK Addendum to the EU Standard Contractual Clauses and Google's ISO-certified security framework. Google provides encryption, access controls and audit logs to protect personal data. IFG configures these tools to ensure compliance with UK GDPR and the Data Protection Act 2018.

"We only disclose personal data where this is necessary for the purposes set out in this notice, where we are required to do so by law, or where we have a lawful basis to share the information. This may include sharing data with government bodies, regulators, law enforcement agencies, or other organisations where we are legally obliged to do so or where disclosure is necessary to protect the vital interests of an individual.

We do not share personal data with third parties for unrelated purposes, and we do not sell personal data. Any sharing of personal data is carried out in accordance with the UK GDPR and the Data Protection Act 2018.

We retain and dispose of personal data in line with our retention schedule and legal obligations; we do not delete or dispose of information arbitrarily.

All personal information is processed in line with the UK General Data Protection Regulations (2018) and the Data Protection Act (2018).

We do not provide any personally identifiable information relating to the users of our website to other organisations or individuals without their express permission, other than information that users post on interactive sections of the website.

We do not hold or share any information overseas.

## **How long we hold your information**

We will only retain your personal information for as long as is necessary to fulfil the purposes we collected it for. 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 cases, such as when a visitor has made an application or registered their interest in a programme of study via the website or has made an online purchase, we will retain the relevant personal information for longer, and for a maximum of 7 years from the date of the visitor's last interaction.

## **Information Sharing**

We share personal data with third parties where there are specific lawful purposes. We do not share personal data with third parties for unrelated purposes, and we do not sell personal data. Any sharing of personal data is carried out in accordance with the UK GDPR and the Data Protection Act 2018.

We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and users with our business partners, trusted affiliates and advertisers for the specific marketing campaigns.

## **Cookies**

We may place a "cookie" on the browser of your computer. Cookies are pieces of information that a website transfers to your computer's hard drive for record-keeping purposes. The use of cookies is common on websites and many major websites use them to provide useful features to their visitors. The cookie itself does not contain any personally identifying information, but may be used to tell when your computer has contacted our Website. You may set your browser to reject cookies, but please understand that certain features of the Website may not be available if your browser does not accept cookies. We will never use or install spyware on your computer.

We also may use cookies, clear gifs and log file information to:

- (a) store information so that you will not have to re-enter it during your visit or the next time you visit the Website;
- (b) monitor aggregate metrics such as total number of visitors, pages viewed, etc.; and
- (c) track entries, submissions and status in any interactive portion of the website.

## **Security**

We will use technical and organisational measures to safeguard your personal information. While we will use reasonable endeavours to safeguard your personal information, the use of the internet is not entirely secure

and we cannot guarantee the security or integrity of any personal information transferred from you or to you through the internet.

## Links

The Website may contain links to other sites. We are not responsible for the privacy practices, the terms and conditions of use, or any of the content of such websites. The linked sites may collect personal information from you that is not subject to our control. The data collection practices of linked sites will be governed by that site's privacy policy.

## Note about Children's Privacy Issues

Our primary audience is adults and young adults. We do not intend to collect any personal information from children under the age of 13. Any use of the website by children under the age of 13 should be conducted under the supervision of that child's parent or guardian. Information should not be submitted to or posted on the website by anyone under 13 years of age without the consent of their parent or guardian. Children can browse the website without any personal information being collected.

IFG follows guidance from the Information Commissioner's Office (ICO) Children's Code.

## Modifying or Removing Personal Information

You may change your registered details or cancel their registration by emailing our data controller at [s.green@intfoundationgroup.co.uk](mailto:s.green@intfoundationgroup.co.uk). You are also entitled to access the information we hold about you, and there would be no charge for this.

## Your Legal Rights

Under data protection law, you have a number of rights over your personal information, including:

- **Your right of access:** You have the right to ask us for copies of your personal information.
- **Your right to rectification:** You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure:** You have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing:** You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to object to processing:** You have the right to object to the processing of your personal information in certain circumstances.
- **Your right to data portability:** You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request we have one month to respond to you. Send your request to: [s.green@intfoundationgroup.co.uk](mailto:s.green@intfoundationgroup.co.uk)

## Complaints

Internal complaints

Students

If a student has any concerns about our use of their personal information, they can make an informal complaint under Stage 1 of the Student Complaints Procedure to IFG's Data Protection Lead by emailing: [s.green@intfoundationgroup.co.uk](mailto:s.green@intfoundationgroup.co.uk)

*Staff*

Staff can raise a concern about our use of their personal information by emailing the Data Protection Lead: [s.green@intfoundationgroup.co.uk](mailto:s.green@intfoundationgroup.co.uk)

*Applicants*

Applicants may raise a complaint about our use of their personal information via the IFG Admissions Appeals and Complaints Procedure.

External complaints

If you are unhappy with how we have used your data, you can complain to the Information Commissioner's Office (ICO)

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>