

PUBLIC

**Northchild Education (UK) Ltd
External Privacy Notice**

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Northchild Education (UK) Ltd

External Privacy Notice

Last Updated: 13/02/2025

1. Who we are and what we do

Who we are

We are Northchild Education (UK) Ltd ("Northchild", "us", "we", "our"). We are a limited company registered in England and Wales under registration number 14077748 and we have our registered office at 1 Mark Street, London, United Kingdom, E15 4GY. We are registered with the UK supervisory authority, Information Commissioner's Office ("ICO"), in relation to our processing of Personal Data under registration number ZB583109.

What we do

We are forging ahead with the construction of innovative collaborative learning spaces embedded in urban London, UK with our partner, the University of Portsmouth. The spaces we create stimulate learning and innovation, transforming communities and lives. We are committed to protecting the privacy and security of the Personal Data we process about you.

Unless we notify you otherwise, we are the controller of the Personal Data we process about you. This means that we decide what Personal Data to collect and how to process it. We may also act as a processor of your personal data where we process it on behalf of our partners, such as Portsmouth University. Please note that this Privacy Notice does not apply where we are a data processor, should you wish to understand how the data controller processes your personal data, you should refer to their Privacy Notice instead.

2. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the 'How to contact us' section, or alternatively, you can use the form provided within the 'Contact' section of this website.

3. Who this privacy notice applies to

This privacy notice applies to you if:

1. You visit our website
2. You are a UoPL student
3. You are a UoPL Pathway College student
4. You purchase goods or services from us
5. You enquire about our products and/or services
6. You sign up to receive newsletters and/or other promotional communications from us
7. You rent a property from us

4. What Personal Data is

‘Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

‘Special Category Personal Data’ is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation.

5. Personal Data we collect

The type of Personal Data we collect about you will depend on our relationship with you. Below is an example of the different categories of personal data we may collect and process about you.

- Full name
- Date of birth
- Address
- Phone number
- Email address
- CCTV footage
- Health data
- Financial data

6. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, text or email and/or via our website.

However, we may also collect your Personal Data from third parties such as:

- reputable companies who provide lead generation contact lists
- others to whom you have provided consent
- publicly available sources such as social media platforms
- our partners, such as the University of Portsmouth

7. How we use your personal data

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:

- To engage with you when you express an interest in our services
- To tell you about our services and any offers we might have
- To provide our services
- To provide updates about the service you are receiving

8. Lawful basis for processing

Applicable Data Protection legislation requires us to identify appropriate lawful bases to process personal data. The lawful basis we rely on as a data controller are detailed below with brief examples for when they may apply:

Lawful Basis	Purpose of processing
Performance of Contract	To provide our services to you
Legal Obligation	To comply with any obligations under applicable legislation we have
Legitimate Interests	To ensure visitors to our website are getting the best experience
Consent	To tell you about our services

9. Sharing your Personal Data

We may share your Personal Data with our carefully selected third parties, including but not limited to:

- Our partners
- Other organisations we engage to help provide our services
- Government/law enforcement for the purposes of preventing and detecting crime, if we are required to do so by law.

10. International Transfers

Your Personal Data may be processed outside of the UK. This is because the organisations we use to provide our service to you are based outside the UK.

We have taken appropriate steps to ensure that the Personal Data processed outside the UK has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that:

- Your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation), or;
- We enter into an International Data Transfer Agreement (“IDTA”) with the receiving organisation and adopt supplementary measures, where necessary.

11. Your rights and how to complain

You have certain rights in relation to the processing of your Personal Data. Please select your jurisdiction below to see the Data Protection rights afforded to you under the relevant legislation.

United Kingdom

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a “Subject Access Request”)
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification**
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)
You have the right to ask us to delete your Personal Data.
- **Right to object to processing**
You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing**
You have the right to restrict our use of your Personal Data.
- **Right to portability**
You have the right to ask us to transfer your Personal Data to another party.
- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.
- **Right to withdraw consent**
If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw

your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.

- **Right to lodge a complaint**

You have the right to lodge a complaint with the relevant supervisory authority, if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in the UK is the Information Commissioner's Office who can be contacted online at:

[Contact us | ICO](#)

Or by telephone on 0303 123 1113

California

If you live in California, we comply with the California Consumer Privacy Act of 2018 (CCPA) and the California Privacy Rights Act of 2020 (CPRA) and you have the following rights in relation to the processing of your personal data:

- **Right to be informed**

The CCPA as amended provides that a business that controls the collection of a consumer's personal information shall, at or before the point of collection, inform consumers as to:

- The categories of personal information to be collected and the purposes for which the categories of personal information are collected or used and whether such information is sold or shared;
- If the business collects sensitive personal information, the categories of sensitive personal information to be collected and the purposes for which the categories of sensitive personal information are collected or used and whether such information is sold or shared; and
- The length of time the business intends to retain each category of personal information, including sensitive personal information, or if that is not possible, the criteria used to determine such period.

- **Right to access**

A consumer has the right to request that a business that collects their personal information disclose the following upon a verifiable request:

- The categories of personal information is has collected about that consumer;
- the categories of sources from which the personal information is collected;

- the business or commercial purpose for collecting, selling, or sharing personal information;
- the categories of third parties to whom the business discloses personal information; and
- the specific pieces of personal information it has collected about that consumer.

- **Right to rectification**

A consumer has the right to request that a business that maintains inaccurate personal information about the consumer to correct that inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information. In addition, a business must disclose to the consumer their right to request the correction of inaccurate personal information.

- **Right to Erasure**

A consumer has the right to request, free of charge, that a business delete any personal information about the consumer which the business has collected from the consumer. In addition, a business that collects personal information about the consumer must disclose to the consumer their right to request the deletion of their personal information.

In response, the business must delete the consumer's personal information from its records and direct any service providers to delete the consumer's personal information from their records.

- **Right to object/opt-out**

A third party is prohibited from selling personal information about a consumer that has been sold to the third party by a business unless the consumer has received explicit notice and is provided an opportunity to opt-out.

A consumer has the right, at any time, to direct a business that sell or share personal information about the consumer to a third party or to not sell or share the consumer's personal information which is also known as the opt-out right.

- **Right to data portability**

A business must provide the specific pieces of personal information obtained from the consumer in a format that is easily understandable to the average consumer, and to the extent technically feasible, in a structured, commonly used, machine-readable format, which also may be transmitted to another entity at the consumer's request without hindrance.

- **Right to not be subject to automated decision-making**

The CCPA as amended does not explicitly refer to a right to not be subject to automated decision making, but it does stipulate that the attorney general may adopt regulations in this area.

- **Other rights**
 - A consumer has the right to not be discriminated against because of the exercise of any of the consumer's rights;
 - A consumer has the right to direct a business that collects sensitive personal information about the consumer to limit its use of the consumer's sensitive personal information to what is necessary to perform the services or provide the goods reasonably expected

Australia

If you live in Australia, we comply with the Australian Privacy Act 1988 (Cth) and you have the following rights in relation to the processing of your Personal Data:

- **Right to be informed**

You have the right to know details such as what personal data we collect about you, who we share it with, how we use it, for what purpose and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a "Subject Access Request")

You have the right to access and receive a copy of the Personal Data we hold about you.
- **Right to rectification**

You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to object to processing**

You have the right to object to us processing your Personal Data and to stop receiving unwanted direct marketing.
- **Right to withdraw consent**

If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.
- **Right to complain**

You have the right to complain about us to the [Office of the Australian Information Commissioner \("OAIC"\)](#), if you think we have mishandled your Personal Data whose contact details are:

[Contact us - Home \(oaic.gov.au\)](#)

Canada

If you live in Canada, we comply with the Personal Information Protection and Electronic Documents Act 2000 (PIPEDA) and you have the following rights in relation to the processing of your Personal Data:

- **Right to be informed**

PIPEDA does not directly provide for a right to be informed but notes that in collecting consent, individuals should understand the nature and purposes of the processing of their data. An organization must make readily available specific information about its policies and practices concerning its management of personal information to individuals, including:

- name or title and address of the person who is accountable for the organization's privacy policies and practices and to whom complaints or inquiries can be forwarded;
- how an individual can gain access to their personal information;
- a description of the type of information held, including a general account of its use;
- brochures or other information which explain the organization's policies, standards, or codes; and
- a description of what personal information is made available to other organizations, including subsidiaries.

- **Right of access** (commonly known as a "Subject Access Request")

Upon request, an organization must inform an individual of the existence, use, and disclosure of their personal information and must give the individual access to that information. In addition to providing access to the information that an organization holds on an individual, organizations are encouraged to indicate the source of such information, an account of the use that has been made or is being made of the personal information, and an account of the third parties to which it has been

disclosed.

- **Right to rectification**

The right to rectification within PIPEDA is linked to and follows from, the access principle of PIPEDA, in that individuals must be able to challenge the accuracy and completeness of the information they are provided access to, and to have it amended as appropriate.

- **Right to erasure**

PIPEDA does not explicitly refer to the right to erasure but provides that personal information held by an organization that is no longer necessary to fulfil the identified purposes must be destroyed, erased, or made anonymous. An organization must also develop guidelines and implement procedures that concern the destruction of personal information.

- **Right to object to processing**

PIPEDA does not explicitly provide for the right to object. However, PIPEDA provides for the right for individuals to withdraw consent at any time subject to legal or contractual restrictions and reasonable notice.

Individuals may file a written complaint with the Office of the Privacy Commissioner of Canada (OPC) against an organization for contravening a provision of Divisions 1 or 1.1 or for not following a recommendation set out in Schedule 1 of PIPEDA (Section 11(1) of PIPEDA which the OPC may investigate if there are reasonable grounds (Section 11(2) of PIPEDA).

[Report a concern - Office of the Privacy Commissioner of Canada](#)

How to exercise your rights

You will not usually need to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

12. Under 18's Privacy and Safeguarding

We understand the importance of ensuring children's data is kept safe. As such, we have implemented appropriate security measures and procedures to mitigate risks associated with the loss, erasure or unauthorised disclosure of their data. Should we become aware of any compromise to a child's data, we will inform relevant parties as needed and required under data protection legislation.

13. Automated Decision-Making and Profiling

We do not use Automated decision making or profiling as part of our services.

14. Use of Cookies and Similar Technologies

Our website utilises cookies and similar technologies. You can find out more by viewing our cookie notice.

15. Security and storage of information

We have 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, we limit 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.

If we become aware of any loss, misuse, alteration of personal data we will work closely with our IT team, DPO and other parties as necessary to investigate the incident at hand. We have put into place the relevant procedure and policies in place to investigate, mitigate and report (when needed to relevant parties) such instances.

16. Data Retention

We will not keep Personal Data longer than is necessary, for the purpose or purposes for which they were collected. Northchild will take all reasonable steps to destroy, or erase from its systems, all Personal Data which is no longer required. This does not apply to anonymised data.

17. How to contact us and our Data Protection Officer

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact us as follows:

1 Mark Street
Stratford, London
E15 4GY
United Kingdom
E: dpo@northchild.com

We have also appointed a Data Protection Officer (“DPO”). Our DPO is Evalian Ltd can be contacted as follows:

Evalian Limited
West Lodge
Leylands Business Park
Colden Common
Hampshire
SO21 1TH
United Kingdom

Phone: +44 (0)333 050 0111

Website: www.evalian.co.uk

19. Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified: 13/02/2025

You can contact us for previous versions of this Privacy Notice.