 PRIVACY POLICY

The Central Applications Board Limited (the “CAB”) is committed to protecting your privacy when dealing with your personal data. This Privacy Policy sets out how the CAB collects and shares your personal data with the universities to which applications are made. All information received in electronic means for processing by the CAB system will be processed in accordance with the documented purposes as defined below. Please read this Privacy Policy carefully.

1. Introduction

By submitting your application, you understand that we will be processing and sharing your personal data with the universities to which your application is made, as set out in this Privacy Policy. You have declared that the information given in the application is true, complete and accurate and no data requested has been omitted.

We will use your personal data in order to process your application and will share your application and your personal data with the universities applied to. The information contained in your application form may also be used for statistical analysis (see section 5).

All the parties who have access to your personal data may retain a copy of that data for official use and reference.

Further information about the way in which the CAB will use submitted data and regulate access to it, is set out below, and you should read and understand this before registering your details and/or submitting your application to the CAB.

About Us

In this Privacy Policy references to "we" or "us" or "the Central Applications Board Limited" or "the CAB" are to:

Central Applications Board Limited, a company registered in England and Wales (company number 09156393) with registered address at The St Botolph Building, 138 Houndsditch, London, EC3A 7AR. We act as data controller in respect of the personal data that we process.

If you have any questions about how we collect, store or use your information, you may contact us by e-mailing us at applications@lawcabs.ac.uk or by telephoning +44 (0) 20 3603 5101 and leaving a message (please note that responses to telephone massages will be sent by email) or writing to us at Central Applications Board Limited, c/o Hook Tangaza, 20 Little Britain, London EC1A 7DH

Changes to the Policy

We may change the content of our website without notice, and consequently our Privacy Policy may change from time to time in the future. We therefore encourage you to review our Privacy Policy when you visit the website from time to time to stay informed of how we are using your personal data.

This Privacy Policy was last updated on 21st May 2018.
2. What personal data do we collect and process?

Information you provide to us

Applications

Personal data that you provide to us:

- will include:
- title;
- first name;
- middle name(s) (where applicable);
- surname;
- date of birth;
- address(es);
- gender
- email address;
- contact telephone number;
- education history;
- academic grades (including predicted grades, where applicable);
- name and personal details of referee (see below);
- may include:
- employment history, where applicable;
- data relating to first entry into the UK, permanent residence and passport details;
- personal statement (applicant provides whatever information they feel is relevant)
- a character reference (provided by your chosen referee)

Payment of the application fee is made via a link to Worldpay (UK) Limited’s website. CAB do not collect or retain your card details.

Sensitive personal data that you provide to us:

- will include:
- ethnicity (not mandatory)
- disability
- confirmation of whether or not the applicant has unspent criminal convictions
Referee Data
will include:

- first name;
- surname;
- position within institution/organisation
- email address; and
- contact telephone number.

Personal data that we collect from referees:
will include:

- confirmation of predicted grade
- personal reference (free format text)

Correspondence
If you contact us, we may keep a record of that correspondence and our response to you. See section 7.

Website usage
Data is collected via cookies. Please see our Cookie and Technical Requirements policy, on our website, for information on how we use cookies.

3. How do we collect personal data?
You should note the following features of the CAB application system with regard to its security, the nature of the information collected by the CAB and the basis on which information collected through the CAB may be shared with third parties.

The CAB is only accessible to users who have been issued with a login username and password by the CAB. Users will be restricted to accessing information associated with their reason for accessing the CAB; these roles are as follows:

1. an applicant – access to their own application forms;

2. a referee - access to application forms where the applicant has identified the referee as being requested to provide a reference for them;
3. an institution user – access to application forms where the applicant has stated a choice for attending their institution; and

4. a CAB administrator – access to all information contained within the CAB.

We collect your personal data:

- via the CAB online applications system;
- by email.

CAB records the following personal data of users accessing the system:

- the data they have personally entered in to CAB / have had entered on their behalf
- a record of their last login date and time.

4. Who do we collect personal data from?

We collect personal data:

- From you
- From referees
- From our website

The CAB collects and records personal data of users accessing the system (held in the central IT systems) which includes (amongst other things) (i) a log of the IP address of the user, as this is automatically recognised by the web server; and (ii) a record of the user's last login date and time.

5. What do we use your personal data for?

We have set out in this section the reasons why we use your personal data and the legal basis for using your personal data for that particular purpose.

We may use your information:

To administer applications to the universities to which such applications are made: We may communicate with you by email and post in connection with your application to provide you with information and updates about your application.

Legal basis for use:

We use your personal data for this reason because it is in our legitimate interests to process your personal data in relation to your application.
To administer applications to the universities to which such applications are made:

We collect sensitive personal data for the purposes of producing statistical data (see below), this includes gender, ethnicity and nationality.

We also collect sensitive personal data relating to disabilities and confirmation as to whether applicants have unspent criminal convictions to provide the relevant universities with information which they use to assist in the administration of their responses to applicants.

Legal basis for use:
Your personal data is used for this reason because you have given your consent.

To inform you of changes to the CAB:

We may contact you if the CAB is part of a re-organisational change where we may need to transfer some or all of your personal data to the relevant third party (or its advisors), your personal data would continue to be used for the same purposes set out in this policy or for the purpose of analysing any reorganisation.

Legal basis for use:
We may need to use your information to achieve the legitimate interest of allowing us to make changes to how the CAB operates.

For statistical analysis purposes:

We may use your personal data for statistical analysis purposes to, amongst other things, produce reports which show the proportion of applicants who received an offer, were rejected, deferred or started at a university. Final reports do not contain any personal data.

Legal basis for use:
We may need to use your information to achieve the legitimate interest of allowing us to undertake statistical analysis of the users of our online application system, as outlined above.

6. Who do we share your personal data with?

Disclosures to the CAB
Personal data is shared internally at the CAB, for the statistical purposes described in this Privacy Policy and:

- via access and processing on central IT systems; and
- via internal reports; and
- to respond to email or postal queries from applicants

**Disclosures to universities**

Personal data is shared with universities for the purposes of processing and administering the applications made by applicants described in this Privacy Policy.

Following submission of your application, you may be contacted by Institutions to invite you to open days or other events related to the course you have applied for.

You may also be contacted by them if they have any queries regarding your application form, such contact does not constitute an offer of a place nor imply that an offer will be made.

The universities may initially contact you using any of the contact details provided in your application. Any other contact by the universities you have applied to is covered by their own Privacy Policies. Links to the universities websites are provided on the CAB’s website (www.lawcabs.ac.uk).

**Disclosures to third parties**

Our third party service providers.

CAB records the following personal data of users accessing the system:

- the data they have personally entered in to CAB / have had entered on their behalf
- a record of their last login date and time.

7. **How long do we keep your personal data for?**

We keep your personal data only for as long as reasonably necessary for the reasons described in this Privacy Policy, for example where your personal data is stored:

- to administer applications to the universities to which such applications are made
  - If you submit an application we will retain that application in full for four years after the last course start date on that application.
  - If you commence an application form but it has not been completed after 1 year it is deleted.
• If you have registered on the system but have not completed or started an application for more than 1 year then your record and log in details are deleted.

• If you are a referee and have no applications associated with you, per the above deletion policy, your record and log in details are deleted.

where legal claims are contemplated

• We will retain your personal data for this purpose, where we reasonably believe that information will be necessary to defend or prosecute or make a claim against you, us or a third party, for six (6) years after the circumstances have arisen which may give rise to a claim.

for statistical analysis of submitted applications

• We will retain your personal data for this purpose for up to four years after the last course start date on that application.

8. Your rights

You have certain rights under data protection legislation in relation to the personal data that we hold about you. These rights are subject to certain exemptions such as public interest (e.g. prevention of crime) and our interests (e.g. maintaining legal privilege). Your rights include:

• the right to access your personal data;

• the right to rectification of your personal data;

• the right to erasure of your personal data;

• the right to restrict or object to the processing of your personal data;

• the right to withdraw your consent to the processing of your personal data at any time where such processing is based on your consent;

• the right to data portability;

• the right to object to receiving marketing; and

• the right to complain to your supervisory authority about the use of your personal data. In the UK this is the Information Commissioner's Office.
If you would like to contact us about your rights, please see the contact details in section 1, About Us.