

Santander Universities is a division of Santander UK plc, the data controller. You can contact our Data Protection Officer (DPO) at 201 Grafton Gate East, Milton Keynes, MK9 1AN if you have any questions.

This is our Privacy Statement which explains how we obtain, use and keep your personal data safe particularly in relation to the events, grants, competitions, offers, courses and other initiatives you apply for and participate in (the “**Programmes and Initiatives**”) Your personal data is data which by itself or with other data available to us can be used to identify you. We're committed to keeping your personal information safe in accordance with applicable data protection laws.

It is important that you read this Privacy Statement together with any other privacy information that we, [partner universities](#) and/or [partner businesses](#) on specific events, competitions and other initiatives provided from time to time so that you are fully aware of how and why we are using your data. This Privacy Statement supplements other privacy information and is not intended to override it. Privacy information is separately available in relation to the Santander website ([santander.co.uk](#)) and Universia Holding, S.L who act as a data processor on our behalf when you use the BECAS platform.

## **The types of personal data we collect and use**

The types of personal data we capture and use will depend on what you disclose, how you communicate with us (e.g. by email or telephone), and what you are doing on the website used. We'll use your personal data for some or all of the reasons set out in this Privacy Statement.

Examples of the personal data we use may include:

- Full name and personal details including contact information (e.g. home address, email address, home and mobile telephone numbers);
- Gender, nationality, date of birth and/or age (to make sure that you are eligible to apply for any of the Programmes and Initiatives); Family, lifestyle or social circumstances (e.g. the number of dependants you have) if relevant to any of the Programmes and Initiatives you apply for;
- Education and employment details/employment status if you apply for any of the Programmes and Initiatives, which may include your University, your degree type and subject of study, year of study, your Student ID number, the value of your grant/donation/internship, information on your start-up, business financial information (e.g. turnover);
- Photographs and videos in relation to your participation in Programmes and Initiatives;
- Personal data about other named individuals as required. Where you provide the personal data of others you must have their authority to provide their personal data to us and share this Privacy Statement and any related data protection statement with them beforehand together with details of what you've agreed on their behalf.

- When requested, and with your consent, special category personal data which for example reveals or concerns your health, racial or ethnic origin, sexual orientation

## Providing your personal data

We'll tell you if providing some personal data is optional, including if we ask for your consent to process it. In all other cases, if you fail to provide the requested personal data, we may be unable to process or respond to your application, query or service.

We collect personal data about you when you interact directly by:

- (a) contacting us through our website, by email, telephone, and/or social media, such as Facebook, Twitter and LinkedIn;
- (b) registering and/or applying for any of the Programmes and Initiatives on a website;
- (c) participating in any of the Programmes and Initiatives; or
- (d) completing feedback or surveys;

We may receive information about you from other sources (such as partner universities and partner businesses), which we will add to the information we already hold about you in order to help us provide our Programmes and Initiatives in accordance with your requirements and to improve and personalise our service to you.

## Monitoring of communications

Subject to applicable laws, we'll monitor and record your calls, emails, text messages, social media messages and other communications in relation to your dealings with us. We'll do this for regulatory compliance, self-regulatory practices, crime prevention and detection, to protect the security of our communications systems and procedures, to check for obscene or profane content, for quality control and staff training, and when we need to see a record of what's been said.

## Using your personal data: the legal basis and purposes

We'll process your personal data:

1. As **necessary to perform a contract** with you for the relevant Programmes and Initiatives, or for taking steps to comply with a request you made with a view to entering into a contract, for example:

- a) To take steps at your request prior to entering into it;
- b) To decide whether to enter into it;
- c) To manage and perform that contract, which may include Santander Universities, other businesses in the group, our partner universities or partner businesses contacting you in relation to any of the Programmes and Initiatives (for example, to request your participation in events relating to a Programme, or determine if you have successfully passed to the next stage of a Programme,)
- d) To update our records.

2. As necessary **for our own legitimate interests** or those of other persons and organisations, for example:

- a) For good governance, accounting, and managing and auditing our business operations,
- b) To monitor emails, calls, other communications, and activities on your account;
- c) For market research, analysis and developing statistics, which may include Santander Universities or other areas of the group contacting you to understand and assess the impact the Santander donations funding you have received has had on you; and
- d) To send you marketing communications, including automated decision making relating to this.

3. As necessary **to comply with a legal obligation**, for example:

- a) When you exercise your rights under data protection law and make requests;
- b) For compliance with legal and regulatory requirements and related disclosures;
- c) For establishment and defence of legal rights;
- d) For activities relating to the prevention, detection and investigation of crime;
- e) To verify your identity, make credit, fraud prevention and anti-money laundering checks; and
- f) To monitor emails, calls, other communications, and activities on your account.

4. Based on **your consent**, for example:

a) When you request us to disclose your personal data to other people or organisations, or otherwise agree to disclosures, such as our disclosure to partner universities for their own statistical and analytical purposes;

(b to verify your status as a student.

(c) When we process any special categories of personal data about you (e.g. your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning your health, sex life or sexual orientation); and

(d) To send you marketing communications where we've asked for your consent to do so, such as in relation to relevant:

- Programmes and Initiatives academic activities such as conferences, courses and congresses,
- services, products or activities in connection with research, technology, telecommunications, professional openings and job searches, culture, assistance with study and training, work and projects

You're free at any time to change your mind and withdraw your consent. The consequence might be that we can't do certain things for you. To the extent that action has already been taken based on your consent, withdrawal of your consent will not apply to the processing of your personal data that has already occurred, based on your consent.

## Sharing of your personal data

Subject to applicable data protection law we may share your personal data with:

- The Santander group of companies\* and associated companies in which we have shareholdings;
- Sub-contractors and other persons who help us provide our Programmes and Initiatives, including [partner universities](#) and/or [partner businesses](#);
- Companies and other persons providing services to us;
- Our legal and other professional advisors, including our auditors;
- Law enforcement bodies;
- Government bodies and agencies in the UK and overseas (e.g. HMRC who may in turn share it with relevant overseas tax authorities and with regulators e.g. the Prudential Regulatory Authority, the Financial Conduct Authority, the Information Commissioner's Office);
- Courts, to comply with legal requirements, and for the administration of justice;
- In an emergency or to otherwise protect your vital interests;
- To protect the security or integrity of our business operations;
- When we restructure or sell our business or its assets or have a merger or re-organisation;
- Market research organisations who help to improve our Programmes and Initiatives; and
- Anyone else where we have your consent or as required by law.

## **International transfers**

In some instances, your personal data may be transferred outside the UK and the European Economic Area. While some countries have adequate protections for personal data under applicable laws, in other countries steps will be necessary to ensure appropriate safeguards apply to it. These include imposing contractual obligations of adequacy or requiring the recipient to subscribe or be certified with an 'international framework' of protection. More details can be found in our ['Using My Personal Data' booklet \(121 KB\)](#).

## **Automated decision making and processing**

Automated decision making involves processing your personal data without human intervention to evaluate your personal situation, such as for example confirming eligibility for competitions or grants by having completed a minimum percentage of a course, and/or deciding the outcome of competitions. All such activity is on the basis of our legitimate interests and to develop and improve our Programmes and Initiatives. Further details can be found in the 'Using My Personal Data' booklet (121 KB).

## **Using our video services**

You may be able to apply for some of our Programmes and Initiatives using a video session from your mobile device in high quality two-way video.

If you use our video services, both the images and the audio will be recorded and may be used for training and monitoring purposes. We'll use any personal data captured about you for the performance of a contract or/with a view to entering into a contact with us as well as for our legitimate interests for good governance, accounting, managing and auditing our business operations, and to monitor emails, calls, other communications in relation to your dealings with us. Please see the monitoring of communications section for more information and the criteria for retention periods section for more information on the criteria we use to determine our retention periods.

You're entitled to record your video session only for your own personal use and you should avoid sharing any footage with third parties or posting it on any websites. For your own privacy and protection please ensure that your location doesn't include items and images that you don't wish to be recorded.

## **Using your personal information for direct marketing**

We'll tell you if we intend to use your information for marketing purposes and we'll give you the opportunity to opt out if you want to (unless we need consent to use your information for marketing purposes – if we do we'll seek one). If you receive marketing emails and don't want to in future, please use the unsubscribe link within the email and we'll remove you from future campaigns.

## **Surveys and competitions**

We'll treat any survey or competition information you provide with the same high standard of care as we do all other information, using any details provided strictly within the terms of the competition and this Privacy Statement.

## **Cookies**

Cookies are small text files placed on your computer, smartphone or other device and are commonly used on the internet. We use cookies and similar technologies to:

- collect information that will help us understand visitors' browsing habits on our website;
- compile statistical reports on website activity, e.g. number of visitors and the pages they visit;
- temporarily store any information which you may enter in tools, such as calculators or demonstrations on our website; and
- in some cases, remember information about you when you visit our site. We may need to do this to provide some of our services.

We use cookies to enable us to perform our contract with you and for our legitimate interests (e.g. to help us improve our service). We'll also ask your consent for non-essential cookies. To find out more about all types of cookies and how to control and delete them, including clearing your browsing history, you can read our cookie policy [here](#).

## **Criteria used to determine retention periods (**

The following criteria are used to determine data retention periods for your personal data:

- **Retention in case of queries.** We'll retain your personal data as long as necessary to deal with your queries (e.g. if your application is unsuccessful) or for a sensible period in order for us to reply to your online query and then deal with queries you raise upon receipt);
- **Retention in case of claims.** We'll retain your personal data for as long as you might legally bring claims against us; and
- **Retention in accordance with legal and regulatory requirements.** We'll retain your personal data after our relationship has come to an end, based on our legal and regulatory requirements.

## Your rights under applicable data protection law

Your rights are as follows:

- The **right to be informed** about our processing of your personal data;
- The right to have your personal data **corrected if it's inaccurate** and to have **incomplete personal data completed**;
- The right to **object** to processing of your personal data;
- The right to **restrict processing** of your personal data;
- The right to **have your personal data erased** (the "right to be forgotten");
- The right to **request access** to your personal data and information about how we process it;
- The right to **move, copy or transfer your personal data** ("data portability"); and
- Rights in relation to **automated decision making** including profiling.

You have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law: [ico.org.uk](http://ico.org.uk).

For more details on all the above you can contact our DPO, view the ['Using My Personal Data' booklet \(121 KB\)](#).

## Data anonymisation and aggregation

Your personal data may be converted into statistical or aggregated data which can't be used to identify you, then used to produce statistical research and reports. This aggregated data may be shared and used in all the ways described above.

### \*Group companies

For more information on the Santander group companies, please see the ['Using My Personal Data' booklet \(121 KB\)](#).

## Changes to this Privacy Statement

We'll notify you if there are any material changes to this Privacy Statement if required by applicable law or where we intend to process your personal data for a new purpose before we start that new processing activity.

### **Legal statement about this Privacy Statement**

This Privacy Statement is not designed to form a legally binding contract between Santander and you.

### **Contacting us about our Privacy Statement**

Contact us, or write to our DPO at 201 Grafton Gate East, Milton Keynes, MK9 1AN if you have any questions.