

## 2018 – 2021 Student Data Protection Notice

StudySmart needs to collect and process personal data in order to provide services to students, manage its operations effectively and meet certain legal requirements.

### Purpose of this Notice

This Notice explains how we collect and use your personal data.

StudySmart is the Data Controller for personal data we process about you. StudySmart is the Data Controller and manages personal data in accordance with StudySmart's Data Protection Policy (available online at [www.studysmart.gr/dataprotection](http://www.studysmart.gr/dataprotection))

Throughout this Notice, "StudySmart", "we", "our" and "us" refers to StudySmart and "you" and "your" refers to those expressing an interest in becoming a student at StudySmart both prior to and at formal application stage", together with those who later become a registered student at StudySmart.

### Change in the Law

Until 24 May 2018, we shall process your personal data in accordance with the Data Protection Act 2472/1997 (the DPA). From 25 May 2018, we shall process your personal data in accordance with the General Data Protection Regulation (or GDPR for short).

This notice complies with requirements under both DPA and GDPR.

### Changes to this Notice

Prior to implementation of the GDPR, we are likely to make changes to this Notice. Any updates will be accessible here: [www.studysmart.gr/dataprotection](http://www.studysmart.gr/dataprotection)

### Anything you are not clear about

If there is anything you are unclear about please contact our Data Protection Officer which is the Managing Director, who can answer any queries you may have concerning this Notice or the way in which we process your personal data. Our Data Protection Officer's contact details can be found at the end of this Notice.

### Where does StudySmart get your personal data from?

We obtain personal data about you from the following sources:

- From when you provide your contact details for open day activities or to request further information from us, make an application or enroll as a student;
- From third-party sources (such as ACCA, CIMA, ICA, CFA, SHRM, ICAP, other institutions involved in the delivery of joint programmes). Where we obtain personal data from third party sources, we will look to ensure that the third-party has lawful authority to provide us with your personal data according to GDPR;
- From your registration form to a specific programme and/or masterclass; and
- From you when you disclose personal data during the course of your studies or when accessing our services or resources.

### Categories of Personal Data Being Processed

StudySmart collects and processes a limited range of personal data about you in order to deliver our services to you as a student, manage our operations effectively and meet certain legal requirements. Examples of this personal data will include your name, Awarding Body Registration ID number, application information, attendance, assessment marks, address for correspondence, email, telephone numbers, date of birth and invoicing details either yours or your company's (such as: Company Number, AFM, Eforia, etc).

Personal data may also contain “sensitive personal data” as described under the DPA and “special categories of data” as described under the GDPR. Such “sensitive personal data” or “special categories of personal data” are not used and/or required by StudySmart.

### **The purposes for which we process your personal data and the legal basis for that processing**

StudySmart collects and processes a limited range about personal data about you in order to deliver our services to you as a student, manage our operations effectively and meet certain legal requirements. Examples of such services include our residential services, student support services, lecture capture recording, attendance monitoring and Library facilities.

In addition to the above, we set out in **Table 1** of this Notice the other purposes for which we will process your personal data, together with the legal basis for doing so and the categories of third parties with whom we share your personal data with.

### **Retention of Your Personal Data**

StudySmart retains your personal data in accordance with the Greek Regulations and Professional Bodies (which they need to audit StudySmart to establish that fulfil the requirements of an Approved Learning Partner).

Some types of personal data are retained long after your studies have ended, for example, so that we can verify your award or further study. Other types of data, particularly if sensitive, may only be retained for a short time.

### **Unwanted Communication**

We will from time to time communicate with you by email, post, telephone and text. If at any stage you are concerned about the content of these communications, e.g. unwanted marketing information, then:

- please follow any available unsubscribes links or instructions in the communications, or
- contact our Data Protection Officer.

### **Transfers to third-party countries**

We may share your personal data with organizations within the European Union. StudySmart will not share your personal data with organizations outside the European Union.

### **Your Rights As a Data Subject**

We thought it would be helpful to set out your rights as a data subject below. You have the right to:

- Access your personal data that we process;
- To rectify inaccuracies in personal data that we hold about you;
- To be forgotten, that is your details to be removed from systems that we use to process your personal data
- To restrict the processing of your personal data in certain ways
- To obtain a copy of your personal data in a commonly used electronic form
- To object to certain processing of your personal data by us
- To request that we stop sending you direct marketing communications.

If you wish to exercise any of the above rights please contact the StudySmart’s Data Protection Officer via: [data.protection@studysmart.gr](mailto:data.protection@studysmart.gr).

If you wish to access your personal data then you will need to make a request in writing. Instructions and the relevant form to be completed is provided online at [www.studysmart.gr/dataprotection](http://www.studysmart.gr/dataprotection).

**Concerns and Contact Details**

If you have any concerns with regard to the way your personal data is being processed or have a query about this Notice, please contact our Data Protection Officer via [data.protection@studysmart.gr](mailto:data.protection@studysmart.gr).

Our postal address is:

StudySmart  
16 Kifisias Avenue & Chalepa  
Marousi 151 25  
Athens  
Greece

Our Telephone Number is: +30 211 411 3235

**TABLE 1: TO 2018-2021 Data Protection Notice to Students**

No	Specific Purposes	Legal Basis
1	Management of inquiries with prospective students and communication of information about our services, events, and activities	Consent to receive such communications
2	Correspondence with offer holders regarding the next steps in the application and enrolment processes	Necessary for the purpose of entering into a contract of study with students
3	Administration of induction events, registration of students on courses and transfers to new courses	Consent to receive such communications
4	Evaluation of assessments and other coursework such as Mock Exams	Legitimate purpose of ensuring are students achieve professional standards and success through full engagement with their studies
5	To offer and provide additional support services such as careers advice, counseling services, financial advice and access to other activities	Access to these services are optional and thereby consent is relied upon for any processing necessary to deliver the services. StudySmart will obtain explicit consent where sensitive personal data must be obtained to deliver the service.
6	Processing of safeguarding concerns to ensure the safety and well-being of our students	Legitimate purpose of ensuring the safety and well-being of our students
7	Monitoring student attendance at lessons, the submission of assessment and engagement with course material as provided by professional bodies.	Legitimate purpose of ensuring are students achieve professional standards and success through full engagement with their studies
8	To offer facilities and services central to your studies such as Library access and computing access	Necessary for the performance of a task in the public interest, namely the provision of education and as indicated by the Professional Bodies
9	Processing and recovery of StudySmart course fees	Necessary for the performance of the StudySmart's contract with students
10	Administration of external and internal student surveys, including a collection of feedback on distinct services such as tutor evaluation	Consent from students who complete the surveys
11	For research and statistical analysis into Learner Analytics	Legitimate purpose of analyzing student data to help make informed decisions which can lead to improved student satisfaction, retention and attainment
12	Production of statistical returns required by certain third-party professional bodies e.g. ACCA, CIMA, and others	Necessary for performance of a task in the public interest, namely research and analysis into professional qualifications access and performance.
13	Assessment and provision of support services to students, including the provision of disability support services and study support services.	Legitimate purpose of providing appropriate support to students based on their needs
14	To direct mail and marketing and events agencies who may assist StudySmart in the administration of mailing to enquirers, applicants, offer holders, students and past students and the booking of events. Examples of such agencies include MailChimp.	Processing is necessary for the legitimate purpose of communicating with students and offer holders about benefits, services, activities and events or consent to communicate such information to enquirers and applicants
15	To professional and industrial bodies (such as the ACCA, CIMA and others) wishing to communicate with students about career opportunities and membership of their body and also where relevant to confirm your qualifications and accredit your course	Consent of students or necessary for performance of a contract of study in circumstances where membership of professional body necessary condition of study
16	To external agents of StudySmart in relation to the repayment of student debts, where internal recovery attempts have proved unsuccessful	Legitimate purpose of recovering student debts
17	To organisations providing banking and online payment processing services such as Alpha Bank, Peiraious Bank and others	Legitimate purpose of engaging third parties to process and manage the StudySmart's financial transactions