



## Research Academy Privacy Policy

Research Academy Limited (“**We**”, “**Us**”, “**Our**”) is committed to protecting and respecting your privacy. For the purposes of the General Data Protection Regulations (GDPR) and any subsequent UK legislation covering data protection, we are the Data Controller.

This privacy policy (“**Policy**”) sets out why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used.

We may change this Policy from time to time. If we make any significant changes we will advertise this on our website or contact you directly with the information. Please check this page occasionally to make sure you are happy with any changes.

If you have any questions about this Policy or about your personal information, please contact us. You can reach us at [admin@research-academy.co.uk](mailto:admin@research-academy.co.uk) or +44 20 3130 1431.

### What type of personal information we collect

The type and amount of information we collect depends on why you are providing it. This is illustrated in the table below.

Reason you provide data	Data that we collect
To make an <b>enquiry</b> about us or our courses	<ul style="list-style-type: none"><li>• First name</li><li>• Last name</li><li>• What course(s) you are interested in</li><li>• Who will pay for the course(s)</li><li>• Employer (if you are making an enquiry about a course that will be paid for by an employer)</li><li>• Email address</li><li>• Phone number</li><li>• How you heard about us</li></ul>
To <b>apply for a course</b>	<ul style="list-style-type: none"><li>• First name</li><li>• Last name</li><li>• Preferred first name</li><li>• Name of course and course start date</li><li>• Preferred exam location</li><li>• Whether you require support with learning or during assessment, and if yes, what support and why</li></ul>

	<ul style="list-style-type: none"> <li>• Date of birth</li> <li>• Gender</li> <li>• Nationality</li> <li>• How many years of experience you have in social or market research</li> <li>• Verification that you meet our eligibility criteria. This will vary depending on the criterion you choose. Eligibility criteria are listed on the <a href="#">Admissions page</a> of our website.</li> <li>• Verification that you meet the English language requirements. These are listed on the <a href="#">Admissions page</a> of our website.</li> <li>• Whether you can take study leave and if yes, how many days</li> <li>• Billing address</li> <li>• Email address</li> <li>• Mobile phone number</li> <li>• Landline phone number</li> <li>• How you heard about us</li> </ul>
<p>To have an <b>employer</b> or other <b>third party</b> fund a course</p>	<ul style="list-style-type: none"> <li>• Legal corporate name of funding organisation</li> <li>• Name, email and phone number of the authorising manager</li> <li>• Name, email and phone number of the accounts payable contact</li> </ul>
<p>To <b>participate in our courses</b> via our online learning environment</p>	<p>We will use the following information from your application to create an account for you:</p> <ul style="list-style-type: none"> <li>• First name / preferred name</li> <li>• Last name</li> <li>• Email address</li> </ul> <p>You can <u>optionally</u> upload a photo and share other information with fellow students once your account is live.</p>
<p>To notify us of <b>exceptional circumstances</b> that may arise during a course</p>	<p>We do not routinely collect additional data once students begin their course. Exceptions to this are:</p> <ul style="list-style-type: none"> <li>• If you defer or withdraw from a course for medical reasons or due to a close family bereavement, we will ask you to provide documentary evidence.</li> <li>• If you request a reasonable adjustment of your assessment conditions, e.g. to how exams are administered, we will ask you to provide documentary evidence of the medical condition or disability that requires this adjustment.</li> <li>• If your employer has funded the course and your</li> </ul>

	<p>employment with them ceases, we will ask you to provide updated contact details.</p> <ul style="list-style-type: none"> <li>• If you cancel or withdraw from a course and are owed a refund, we will ask for your bank details.</li> </ul>
Upon <b>graduation</b>	<ul style="list-style-type: none"> <li>• An address at which you can receive a signed-for letter containing the hard copy of your certificate of graduation</li> </ul>
If you enquire about or order <b>research services</b> from us	<ul style="list-style-type: none"> <li>• First name</li> <li>• Last name</li> <li>• Job title</li> <li>• Company name</li> <li>• Company address</li> <li>• Email address</li> <li>• Phone number</li> <li>• How you heard about us</li> </ul>

If you are a job applicant, the information you are asked to provide is as set out in the application and necessary for the purposes of our considering the application.

## How we collect information

We may collect information from you whenever you contact us or have any involvement with us, for example when you:

- Visit our website
- Enquire about our courses or services
- Download a course prospectus
- Sign up to receive news about our courses
- Attend a meeting with us and provide us with information
- Participate in our courses and events
- Contact us in any way including online, email, phone, SMS, social media or post

## Where we collect information from

We collect information:

1. **When you give it to us directly:** you may provide your details when you ask us for information, apply for a course, attend our events, or contact us for any other reason.
2. **When you have given other organisations permission to share it:** your information may be provided to us by other organisations if you have given them your permission. This might be your employer, or a training management outsourcing company commissioned by your employer. The information we receive from such organisations depends on your contract with them.
3. **When you use our website:** information about you is recorded and stored when you use our website. See the information about the use of cookies under that heading below.

## How we use your information

We will use your personal information in a number of ways which reflect the legal basis applying to processing of your data. These may include:

- Providing you with the information or services you have asked for
- Sending you communications, with your consent, that may be of interest, including marketing information about our services and activities
- Processing course applications
- Carrying out our obligations under any contract between us, e.g. providing you with a course
- Seeking your views on our services or activities, so that we can make improvements
- Maintaining our organisational records and ensuring that we know how you prefer to be contacted
- Processing job applications

## Our legal basis for processing your information

The use of your information for the purposes set out above is lawful because one or more of the following applies:

- **On the basis of consent:** Where you have provided information to us for the purposes of requesting information or requesting that we carry out a service for you, we will proceed on the basis that you have given consent to us using the information for that purpose, based on the way that you provided the information to us. We will ask you whether you consent to being contacted for marketing or research purposes. You may withdraw consent at any time by emailing us at [admin@research-academy.co.uk](mailto:admin@research-academy.co.uk). This will not affect the lawfulness of processing of your information prior to your withdrawal of consent being received and actioned.
- **On the basis of legitimate interest:** where the purpose of our processing is the provision of information or services to you, we may also rely on the fact that it is necessary for our legitimate interests in relation to providing the information or service requested, and given that you have made the request, would presume that there is no prejudice to you in our fulfilling your request.
  - **Example 1:** You request information about a course and ask not to receive further marketing communications from us. It is in our legitimate interest to remind you that the course will start soon, in case you still want to apply for it. We will cease to contact you once the course in question begins.
  - **Example 2:** A third party, e.g. a prospective employer or an educational institution, asks us to verify whether or not you graduated from one of our courses. Unfortunately, unscrupulous individuals have in the past attempted to commit immigration fraud by claiming to be a Research Academy student or graduate. We have a legitimate interest in being able to confirm or deny whether someone was a student with us.

- **On the basis of contractual obligation:** It is necessary for us to hold and use your information so that we can carry out our obligations under the contract entered into with you (e.g. to deliver a course to you), or to take steps you ask us to prior to entering into a contract (e.g. to process your course application).

If you want to contact us about your marketing preferences, please get in touch at [admin@research-academy.co.uk](mailto:admin@research-academy.co.uk) or +44 20 3130 1431.

## How we keep your information safe

We understand the importance of keeping your personal information safe, and we take appropriate steps to safeguard it.

We appreciate that if you apply for or take a course with us, you may need to disclose sensitive personal information to us, e.g. medical records. To prevent the complexity inherent in a two-tier system, e.g. where some data is held on separate servers, we therefore operate to a high standard of security across the board.

The measures we take include:

- **Encryption to keep your data safe while it is in transit:** When you do things like send us an email, fill in an enquiry form or fill in a course application form, the data that you enter moves between your device and our software and/or server environment. We protect this data using encryption technology like HTTPS, Transport Layer Security and Secure FTP. This also applies when we share your data with third parties, as discussed in the next section.
- **Encryption and password-protection to keep your data safe while it is stored with us:** Once you give us your data, it is stored in leading cloud-based environments, on servers, and in software running on our computers. These computers are password-protected. Where your data is stored in the cloud or on a server, our contracts with these service providers contain terms that confirm your data is managed in accordance with principles of GDPR. We carefully conduct due diligence on all of our vendors.
- **Enforcement of strong password rules:** We use strong passwords and a password management environment to keep our online and cloud-based environments secure. We also enforce a strong-password rule on our students, by providing each student with a unique, randomly generated, strong password that they are not able to change. This prevents system users from using easily-guessed or easily hacked passwords.
- **Security reviews:** We carry out reviews of the technology platforms we use, and of the associated vendors, to ensure they are implementing the latest security measures on our behalf. When a vendor does not meet these requirements, we replace them. We also perform penetration testing on servers that host our online learning environment.
- **Regular infrastructure updates:** We keep our IT infrastructure up to date to ensure that security measures keep up with evolving threats. This includes upgrades to our online learning environment and the server it is hosted on, and updates to operating

systems and software packages. Because much of our infrastructure is provided by leading cloud-based providers, many of these upgrades and updates are automated, reducing the scope for human error or forgetfulness.

We ensure that only authorised persons have access to your information, and that everyone who has access is appropriately trained to manage your information. This means that only our employees and contractors have access to your information, except as noted in the next section.

No data transmission over the internet can be guaranteed to be completely secure. So whilst we strive to safeguard your information, we cannot guarantee the security of any information you provide online, and you do this at your own risk. This applies particularly to email transmissions: although we apply encryption at our end, if your email service does not support encryption, you may inadvertently send or receive unencrypted data.

## Who has access to your information?

The following third parties may have access to your information.

- The Market Research Society (MRS). If you are a student taking a course that is accredited by the MRS, we will share your personal data with them for the purposes of conducting examinations and assessments, the management of exceptional circumstances that may impact your assessment, and the publication of examination results and certificates. In turn, the MRS will share your personal data with us, including examination results and outcomes of any reviews of marking, reviews of moderation, and appeals. **Of specific note is that the MRS will publish the names of candidates who are awarded an MRS qualification. The full name (first name, surname) of each successful candidate awarded an MRS qualification in the calendar year will be published in Impact Magazine (print and digital) and displayed at the MRS Awards Dinner (print). If you object to processing on this basis please email [profdevelopment@mrs.org.uk](mailto:profdevelopment@mrs.org.uk) to opt out.**
- Third parties that have funded the cost of your course, e.g. your employer or bursary providers such as MRBA Skills. We will share data about your progress on the course, and the grades you achieve. Employers may in turn share data with us about your employment status and workload.
- Third parties that ask us to verify whether or not you graduated from one of our courses. This is likely to be prospective employer of yours or an educational institution at which you want to pursue studies, and we assume it is in your interest for us to verify your attendance of and/or graduation from our courses.
- Third parties that provide services to us. We make use of cloud-based data storage, accounting, database, and email solutions, as well as cloud-based virtual learning environment environments. We employ carefully selected IT specialists to maintain our websites. We provide these third parties with the information that is necessary to

provide the service and we have an agreement in place that requires them to operate with the same care over data protection as we do.

- Third parties if we run an event in conjunction with them. We will let you know how your data is used when you register for any event
- Analytics and search engine providers that help us to improve our website and its use.
- Third parties in connection with a restructuring or reorganisation of our operations, for example if we were to merge with another business. In such an event, we will take steps to ensure that your data will be protected by the third party.

Owing to matters such as financial or technical considerations, the information you provide to us may be transferred to countries outside the European Economic Area (EEA), which are not subject to the same data protection regulations as apply in the UK. For instance, some of the data is stored on servers outside the EEA, and some of our suppliers are based outside the EEA. We meet our obligations under GDPR by ensuring that the information has equivalent protection as if it were being held within the EEA. We do this by ensuring that any third parties processing your data outside the EEA either benefits from an adequacy determination for GDPR purposes and/or, where appropriate, we have entered into a data processing agreement which contains model EU clauses.

We may also disclose your personal information if we are required to do so under any legal obligation. As noted previously, we may use external data for the purposes of fraud prevention and credit risk reduction, or where doing so would not infringe your rights, but is necessary and in the public interest.

Other than this, we will not share your information with other organisations without your consent.

## **How long we keep your information for**

We will hold your personal information for as long as it is necessary for the relevant activity.

- Where we rely on your consent to contact you for marketing purposes, we will treat your consent as lasting only for as long as it is reasonable to do so. This will usually be for two (2) years. We may periodically ask you to renew your consent.
- If you have applied for or taken a course with us, we will retain your data indefinitely so that we can prove whether or not you attended or graduated.

If you ask us to stop contacting you with marketing materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

If you ask us to delete data related to your studies with us, such as coursework papers and attendance records, we will do so. However, we will keep a record of your contact details and of limited information needed to uniquely identify you as a student and/or graduate.

## Keeping your information up to date

Please let us know if your contact details change. You can do so by contacting us at [admin@research-academy.co.uk](mailto:admin@research-academy.co.uk) or +44 20 3130 1431.

## Use of aggregated data

Where data can be aggregated and anonymised, we may use this for research purposes without restriction. For example, we may monitor customer traffic patterns, website and Services usage and related information in order to optimise users' usage of the Site and Services and we may give aggregated statistics to a reputable third-party. We are entitled to do this because the resulting data will not personal identify you and will therefore no longer constitute personal data for the purposes of data protection laws.

## Cookies

In addition to the information which you supply to us, information and data may be automatically collected through the use of cookies. Cookies are small text files employed on our websites to recognise repeat users and allow us to observe behaviour and compile aggregate data in order to improve the websites for you. For example, cookies will tell us whether you viewed our websites with sound or with text on your last visit. Cookies also allow us to count the number of unique and return visitors to our websites.

Cookies may be either "persistent" cookies or "session" cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

The law states that we can store cookies on your machine if they are essential to the operation of the website, but that for all others we need your permission to do so.

If you **visit our main website**, [www.research-academy.co.uk](http://www.research-academy.co.uk), it will set the following cookies:

Name	Purpose	Optional/mandatory
catAccCookies	This cookie is set if you consent to the use of cookies. If you allow it, you won't be reminded to accept cookies each time you visit the site.	<b>Optional:</b> provides optional functionality

## Opting out of cookies

If you do not wish to receive cookies from us or any other website, you should be able to turn cookies off on your web browser. Please follow your browser provider's instruction in order to do so. Unfortunately, we cannot accept liability for any malfunctioning of your PC or its installed web browser as a result of any attempt to turn off cookies, nor for any resulting malfunction of our websites.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [aboutcookies.org](http://aboutcookies.org) or [allaboutcookies.org](http://allaboutcookies.org).

## Your rights

You have the right to request details of the processing activities that we carry out with your personal information by making a subject access request. Such requests have to be made in writing. For more details about how to make a request, and the procedure to be followed, please read our Data Protection Policy, available at <https://research-academy.co.uk/privacy-policy-and-cookies/>. To make a request, please contact us at [admin@research-academy.co.uk](mailto:admin@research-academy.co.uk).

You also have the following rights:

- The right to request rectification of information that is inaccurate or out of date.
- The right to erasure of your information (known as the "right to be forgotten"). The right to restrict the way in which we are dealing with and using your information
- The right to request that your information be provided to you in a format that is secure and suitable for re-use (known as the "right to portability")
- Rights in relation to automated decision making and profiling including profiling for marketing purposes.

All of these rights are subject to certain safeguards and limits or exemptions, further details of which can be found in our Data Protection Policy. To exercise any of these rights, you should contact the Managing Director of the Research Academy at the above address.

If you are not happy with the way in which we have processed or dealt with your information, you can complain to the Information Commissioner's Office. Further details about how to complain can be found [here](#).

## Research with our customers

We always aim to improve the services we offer. As a result, we occasionally contact our customers for research purposes. We will only contact you if you have consented to this. Participation in research is voluntary, and you are under no obligation to reply to any research request that you might receive from us. Should you choose to do so, we will treat the information you provide with the same high standard of care as all of our other customer information.

## Changes to this Policy

This Policy may be changed from time to time. If we make any significant changes, we will advertise this on our website or contact you directly with the information. We recommend that you read this Privacy Policy each time you consider giving your personal information to us.

**Last updated:** November 2019