Kaplan Higher Education UK Privacy Notice

1. Introduction

Kaplan Higher Education UK (KHE UK) cares about your privacy and keeping your personal information safe. This notice explains what information we collect about Students and Sponsors, how we use it and who we might share it with, and how these individuals can exercise their privacy rights. It is important that you read this Privacy Notice so that you understand how and why we are using your personal information.

2. Key Terms

Throughout this Privacy Notice we use some essential terms, which are defined below:

Student – a prospective, enrolled or former student on KHE UK programmes.

Our courses are not available to anyone under the age of 18. If you want to request information, download a prospectus, apply or enrol on one of our courses or contact us, you must ask your Parent or Guardian for permission.

Sponsor - an individual, a government body or corporate organisation that is approved by Kaplan to contribute towards a student's tuition fees.

Agent - a third party individual or organisation engaged by Kaplan to promote our and our partners' programmes and assist prospective Students with their application and enrolment process. Agents advise Students on suitable study options, prepare and submit applications, or liaise with institutions on behalf of the Student.

Programmes - programmes and courses delivered by Kaplan Higher Education UK.

3. Who We Are

We are **Kaplan Higher Education UK**. We are a higher education provider that delivers online degree programmes in partnership with universities. We decide what personal information we need for the services we provide and how it is used. We are responsible for this information.

Kaplan Higher Education UK is a data controller. This means we decide what to do with the personal information we collect about you, like your name, contact information and anything else that identifies you. The law says we must explain clearly how we use and protect this information. This is what this Privacy Notice is for – to let you know what happens to your personal information when you give it to us, either directly or through someone else.

Kaplan Higher Education UK Ltd is made up of different legal entities, which are listed at the end of this Privacy Notice. This Privacy Notice is issued on behalf of the Kaplan Higher Education UK group, so when we mention "Kaplan", "we", "us" or "our" in this Privacy Notice, we are referring to the relevant company in the Kaplan Higher Education UK group responsible for processing your information.

4. Who to contact about your personal information (Data Protection Officer)

You can contact our Data Protection Officer (DPO) if you have questions about how we use your information. Our DPO makes sure we look after your information properly.

Our Data Protection Officer (DPO) is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this Privacy Notice, including any requests to exercise your rights, please contact the DPO using the details set out below:

Email address: dpo@kaplaninternational.com
Postal address: Palace House, 3 Cathedral St, London SE1 9DE, England, UK.

If you are resident in an EU country and wish to contact our EU Representative:

Kaplan Ireland Education Limited, 6th Floor, South Bank House, Barrow Street, Dublin 4, Ireland.

If you are resident in China and wish to contact our China Representative:
Shanghai Kaibo Management Consultation Co., Ltd. 902A, Chong Hing Finance Center, No.288 Nanjing West Road, Huangpu District, Shanghai, China. (上海楷博管理咨询有限公司，地址：中国上海市黄埔区南京西路288号创兴金融中心902A)

You have the right to make a complaint at any time. In the first instance, the complaint should be directed to us. We will respond within 30 days of receipt. If you are not satisfied with our response, you are free to raise any concern with the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

5. What is personal information?

Personal information is anything that can identify you. This can include your name, address, phone number, your passport number and other details about you.

Personal information does not include data where information which could identify you has been removed (anonymised data).

Special Category/Sensitive Personal Information

Some personal information is more sensitive - like details about health, ethnic background, religion, sexual orientation or criminal convictions. This is called special category or sensitive personal information, and we only use it where absolutely necessary and with stronger protections in place. Where we need to process special category personal information, in this Privacy Notice we will mark this with an asterisk (*) so it is clear to you when we process this type of information.

6. Our rules for using your personal information (Data protection principles)

We follow strict rules when using your personal information. We promise to use it fairly and legally, always inform you how we use it, only collect what we need, keep it up to date, not keep it longer than we need to, and keep it safe.

We will comply with data protection laws. These say that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

7. How we use the personal information we collect

We use personal information to deliver online higher education programmes to Students and by maintaining contact with our alumni, to offer updates about opportunities that may be of interest to them. We may also use personal information to ensure Students stay safe.

We use personal information when we need to follow the law.

We also may need some information that helps our business, as long as using it will not harm your rights or freedoms.

For these purposes we may also need to use the personal information of the Students' Sponsors (see more in the section "If you are a Sponsor of a Student").

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform a contract we have entered into with the Student
- Where we need to comply with a legal obligation

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be less common:

- Where we may need to protect a Student's health, safety and wellbeing (or the health, safety and wellbeing of another person)
- Where it is needed in the public interest.

Generally, we do not rely on consent as a legal basis for processing your personal information, other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

8. What information we collect and why

We collect different types of information for different reasons. For example, to answer your questions and help you find the right course information, to process a potential Student's application and support them in their studies, to look after a Student's health, safety and wellbeing, to send useful updates, to meet our legal responsibilities, to improve how we support Students, including using technology like AI. We may collect various information during a Student's studies but will always make sure this does not affect their rights and freedoms.

Special Category/Sensitive Personal Information

From time to time we may need to process special category data. The legal basis for using this information is explicit consent of the individual, where we are required to do so by law or where it is in the Student's or another party's vital interest.

If you are a Student:

- **Applications**

If you make an application to study on one of our Kaplan Higher Education UK Programmes, we may collect the following categories of personal information about you

and your Sponsor (see what information we process about them in section *If you are a Sponsor of a Student*):

- Name, title, addresses, telephone numbers, personal email addresses
- Date of birth
- Gender
- Nationality and country of residence
- Passport number
- Education history
- Academic and any other qualifications you have
- Level of English language
- Employment history
- Information on how you will fund your studies with us
- Information about the subjects you are interested in studying and the university you wish to study in
- Information about any criminal convictions*
- Information to ensure that we do not engage in transactions or relationships prohibited under applicable laws or regulations
- Information about your health and any disabilities that you may need support with*.

* Special Category/Sensitive Personal Information

Please note, depending on the course you apply for, we may need you to provide further information.

Other than the special category information, the legal basis for using this information is to enter into and fulfil the contract we have for your studies or to comply with our legal obligations.

If you use an Agent to arrange your application, we may collect the categories of personal information described above from your Agent.

- **Safety and Wellbeing**

To look after your safety and wellbeing, we will ask for emergency contacts. This will usually be a person whose details you have provided to us for this purpose.

The personal information we will collect about them is:
- Name
- Telephone number
- Address
- Email address
- Relationship to you

Our legal basis to process this information is your consent.

- **Equal Opportunities & Inclusivity**

To comply with our legal obligations under discrimination and inclusivity laws, and only if you are happy to provide this information, we will ask you about your background.

The information you will be asked to provide includes:
- Gender
- Gender identity*
- Information about your health and any disabilities that you may need support with*
- Ethnicity*
- Religion/belief*
- Sexual orientation*
- Whether you grew up in foster care*
- The level of your Parent's/Legal Guardian's education

* Special Category/Sensitive Personal Information

This information is treated with strict confidence. If you provide this information, it will be processed and shared to comply with our reporting and registration requirements with the Office for Students (OfS), the independent regulators of higher education in England, and Higher Education Statistics Agency (HESA).

The legal basis to process this information will be your explicit consent.

- **Studying on a Kaplan Higher Education UK Programme**

If you are studying on a Kaplan Higher Education UK Programme, during your studies, we will collect information:

- About your academic experience
- Attendance
- Assessment files, grades, tutor feedback, timestamps
- Progression
- Payments made to us
- To investigate any allegations of academic misconduct

The legal basis for processing this information is to fulfil our contract with you, but it is also in our legitimate interest to use this personal information in order to monitor the provision of our services.

We may also collect personal information about your health and any disabilities you may have in order to make appropriate arrangements and reasonable adjustments to help you study. We will only process this information with your explicit consent.

- **Examinations**

If you take an online exam, we may use a third party service provider to conduct the exam, which may involve the exam being proctored, which is where a person or an AI tool monitors the exam to ensure no academic misconduct takes place.

We collect some information to help run the test safely and fairly. This might include your:
- Name
- Student number
- The time you arrive
- Your ID
- Notes from the invigilator (exam supervisor) about anything important that happens during the exam.
- A photo of you with your ID to verify your identity
- A video and sound recording of you and your surroundings before and while you take the exam
- Information about your computer, internet browser and IP address. We may also require you to download and use a secure browser for the exam.

The legal basis for processing this information is to fulfil our contract with you, but it is also in our legitimate interests to use this personal information in order to monitor the provision of our services.

If you take an online exam, we will provide you with further details about the processing of your personal information before you sit the exam.

- **Enquiries and Marketing**

If you enquire about the services we offer, complete a form, download a prospectus, enter a competition, promotion or survey, participate in discussion boards or other social media functions on our websites, we may use your:

- Name
- Email
- Telephone number
- Where you live
- Nationality
- Age
- Whether you are under 18
- Your query
- What you are interested in studying and where
- How you have engaged with our website or our events and other interactions with us.

This helps us understand what courses we can offer you and to provide you information about similar services and to prioritise queries. It may be necessary to process additional personal information about you, depending on your enquiry.

The legal basis to process this information is your consent, where you have provided your consent in your enquiry.

If you have applied to study with Kaplan, are a current Student or one of our alumni, we may use your personal information to inform you of special offers and new or existing services that we believe may be of interest to you or to send you surveys or questionnaires so that we can learn more about your needs and interests and improve our services.

The legal basis to process your information is our legitimate interest.

You will always be provided with the option to opt out of such communications, if you no longer wish to receive them.

- **Internal business purposes**

We may also use the personal information listed above for our internal business purposes. This is in our legitimate interests in order to operate as a business and monitor and improve the services we provide. Where possible, we will anonymise this information.

- **Use of our website and learning platform**

As you interact with our website and learning platform, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal information by using cookies and other similar technologies.

Please see our KHE UK Cookie Policy on our website for further details.

- **Artificial Intelligence (AI)**

To enhance the student support and services we offer, improve operational efficiency, and support the delivery and development of our products and services, we may deploy AI tools which process some of your information.

For example, we may use AI tools to summarise questions we receive from you, answer FAQs, capture information about you and your query before submitting it to a staff member, provide instant feedback on answers to queries, support administrative or operational processes, personalise aspects of our services, or otherwise assist in delivering and improving our products and services. These features may supplement the existing support and services we provide and help us improve the overall experience and efficiency of our operations.

Where AI is utilised, Kaplan will ensure that your privacy rights and the security of your data are robustly protected as follows:

- We will always inform you where you are engaging with an AI tool such as a chatbot or virtual assistant
- In most cases the AI features we use will not be trained with your data
- In limited circumstances, and where there is no adverse effect on you, the AI models may be trained on your data. This will be done in order to enable specific features of

the tool or to teach the model how to triage different types of queries. However, in most of these cases, your personal information will only be used by us and will not be shared with or used by the supplier of the AI tool. If this is not the case, we will inform you and give you the option to opt out of the sharing
- In some cases, aggregated data may be used to train a supplier's AI model. In this case, all personal information will be anonymised in advance, which means that it will no longer be possible for anyone to identify you.

Where we use AI for other purposes, we will provide you a separate notice about how the AI tool is used and what personal information is processed.

- **Financial Crime and Sanctions Screening**

We carry out necessary and targeted financial crime and sanctions screening on Students and Sponsors located in or nationals of high-risk jurisdictions. This activity includes screening these individuals against publicly available information published by a number of governments and regulatory bodies globally, to ensure compliance with laws and regulation in the UK.

Our legal basis to process this information is to ensure that we comply with our legal obligations.

If you are a Sponsor of a Student

We may process the following personal information where it is necessary to support a Student's application, study, wellbeing or accommodation.

- **Student Application**

We may need to process the personal information of a Student's Sponsor to facilitate the Student's application. This includes:
- Name, title, addresses, telephone numbers and personal email addresses
- Date of birth
- Gender
- Nationality and country of residence
- Passport number
- Payment information

- Relationship with the Student
- Information to ensure that we do not engage in transactions or relationships prohibited under applicable laws or regulations.

The legal basis for using this information is to enter into and fulfil the contract we have with the Student or to comply with our legal obligations.

Emergency contacts

If you are named as an emergency contact for a Student, we will collect personal information about you to ensure we are able to contact you if necessary. This includes:

- Name
- Telephone number
- Address
- Email address
- Relationship to the Student.

Our legal basis to process this information is to satisfy our legal obligations to ensure the health and wellbeing of the Student is protected.

If you fail to provide personal information

Where we need to collect personal information for a Student's application, studies or accommodation, and you fail to provide that information when requested, we may not be able to provide the services to the Student.

Where we need to collect personal information to fulfil our legal obligations, we may be required to inform the government body responsible that the requested information has not been provided.

9. Who we share your personal information with

To provide the services we offer, it is sometimes necessary to share the personal information we process with third parties. We only do this where it is necessary.

This could include our third-party service providers, our business partners, including our partner universities, government authorities, other Kaplan companies and other third parties.

We may also share Student information with Sponsors or Agents.

This sharing will take place where we are required to do so by law, where it is necessary to perform our contract with the Student or where we have a legitimate interest in doing so.
We only do this where we have ensured the organisation we are sharing your information with will keep it as safe and secure and will comply with any relevant data protection laws.

The third parties we may share your personal information with include:

- **Our service providers**

We may share your personal information with other companies that perform certain services. These services may include processing payments, providing customer service and marketing assistance, performing business and recruitment analysis, supporting our website and IT functionality, and providing or supporting learning platforms, educational technologies, or learning content and related services. These service providers will be supplied with or have access to your personal information solely for the purpose of providing these services to us or on our behalf.

When required, if there is outstanding money owed to us by a Student or Sponsor, we may also share personal information with our debt recovery service providers. We share this information as it is in our legitimate interest to recover any monies owed to us.

In most circumstances the third party which provides the services on our behalf will be a data processor and we will remain accountable for the protection of your personal information.

In some circumstances, the third party which provides the services will be an independent data controller. In these cases, the third party will provide you with information on how they process your personal information.

- **Our business partners**

We may share Student's personal information with our university partners with whom the Student is interested in applying to or is studying.

- **Sponsors**

We may also share Student's personal information with their Sponsor with whom we have an agreement or arrangement relating to the Student's programme of study.

- **Parents/Legal Guardians**

We may share a Student's personal information with the person the Student has named as their emergency contact in order to comply with our duty to keep our Students safe.

We may share information about a Student with their Parents/Legal Guardians to protect the Student's vital interests.

- **Agents**

If a Student uses an agent to arrange their application, we may share the Student's personal information with them.

- **Government Authorities and Regulators**

We may need to share the personal information of a Student or their Sponsor, where necessary to ensure that we comply with all applicable laws and regulations. This includes, but may not be limited to:

- Responding to lawful requests from regulatory bodies, government authorities or law enforcement agencies
- Fulfilling statutory or regulatory reporting requirements
- Carrying out checks to ensure that we do not engage in transactions or relationships prohibited under applicable laws or regulations
- Disclosing information regarding any criminal convictions*, where required.

- **Other entities in the Kaplan group**

We may share the personal information we process with other entities in our group to aid and support the admissions process, promote to you other programmes offered by KHE UK companies that you may be interested in, fulfil our contract with the Student, support our business needs, as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise or for system maintenance support and hosting of data. We will only do this where it does not affect your rights and freedoms.

- **Others**

We may share the personal information we process with other third parties, such as in the context of the possible sale of our business. We may also need to share your personal information in order to pursue available remedies or limit damages we may sustain.

10. Sending your personal information to other countries

Sometimes we need to send the personal information we process to other countries, but we make sure it is still protected. Even if a country's privacy rules are different, we take steps to keep your personal information safe.

As we are an international business with employees, entities and service providers all over the world, we may need to transfer the personal information we process to other countries which may be outside the European Economic Area (EEA).

We may disclose the personal information we process to recipients located outside your home country, including universities or other education institutions, and regulatory authorities. Such disclosures will occur where necessary for verification purposes. The specific location of these recipients will depend on the institutions to which you apply or where verification is required.

When we transfer personal information outside the EEA, we will ensure we comply with both data protection laws in the EEA and, where appropriate, the data protection laws in the country we are transferring the information to. Where the data protection laws in such countries may not be as comprehensive and provide the same level of protection for your personal information as those within the EEA, we will take appropriate steps to

ensure that the personal information is protected. These steps will include contractual mechanisms with the organisations we share the information with, to ensure they provide an appropriate level of protection. Please contact us using the contact details in this Privacy Notice if you would like more information.

11. How we keep your personal information safe

We take care to keep the personal information we process safe and protected from any loss, theft or misuse. We make sure only the right people can see or use your information. If something goes wrong, we will tell you if you need to take action.

We have put in place appropriate security measures to prevent the personal information we process from being accidentally lost, used or accessed in an unauthorised way, altered or wrongfully disclosed. In addition, we limit access to the personal information we process to only those employees, service providers, business partners, agents and other third parties who need to access it to provide the services we offer. They will only process personal information on our instructions or as otherwise agreed, and they will always keep the information secure.

We have put in place procedures to deal with any suspected data security incident and will notify you if the incident may affect you significantly. We will also inform any relevant regulator, where we are required to do so.

12. Keeping your personal information up to date

It is important that the personal information we hold about you is accurate and up to date. If at any time the information we hold on you changes, please inform us as soon as possible so we can update our records. This ensures we can continue providing the Student with our services and that the right information reaches the right person.

If you are a Student and there is a change to your personal information, please contact Student Support.

If you are not an enrolled Student and there is a change to your personal information, please contact the Admissions team.

13. How long we keep your personal information

We will keep the personal information we process for as long as it is necessary for us to provide Students our services, to meet our business needs or to meet our regulatory and legal duties. We will delete or anonymise the personal information when it is no longer necessary to keep it.

We will only retain personal information for as long as necessary to fulfil the purposes we collected it for, including for our business needs and for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of the information, the purposes for which we process the information and whether we can achieve those purposes through other means. We may also be required to keep personal information for a specific period to satisfy any applicable legal requirements. Please contact us using the contact details in this Privacy Notice if you would like more information.

In some circumstances we may anonymise the personal information and use the anonymised information for statistical purposes or to improve our services. When we anonymise personal information for these purposes, we will take every reasonable measure to ensure it cannot be linked back to an individual.

14. Your rights

You have rights over your personal information. These include the right to:

- Understand how we use your information
- See what information we hold about you
- Ask us to correct inaccurate information
- Ask us to delete your information (in some cases)
- Tell us not to use your information (in some cases)
- Ask for your information to be sent to someone else
- Make a complaint if you're unhappy with the way we have handled your personal information.

We are always happy to help you exercise these rights. If you would like to do so, please use this link [here].

The data protection laws give you the following rights:

- **Right to be informed**

You have the right to be informed about how we collect and use your personal information. We do this by providing you the information in this Privacy Notice. You are also free to contact us using the contact details provided in this Privacy Notice.

- **Request access to your personal information**

This is also known as a "subject access request". This right allows you to request a copy of the personal information we hold about you and to check that we are lawfully processing it.

- **Request correction of the personal information we hold about you**

This right allows you to request that any incomplete or inaccurate information we hold about you is updated, although we may need to verify the accuracy of the new personal information that you provide to us.

- **Request erasure of your personal information**

This right allows you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. Please note, however, that we may not always be able to comply with your request for erasure where there is an overriding reason to keep it - for example, where we have a legitimate interest in retaining it or where we are required by law to keep it.

- **Object to processing of your personal information**

Where we rely on legitimate interest, you have the right to object to the processing. Please note, however, that we may not always be able to comply with your request, if we have an overriding reason to continue to process the information. Where we are

processing your personal information for direct marketing purposes, we will always comply with your request.

- **Request the restriction of processing of your personal information**

This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer of your personal information to another party**

You have the right to request that we transfer your personal information to another supplier.

- **Right to make a complaint**

You have the right to submit a formal complaint directly to us if you are unhappy with how your personal information has been handled.

- **No fee usually required**

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

- **What we may need from you**

We may request information from you to help us confirm your identity to ensure we do not disclose your information to a third party.

Where you submit a request, please give us as much relevant detail as you can about what you need, to help us provide all relevant information as quickly as possible.

- **Your right to withdraw consent**

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw that consent. To withdraw your consent, please contact us using the contact

details in this Privacy Notice. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

15. Changes to this Privacy Notice

We may update this Notice and we will let you know if we have made any big changes.

We reserve the right to update this Privacy Notice at any time and we will take reasonable steps to provide you with the updated Privacy Notice when we make any substantial changes. We may also notify you in other ways from time to time about the processing of your personal information.

16. Our companies

Please see below the full list of companies within Kaplan Higher Education UK covered under this Privacy Notice.

Name of organisation	Registration Number, Registered Office
Kaplan Higher Education UK Limited	Company number 06245017 Palace House, 3 Cathedral St, London SE1 9DE, England
Kaplan Higher Education UK (Essex) Limited	Company number 16885419 Palace House, 3 Cathedral St, London SE1 9DE, England
Kaplan Higher Education UK (Liverpool) Limited	Company number: 11979168 Palace House, 3 Cathedral St, London SE1 9DE, England

Nicola Pittman	Managing Director	August 2026	KHE UK Cookie Policy
Carol Dadd	Director of Quality & Compliance		