



Student Privacy Notice (HE)

2026/27

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Owner	Quality and Standards Committee
Approving body	Board of Directors
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See Appendix A for version history

Student Privacy Notice (HE)

Purpose of this privacy notice

This privacy notice explains how Boomsatsuma Education Ltd ('Boomsatsuma') collects, uses and shares personal data about students on higher education programmes delivered by Boomsatsuma.

'Personal data' means information that can identify you. This includes information such as your name, contact details, local student record, attendance, engagement, assessment information, support needs, finance-related information and communications with us.

This notice applies once you are studying on a higher education programme delivered by Boomsatsuma, including where Boomsatsuma holds local student records and provides teaching, learning, support and local administration. Before this stage, your personal data will be used in line with the Admissions Privacy Notice (HE) [\[Link\]](#).

Boomsatsuma's higher education programmes are awarded by Kingston University London. Students are officially enrolled and registered by Kingston University and are Kingston University students. Kingston University's 'Privacy notice for enrolled students' [\[Link\]](#) explains how the University uses personal data for its own purposes, including official enrolment, student registration, student finance administration, statutory data returns, academic regulations, progression and awards.

Why we process your personal data

Boomsatsuma collects and uses your personal data to support the delivery and administration of higher education programmes. This includes teaching, learning, assessment, academic support, student support, local administration, communications, quality assurance and the day-to-day management of your studies.

Boomsatsuma is the data controller for the personal data it uses for its own local student administration, teaching, support and operational activities. Kingston University London is separately responsible for the personal data it processes for official enrolment, student registration, student finance administration, statutory data returns, academic regulations, progression and awards.

For the personal data Boomsatsuma controls, this means we decide how and why your personal data is used for those purposes. In that capacity, we are committed to protecting the privacy and security of your personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other relevant data protection legislation.

How we use your personal data

We use your personal data to support your studies with Boomsatsuma, maintain local student records, deliver teaching and learning, manage timetables and communications, provide access to systems and learning resources, monitor attendance and engagement, assess your work, record marks and feedback, and support Kingston University's progression and award processes.

We may also use your personal data to provide student support, make reasonable adjustments, consider additional learning support, manage wellbeing or safeguarding concerns, record absence, process extension requests and mitigating circumstances claims, and support your health, safety and welfare.

We may use your personal data to manage local student administration and to support processes relating to study breaks, withdrawal, transfer, complaints, appeals, conduct, disciplinary matters, refunds, compensation or legal claims, where Boomsatsuma is responsible for, or involved in, those matters.

We may share relevant information with Kingston University where this is needed for official enrolment, student registration, student finance administration, academic regulations, assessment, progression, awards, quality assurance, statutory data returns or other Kingston University requirements.

We may use attendance, engagement and progression information to identify where support may be needed. We do not make decisions about your study using solely automated decision-making.

What personal data we collect and record

The personal data we collect and keep on record may include:

- Your name, date of birth, address, email, phone number and other contact details
- Admissions and local enrolment information, including information from UCAS and your application
- Your programme, mode of study, year or level of study, timetable, attendance and engagement
- Your qualifications, assessment submissions, marks, feedback, progression information, outcomes and information needed to support Kingston University award processes
- Records of communications, absences, study breaks, withdrawal or transfer
- Information about disability, learning differences, health conditions, mental health, wellbeing, support needs or reasonable adjustments
- Information related to access and participation and equality, diversity and inclusion, such as age, sex, ethnicity, disability, religion or belief, sexual orientation, gender identity, care experience and other contextual information
- Information about complaints, appeals, extensions and mitigating circumstances, conduct, disciplinary or safeguarding matters
- Finance, funding, fee status, payment or debt information where this relates to Boomsatsuma's role or support you have asked us to provide
- Accident, health and safety or incident records where these relate to you
- Emergency contact and nominated contact information
- Information about placements, projects, professional activity or external opportunities, where these form part of your programme

- Photographs, audio or video where these are part of teaching, assessment, events, online sessions, safety and security arrangements, or publicity where lawful, including where you have agreed to this
- IT, systems and access information, such as user accounts, system logs, email records or use of Boomsatsuma systems
- Records of emails, calls, feedback, meetings or other communications with you.

We only collect information that is relevant to your student record held by Boomsatsuma, studies, support, safety, legal requirements or the management of Boomsatsuma's higher education provision.

Where we get your personal data from

We may receive personal data from you, UCAS, information provided by you during or following local enrolment, schools, colleges, previous education providers, qualification awarding bodies, and Boomsatsuma staff involved in teaching, assessment, support, administration or governance.

We may also receive information from parents, guardians, emergency contacts, nominated contacts, representatives, other students, placement or project providers, support services, medical professionals, safeguarding bodies, police, local authorities or other statutory bodies where this is necessary and lawful.

Data that needs extra protection

Some personal data needs extra protection under data protection law. This includes information about health, disability, ethnicity, religion, sexual orientation and criminal convictions.

We may use this information where it is needed to support your studies, make reasonable adjustments, provide student support, respond to wellbeing or safeguarding concerns, meet equality responsibilities, monitor fairness, manage

complaints or conduct matters, meet legal or regulatory requirements, or protect the safety of students, staff and others.

Where we use sensitive personal data or criminal conviction information, we will only do so where data protection law allows it and where any additional legal condition is met.

Access to this information is limited to staff on a need-to-know basis.

Who we share your personal data with

We only share your personal data where this is necessary and lawful. We may share relevant information with:

- Boomsatsuma staff involved in teaching, assessment, student support, wellbeing, safeguarding, local administration, local enrolment support, IT, quality assurance, governance, complaints, appeals or conduct matters
- Kingston University, where this is needed for official enrolment, student registration, student finance administration, academic regulations, assessment, progression, awards, quality assurance, statutory data returns or other Kingston University requirements
- UCAS, where this is needed in relation to your application or admissions record
- Student finance, funding, bursary or sponsorship bodies, where you have asked Boomsatsuma to support you with a query, where Boomsatsuma is required to provide local information, or where this is otherwise necessary and lawful
- IT, learning platform, records, assessment, communication or student management system providers that process personal data on our behalf
- Placement, project, employer or external partner organisations, where this is needed for your programme or an opportunity you take part in
- Nominated contacts, representatives, emergency contacts, parents, guardians or support services, where you have asked us to involve them or where this is otherwise necessary and lawful

- Medical professionals, safeguarding bodies, local authorities, police, courts or other statutory bodies where this is necessary to protect safety, meet a legal requirement, prevent or detect crime, respond to an emergency, or deal with a serious concern
- Legal advisers, insurers, auditors, debt recovery agents or professional advisers, where this relates to sums owed to Boomsatsuma or is otherwise necessary and lawful
- If you take part in group teaching, group work, online sessions, events, performances, screenings, exhibitions or other collaborative activity, other students, staff or attendees may see your name, image, work or contribution as part of that activity.

We do not sell your personal data.

HESA Student Record and related data returns

Kingston University is responsible for submitting student data to HESA and other relevant statutory, regulatory or funding bodies where this is required for students officially enrolled and registered with Kingston University.

Kingston University's 'Privacy notice for enrolled students' [\[Link\]](#) explains how the University uses student data for statutory data returns and related purposes.

The HESA Student Collection Notice is available via the HESA website [\[Link\]](#). The HESA Student Collection Notice explains how information submitted through HESA data collections is used after it has been submitted.

Our lawful basis for using your personal data

We only use your personal data where data protection law allows us to.

In most cases, we use your personal data where this is necessary for Boomsatsuma's legitimate interests in delivering and improving higher education provision. This includes teaching, assessment, academic support, student support

and wellbeing, local student administration, communications, local student records, access to systems, progression support, support for completion and award arrangements, protecting academic standards, keeping accurate local records, preventing fraud, protecting systems and premises, managing complaints or appeals, dealing with legal claims, and protecting the safety and wellbeing of students, staff and others.

We may also use your personal data where this is needed to meet legal obligations that apply to Boomsatsuma, including equality, safeguarding, health and safety, consumer protection, data protection and audit requirements. We may also process relevant information to support Kingston University with official enrolment, right to study checks or regulatory requirements where this is necessary and lawful.

In rare cases, we may use personal data to protect someone's life or safety in an emergency.

Where we rely on consent for a specific use of your personal data, we will make this clear. Where consent is the basis we are relying on, you can notify us of your wish to withdraw consent by contacting dataprotection@boomsatsuma.com.

International transfers

Most student personal data is processed in the UK. Some systems or service providers may process personal data outside the UK. Where this happens, Boomsatsuma will take reasonable steps to make sure appropriate safeguards are in place.

How we keep your personal data secure

We take reasonable steps to keep your personal data secure. This includes using secure systems, limiting access to staff who need the information, and requiring staff to handle personal data appropriately.

Further information is available in Boomsatsuma's Data Protection Policy [\[Link\]](#).

How long we keep your personal data

We keep personal data only for as long as we need it. Information that is no longer needed will be securely deleted, destroyed, anonymised or otherwise securely disposed of.

We will normally keep your core local student record for up to six years after you leave or complete your programme.

Some limited information may be kept for longer where this is necessary to confirm your study with Boomsatsuma, evidence teaching, support or local assessment activity, verify local records, support Kingston University with academic or award-related queries, meet legal or regulatory requirements, or respond to future queries. This may include your name, dates of study, programme, local attendance records, assessment records, marks, progression information and relevant communications.

Financial records held by Boomsatsuma may be kept for up to six years after the end of the financial year to which they relate.

We may keep relevant records for longer where this is necessary to deal with a complaint, appeal, safeguarding concern, conduct matter, fraud concern, legal claim, regulatory requirement or other serious matter.

Kingston University will keep official student records in line with its own privacy notice and retention arrangements. The HESA Student Collection Notice explains how information submitted to HESA is used and retained after it has been submitted.

Your rights

You have rights under data protection law. These include the right to ask for a copy of your personal data, ask for inaccurate or incomplete data to be corrected, ask for your data to be deleted in certain circumstances, object to or restrict how your data is used in certain circumstances, request the transfer of your data in certain

circumstances, withdraw consent where we rely on consent, and complain to the Information Commissioner's Office.

You can find more information about your rights from the Information Commissioner's Office [\[Link\]](#).

How to contact us

For questions about your studies, contact your programme team or the relevant Boomsatsuma support team.

For questions about how your personal data is used, or to exercise your data protection rights, contact dataprotection@boomsatsuma.com.

Appendix A – Version History

Version	Date	Changes
1	10 June 2026	New draft