

GUGA EDUCATION LTD

GDPR & Privacy Policy

Student Recruitment and Education Consultancy Services

Company name	GUGA EDUCATION LTD
Company number	16844981
Registered office	76 Grosvenor Rd, London, IG1 1LA, United Kingdom
ICO registration reference	ZC150141
Policy owner	Company Director / Management Team
Main contact	partners@gugaeducation.com
Review cycle	At least annually or when legal, operational, or partner requirements change

Purpose of this policy: This policy explains how GUGA EDUCATION LTD collects, uses, stores, shares, and protects personal data in connection with student recruitment, admissions support, education consultancy, partner due diligence, and related services.

1. Introduction

GUGA EDUCATION LTD is committed to protecting personal data and respecting the privacy rights of students, applicants, clients, prospective students, parents or guardians, referees, education partners, suppliers, and other individuals whose information we process.

This policy is intended to support compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant guidance issued by the Information Commissioner's Office (ICO). It should be read together with any service agreement, application form, consent statement, or privacy notice provided to an individual at the point their data is collected.

2. Who we are and our role

GUGA EDUCATION LTD is a UK-based education consultancy that supports students with admissions and related application processes for colleges, universities, and education providers. For most personal data that we collect directly from students or clients, GUGA EDUCATION LTD acts as a data controller. This means we decide why and how that personal data is processed.

Where we process information strictly on behalf of a partner institution, we will follow the relevant agreement and data protection instructions agreed with that partner, where applicable.

3. Scope of this policy

This policy applies to personal data processed in connection with:

- student enquiries and consultations;
- course and institution selection support;
- admissions guidance and application preparation;
- document checks, interview preparation, and student support;
- communications with education partners, universities, colleges, and admissions teams;
- partner due diligence, compliance checks, and business administration;
- marketing communications where permitted by law and the individual's choices.

4. Personal data we may collect

Depending on the service requested, we may collect and process the following categories of information:

Category	Examples
Identity and contact data	Name, date of birth, nationality, phone number, email address, address, emergency or guardian contact details where relevant.
Application and education data	Chosen course, education history, qualifications, transcripts, certificates, English language level, CV, personal statement, references, interview notes, and application status.
Immigration and residency data	Passport, visa status, BRP/eVisa or share code information, right-to-study information, residency evidence, and related documents where needed for admissions or funding checks.
Financial and funding-related data	Information needed to support funding, Student Finance or fee-status guidance, such as general financial circumstances or evidence requested by an institution or funding body.
Special category data	Health, disability, learning needs, or medical information only where voluntarily provided and necessary to support reasonable adjustments, student support, or an application requirement.
Communication data	Emails, WhatsApp messages, call notes, consultation records, meeting notes, and feedback.
Technical and website data	Website usage, cookies, IP address, device information, and analytics data where our website or online platforms are used.
Business contact data	Contact details of partner representatives, suppliers, consultants, and other business contacts.

5. How we collect personal data

We may collect personal data:

- directly from the individual, for example during consultations, application support, online forms, messages, calls, or meetings;
- from parents, guardians, referees, advisers, or authorised representatives where appropriate;
- from education providers, universities, colleges, partner organisations, and admissions teams;
- from public sources, company registers, professional platforms, or official portals where this is necessary for due diligence or business administration;
- through our website, social media pages, advertisements, CRM systems, email, cloud storage, and communication platforms.

6. Why we use personal data and lawful bases

We only use personal data where there is a lawful basis to do so. The main lawful bases we rely on are contract or pre-contractual steps, consent, legitimate interests, legal obligation, and, where special category data is processed, an additional lawful condition such as explicit consent or another applicable condition under UK data protection law.

Purpose	Examples of use	Likely lawful basis
Responding to enquiries	Answering questions, arranging consultations, assessing initial suitability.	Pre-contractual steps; legitimate interests; consent where applicable.
Providing education consultancy services	Course selection, admissions guidance, document preparation, interview preparation, application support.	Contract; pre-contractual steps; legitimate interests.

Purpose	Examples of use	Likely lawful basis
Submitting or supporting applications	Sharing relevant documents or application information with universities, colleges, education providers, or admissions teams when authorised.	Contract; consent; legitimate interests.
Funding, fee status, and compliance support	Helping the student understand documentation requirements for funding, fee status, residency, or right-to-study checks.	Contract; legal obligation; legitimate interests; consent where required.
Reasonable adjustments or support needs	Using disability, health, or learning-needs information to support an application or student support request.	Explicit consent and/or applicable special category condition; contract.
Business administration and due diligence	Maintaining records, partner onboarding, audits, invoicing, compliance checks, and responding to partner due diligence requests.	Legal obligation; legitimate interests; contract.
Marketing and updates	Sending relevant information about services, events, intakes, offers, or education opportunities.	Consent or legitimate interests, with opt-out available.
Legal claims and risk management	Keeping records to protect the company, students, partners, or others in case of disputes or legal obligations.	Legitimate interests; legal obligation.

7. Special category data and sensitive information

We may occasionally process sensitive information, including health, disability, learning needs, medical information, or other special category data. We only process this information where it is relevant to the student's application, reasonable adjustments, welfare, or support needs, and only where an appropriate lawful condition applies.

We will not request more sensitive information than is necessary. Access to sensitive data is restricted to staff or partners who need it for a legitimate purpose, and it is handled with additional care.

8. Who we may share personal data with

Where necessary and appropriate, we may share personal data with:

- universities, colleges, education providers, pathway providers, awarding bodies, and admissions teams;
- Student Finance or relevant funding bodies only where the student has authorised or requested support and sharing is necessary;
- English language testing providers, interview teams, or assessment providers where relevant to an application;
- IT, email, CRM, cloud storage, website, and document management providers that help us run our business securely;
- professional advisers, accountants, legal advisers, insurers, auditors, and compliance consultants;
- regulators, public authorities, law enforcement, or courts where required by law or necessary to protect legal rights;
- education partners and recruitment partners for the purpose of application support, onboarding, compliance, or student success.

We do not sell personal data. We require third parties to handle personal data securely and only for authorised purposes.

9. International data transfers

Some students may ask us to support applications or enquiries involving institutions or partners outside the United Kingdom. In those cases, personal data may need to be transferred internationally. Where international transfers are required, we will take appropriate steps to protect the data, such as using recognised transfer safeguards, contractual protections, adequacy arrangements, or the individual's explicit instructions or consent where appropriate.

10. How long we keep personal data

We keep personal data only for as long as necessary for the purposes for which it was collected, including providing services, meeting legal and regulatory requirements, resolving disputes, maintaining business records, and protecting our legitimate interests.

Type of record	Typical retention period
General enquiries that do not proceed	Up to 24 months from the last meaningful contact, unless earlier deletion is requested and no overriding reason applies.
Student application and service records	Up to 6 years after the end of the service relationship or last meaningful contact, where needed for audit, compliance, contractual, or legal purposes.
Identity, immigration, and funding evidence	Only as long as necessary for the application, compliance, partner due diligence, or legal/audit requirements; normally no longer than the relevant student/application record period.
Marketing records	Until consent is withdrawn, the individual opts out, or there has been no meaningful engagement for 24 months.
Business, supplier, and partner due diligence records	Up to 6 years after the end of the business relationship, unless a longer period is required by law or necessary for legal claims.

When data is no longer required, we will delete, securely destroy, or anonymise it where reasonably practicable.

11. How we protect personal data

We use appropriate organisational and technical measures to protect personal data, including:

- restricted access to student files and confidential documents;
- secure email, cloud storage, and document management practices;
- password protection and two-factor authentication where available;
- limiting access to staff, consultants, or partners who need the data for authorised purposes;
- staff awareness of confidentiality and data protection responsibilities;
- secure deletion or archiving procedures where data is no longer required;
- reviewing partner and supplier handling of personal data where appropriate.

12. Individual rights

Individuals have rights under UK data protection law. Subject to legal conditions and exemptions, these may include the right to:

- be informed about how their personal data is used;
- request access to their personal data;
- ask for inaccurate or incomplete data to be corrected;
- ask for personal data to be deleted in certain circumstances;
- ask us to restrict processing in certain circumstances;
- object to processing based on legitimate interests or direct marketing;
- request data portability where applicable;
- withdraw consent at any time where processing is based on consent;

- not be subject to certain types of automated decision-making.

To exercise any rights, individuals should contact GUGA EDUCATION LTD using the contact details in this policy. We may need to verify identity before responding to a request.

13. Marketing communications

We may send information about our services, education opportunities, intakes, events, or updates where the individual has consented or where we have a legitimate interest and the communication is permitted by law. Individuals can opt out of marketing communications at any time by replying to the message or using any unsubscribe option provided.

14. Website, cookies, and social media

If we operate a website or use social media pages, we may collect limited technical and analytics information to understand engagement, improve our services, and respond to enquiries. Where cookies or similar technologies are used, we will provide appropriate information and obtain consent where required. Social media platforms may also process personal data under their own privacy notices.

15. Automated decision-making

We do not make admissions, funding, or eligibility decisions solely by automated means. Final admissions, funding, visa, and fee-status decisions are made by the relevant institution, authority, or funding body, not by GUGA EDUCATION LTD.

16. Data incidents and breaches

If we become aware of a personal data incident or breach, we will assess the risk, take steps to contain and resolve the issue, and notify affected individuals, partners, or the ICO where required by law. We will keep appropriate internal records of data incidents and lessons learned.

17. Complaints

Individuals should contact GUGA EDUCATION LTD first if they have concerns about how their personal data has been handled. If they are not satisfied, they may also complain to the Information Commissioner's Office (ICO), the UK data protection regulator.

ICO website: <https://ico.org.uk/make-a-complaint/>

18. Contact details

Data Controller: GUGA EDUCATION LTD

Registered office: 76 Grosvenor Rd, London, IG1 1LA, United Kingdom

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ICO registration reference: ZC150141

Email: partners@gugaeducation.com

19. Policy review and updates

This policy will be reviewed periodically and updated where necessary to reflect changes in our services, legal requirements, or partner obligations.