

Privacy Policy (Website)

Policy number:	PP001	Policy Owner:	Marketing Manager
EIA Status:	[EIA Status]	EIA meeting date:	[EIA Meeting Date]
Approved by:	SLT	Date approved:	11 March 2026
	Committee		N/A
	Board		N/A
Review frequency:	Annually	Next review due:	01/03/2027
External website:	Yes	Status:	Active
Linked policies/ documents	<ul style="list-style-type: none"> • General Data Protection Policy • IT Code of Conduct 		

Policy Summary

This policy explains how Newbury College and University Centre Newbury (UCN) collects, uses and protects personal data via its website, in line with UK GDPR, the Data Protection Act 2018 and PECR. It covers data submitted through online forms and data gathered via cookies and tracking tools. It outlines lawful bases, retention, security and users' rights.

Privacy Policy (Website)

1. Policy Statement and Purpose

Newbury College and University Centre Newbury (UCN) are committed to protecting the privacy and security of visitors to our website. We recognise the importance of transparency regarding how we collect, use, and store personal data obtained through our digital channels. This policy ensures that all data processing activities conducted via our website comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Privacy and Electronic Communications Regulations (PECR).

Purpose

The purpose of this policy is to:

- Define the types of personal data collected through the College website.
- Explain the use of cookies and tracking technologies.
- Establish clear procedures for the lawful processing of web-based data.
- Ensure users are fully informed of their rights regarding their digital data.

Scope

This policy applies exclusively to:

- Personal data collected directly via the Newbury College and UCN websites (e.g., through enquiry forms, online applications, and event registrations).
- Digital tracking data and cookies deployed on users' devices when visiting our domains.

Exclusions: This policy does **not** cover data collected via offline methods (e.g., paper forms), which is governed by the General Data Protection Policy.

2. Definitions

- **Cookie:** A small text file stored on a user's device by a website to remember information about the user, such as login status or browsing history.
- **IP address:** A unique string of numbers that identifies each computer using the Internet Protocol to communicate over a network.
- **Personal data:** Any information relating to an identified or identifiable living individual (e.g., name, email address).
- **CRM:** A marketing automation platform used by the College to track website visitor engagement and manage enquiries.
- **Pixel:** A piece of code embedded in the website that allows third-party platforms (like Facebook) to track conversions and build audiences for advertising.

3. Responsibilities

- **Marketing Manager:** Ensuring the website's privacy notices are up-to-date, managing cookie consent mechanisms, and overseeing the data collected via marketing forms.
- **Data Protection Officer (DPO):** Monitoring compliance with UK GDPR and acting as the point of contact for complex data subject requests.
- **IT Services Manager / Site Host:** Ensuring the security of the servers where web data is stored and maintaining the SSL certification for the website.

4. Procedures

4.1 Data collection methods

We collect data on our website in two ways:

1. **Direct submission:** When a user voluntarily completes a form. The data collected typically includes name, contact details, date of birth, and interest.
2. **Automated technologies:** Through cookies and tracking scripts which collect technical data (IP address, browser type) and behavioural data (pages visited, time spent).

4.2 Use of cookies and tracking technologies

The College website uses the following categories of cookies. Users must be given the option to accept or reject non-essential cookies via a "Cookie Banner" upon their first visit.

- **Strictly necessary cookies:** Essential for the website to function (e.g., remembering items in a basket or secure login areas). These do not require consent.
- **Performance/Analytical cookies (Google Analytics):** These allow us to recognise and count the number of visitors and see how visitors move around our website. This helps us improve the way our website works. IP addresses are anonymised where possible.
- **Targeting/Marketing cookies (Facebook/Meta Pixel):** These record visits to the website, the pages visited, and links followed. We use this information to make our website and the advertising displayed on it more relevant to users' interests. We may share this information with third parties (such as Meta) for this purpose.
- **Functionality/Tracking cookies (Constant Contact Lead Gen & CRM):** Formerly known as SharpSpring, this tool uses cookies to track a user's journey through the site. If a user identifies themselves (e.g., by filling in a form), this tracking data is linked to their personal record to help us provide tailored information and support their application journey.

4.3 Lawful basis for processing

- **Consent:** We rely on consent for placing non-essential cookies and for sending marketing communications to new enquiries.
- **Contract:** We process data submitted via "Application Forms" on the basis that it is necessary to take steps at the request of the applicant prior to entering into a student contract.

- **Legitimate interest:** We may process enquiries to answer questions and provide course information, as this is in the legitimate interest of both the College and the potential student.

4.4 Data Retention (Web Data)

- **Cookie data:** Retention varies by cookie type. Session cookies expire when the browser is closed. Persistent cookies (e.g., Google Analytics) are retained for a set period (typically 14-26 months) before automatic deletion.
- **Form data:** Personal data submitted via web forms is transferred to the College's secure Management Information System (MIS) or CRM. Once transferred, it is governed by the College's central retention schedule. Data remaining within the website content management system (CMS) is purged in line with the College's central retention schedule.

5. Compliance and Enforcement

The Marketing Manager will conduct quarterly audits of the website's cookies to ensure the cookie declaration remains accurate.

Any member of staff or third-party contractor found to be deploying tracking scripts without authorisation or bypassing the cookie consent mechanism will be subject to disciplinary action or contract termination.

Any potential data breach involving website data (e.g., accidental exposure of form entries) must be reported immediately to the DPO in accordance with the General Data Protection Policy.

6. References

- [UK General Data Protection Regulation \(UK GDPR\)](#)
- [Data Protection Act 2018](#)
- [Privacy and Electronic Communications Regulations \(PECR\)](#)

7. Supporting Documents

- Appendix A: Privacy Policy (for website)
- General Data Protection Policy
- IT Code of Conduct

8. Review and Monitoring

This policy will be reviewed annually to ensure its effectiveness and compliance with relevant legislation.

Reviewed: March 2026

Next review date due: March 2027

Appendix A: Privacy Policy (for website)

This text is designed to be placed directly on the website, linked from the footer and relevant forms.

Privacy and cookie notice

Last Updated: March 2026

Who we are

Newbury College and University Centre Newbury (UCN) respect your privacy. This notice explains how we handle the personal information you provide to us when using our website and the cookies we use to improve your experience.

What information we collect

We only collect personal information on this website when you voluntarily provide it to us. This typically happens when you:

- Apply or enrol for a course.
- Register for an event.
- Submit a form.

The information we collect may include your name, email address, phone number, date of birth, and areas of interest.

How we use your information

We use your data to:

1. **Process applications/enrolments:** To assess your eligibility and enrol you on a course.
2. **Respond to enquiries:** To answer your questions and provide advice.
3. **Improve our site:** To analyse how visitors use our site so we can make it better.
4. **Marketing:** If you agree, we will send you information relevant to you.

Cookies and tracking

Our website uses cookies (small text files placed on your device) to help our site function and to understand how you use it.

Cookie Type	Purpose	Key Providers
Necessary	Essential for the website to work (e.g., security, page navigation). You cannot switch these off.	Newbury College

Cookie Type	Purpose	Key Providers
Statistics	Helps us understand how visitors interact with the website by collecting anonymous information.	Google Analytics
Marketing	Used to track visitors across websites to monitor the performance of marketing campaigns.	Facebook (Meta Pixel) Google Analytics
Functionality	Allows us to recognise you when you return and track your journey to help us tailor our communications to you.	Constant Contact Lead Gen & CRM (formerly SharpSpring)

Managing your cookies

When you first visit our site, you will see a banner allowing you to accept or reject non-essential cookies. You can change your preferences at any time by clicking the "Cookie Settings" icon in the bottom corner of the screen.

Sharing your data

We do not sell your data. We share web data only with trusted partners and platforms who help us run our systems:

- **Learning Records Service (LRS):** To create/obtain/maintain a unique learner number (ULN) to check prior attainment.
- **Partner providers:** To manage application and enrolment on programmes provided in partnership with another provider (e.g., football academies, universities, etc.)
- **Constant Contact (CRM):** To manage our email marketing and enquiries.
- **Analytics platforms:** To manage our advertising (data is anonymised where possible).

Your rights

You have the right to request a copy of the information we hold about you, to ask us to correct it, or to delete it. If you wish to exercise these rights regarding your website data, please contact: dataprotection@newbury-college.ac.uk