

Privacy Notice

Document Name	KU, KUIC SGU application Privacy Notice
Brief Description	KU, KUIC & SGU have a tri-partite data sharing agreement for student progression on the HE Cert Medical Biosciences at Keele University & MD4 at St Georges University
Responsibility	Christopher Sharpe
Initial Issue Date	25.08.2026

Date	Version Number	Summary of Changes	Reviewer name & department
21/07/2026	0.1	Draft amendments	H Selby & E Gillbanks – Privacy C Sharpe - KUIC
28/07/2026	0.2	Second stage review	H. Selby - Privacy

1. Introduction

Navitas respects your right to privacy. This privacy notice explains who we are, how we collect, share and use personal information about you and how you can exercise your privacy rights.

Navitas reserves the right to make changes periodically to this Privacy Notice at our discretion, when needed. Any changes will be communicated to you, so you are kept up to date with the information you are entitled to.

2. Navitas

Navitas is a global education provider (ABN 69 109 613 309). Our head office is in Perth, Western Australia at the following address:

Navitas Pty Ltd Level 8 Brookfield Place, 125 St Georges Terrace PERTH WA 6000 Australia

Information Classification: Public

V0.2

The Company has subsidiary companies and affiliated organisations operating in Australia, New Zealand, Canada, UK, Europe, Africa, Southeast Asia, North Asia, South America, the Middle East, and the USA, collectively called the “Company”.

The European head office is in the UK at the following address:

- Navitas UK Holdings Limited, The Lambourn, Wyndyke Furlong, Abingdon, Oxfordshire, OX14 1UJ

You can contact Navitas for any privacy related questions or concerns, from any country in the world by emailing the Privacy Team at privacy@navitas.com

3. The personal data we use about you

To enable progression and to complete your chosen degree of HE Cert Medical Biosciences at Keele University and Doctor of Medicine degree (MD4) at St Georges University, we will need to share your data with both of these institutions.

We will collect, process and share personal details such as your name, address, age, contact details and gender.

We will also collect

- Education history and qualifications to verify your eligibility for progression
- Visa, passport and immigration information
- Funding and financial support information
- Agent’s details (if applicable)

We may also collect and share special category data (such as health, disability or ethnic background) to provide support or to meet legal requirements; this will be done in accordance with the GDPR and for SGU Grenada Data Protection Act 2023 (GDPA).

4. How we will use your personal data

- a) To facilitate your participation on the course throughout its lifecycle
- b) To assess your application for admission, determine your eligibility for the programme(s) applied for, communicate with you regarding your application and make decisions about offers of study.
- c) To provide information regarding your application and enrolment to Keele University and St Georges University to monitor your eligibility for progression.
- d) Managing the admissions process, verifying the information provided to make enrolment decisions and administering your student record if successful.
- e) Assess your eligibility for funding and tuition fee status.
- f) If you wish to review how we use your data, you’ll find details in the ‘What are my rights?’ section below.

- g) We will use your personal data to assess your application, including the following reasons:
- i. We may keep a record of communication with you. To protect our business and you from fraud and other illegal activities.
 - ii. To comply with our legal obligations under relevant immigration legislation, assess your eligibility to study in the United Kingdom and provide support services to international students, including immigration welfare and assistance with visa applications.
 - iii. To help us make reasonable adjustments for any disabilities and provide additional learning support to support your progression and meet our legal and regulatory obligations, including implementing relevant safeguards for applicants who are under 18.
 - iv. Where an agent has been used, we may use this information to contact and provide feedback to your agent on the status and outcome of your application.

5. The lawful basis for collecting and processing your personal data

Our lawful basis for processing your personal data under Article 6 of the GDPR includes:

- **Contract:** Covering application processing with the view of entering into a contractual relationship, admission decisions and enrolment.
- **Legal obligation:** Right to study checks, UK immigration compliance, and statutory record keeping.
- **Legitimate interest:** where we process data for preventing and detecting fraud, internal administration, communications with applicants and authorised agents.

The lawful basis for processing special category data under Article 9 of the GDPR includes:

- **Explicit consent:** with your explicit consent, if we require special category data, we'll tell you what we need and why. You may choose to agree or revoke that consent later. We will only process special category data when the law allows it.
- **Substantial public interest:** To provide reasonable adjustments, equality monitoring, fraud prevention, public safety or immigration compliance.

6. How long do we keep your Personal Data?

- For accepted applications; We will retain your personal data in conjunction with your student contract timescales
- For refused applications; we will retain your personal data in line with our records retentions schedule and securely delete or anonymise it when it is no longer required.

7. Sharing your Personal Data

- When you apply online it will be shared with our Admissions team to process your application
- In order for you to progress to complete your chosen degree of HE Cert Medical Biosciences at Keele University and MD4 at St Georges University, we will need to share your data with both of these institutions; this will be done in a safe and secure manner.
- We sometimes share your personal data with trusted third parties to provide services and business functions. An example of a third party would be a Navitas contracted education agency in your region and/or a University Partner.
- We set very clear directions and expectations for those organisations regarding the safety and protection of your privacy and personal data.
- Further details of this can be found in your student contract

8. International Transfers of your Personal Data

International transfers will take place within Navitas and to St George's University situated in Grenada, under strict International Transfer standards, requirements and documentation. Our internal sharing is covered by our Intra Group Data Sharing Agreement which ensures your personal data is safe and meets legal requirements within our Navitas group.

9. Your rights over your Personal Data explained

The rights you have may be different depending on where you live in the world, or where in the world Navitas is using your personal data. If your country is not listed below, please contact: privacy@navitas.com for further information.

If you live in the UK or the EU (including Liechtenstein, Norway, and Iceland) your rights are listed below. Depending on what lawful basis is being used to collect and process your personal data, some of the data subjects' rights may not be engaged. We have greyed out those which do not apply to you for the purposes of this privacy notice.

- Right of access – Request a copy of the personal data Navitas holds on you.
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to Portability
- Right to object and automated individual decision-making
- Right to object

For any questions, queries, or to make a request, no matter where in the world you are located, please email privacy@navitas.com.

10. Questions or Issues you may have

If you are contacting us to complain about an alleged breach of this Privacy Notice, or you have a question, please provide us with as much detail as possible so that we can deal with your concern quickly and effectively.

We will take every privacy complaint seriously and assess it with the aim of resolving the issue swiftly.

11. Our Contact Details

If you wish to contact the DPO for Navitas, and raise any queries or concerns, they can be contacted via privacy@navitas.com

12. Contacting your Supervisory Authority

If you need to make a complaint about how Navitas collects and uses your personal data, we kindly ask that you contact us in the first instance on privacy@navitas.com. The Regulators, no matter what country they reside in, would prefer that Navitas tries to resolve any issues with you first before you contact them.

However, the Regulators are there for your concerns, and if you feel Navitas has not handled your complaint appropriately, we encourage you to contact them. Navitas is committed to open and transparent processing of your personal data and welcome the Regulators view.

You may contact the Regulator in whichever country you live and details of them can be found via a quick Google search, if you are not already aware of them. Alternatively, please reach out to our privacy team for advice, they will be happy to assist you.

UK

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Email: casework@ico.org
Telephone: 0303 123 1113
Website - www.ico.org.uk