Website, Cookies and General Enquiries Privacy Notice

Owner: Data Protection Officer
Contact: Dataprotection@sirm.ac.uk

Effective from	Last reviewed	Next review due
21 April 2026	21 April 2026	21 April 2027

1. About this notice

This privacy notice explains how SIRM College collects, uses, stores, shares and protects personal information about people who use our website, contact us, submit online forms, attend events, make general enquiries, or interact with SIRM College before becoming an applicant, student, staff member or other formal stakeholder.

It also explains how we use cookies and similar technologies on our website.

This notice should be read alongside any other privacy information provided to you at the point where your information is collected. For example, if you apply to study with SIRM College, the Applicant Privacy Notice will also apply. If you enrol as a student, the Student Privacy Notice will also apply.

2. Who we are

SIRM College is the data controller for the personal information it collects and uses about staff, workers and others carrying out work on its behalf, unless we tell you otherwise.

This means that SIRM College is responsible for deciding how and why your personal information is used, and for ensuring that it is handled in accordance with UK data protection law.

For some activities, SIRM College may process information jointly with, or on behalf of, another organisation. This may include awarding bodies, validating universities, admissions services, student finance bodies, recruitment agents, qualification-checking services, UKVI, or other relevant bodies.

3. How to contact us

If you have any questions about how your personal information is used, or if you wish to exercise your data protection rights, you can contact:

Data Protection Officer / Data Protection Contact
SIRM College

Email: dataprotection@sirm.ac.uk

You also have the right to complain to the Information Commissioner's Office, the UK regulator for data protection matters on https://ico.org.uk | Tel: 0303 123 1113.
We would encourage you to contact us first so that we can try to resolve your concern.

4. Personal information we collect

We may collect and use the following types of personal information about applicants and prospective students:

- **Identity and contact details,** including name, email address, telephone number, postal address and organisation.
- **Enquiry information,** including the course, service, event or subject you are interested in, the content of your message, and records of our response.
- **Event information,** including event bookings, attendance records, accessibility requirements, dietary information where relevant, questions submitted and feedback.
- **Website and technical information,** including IP address, browser type, device information, operating system, pages visited, time spent on pages, referral source, website interaction data, cookie preferences and analytics information.
- **Marketing and communication information,** including communication preferences, consent records, campaign responses, mailing list subscriptions, unsubscribe requests and records of contact.
- **Online form information,** including information submitted through contact forms, reporting forms, feedback forms, request forms or other website forms.
- **Images, recordings or feedback,** where you attend an event, webinar or activity and we tell you that photography, recording or feedback collection is taking place.

5. Special category personal information

We do not normally collect special category personal information through general website use.

However, you may choose to provide sensitive information when contacting us, completing a form, requesting support or attending an event. This may include information about health, disability, accessibility needs, religious or dietary requirements, safeguarding concerns or other sensitive matters.

Where we process special category information, we will only do so where we have a lawful basis under UK GDPR and a separate special category condition under Article 9

UK GDPR. Where required, we will also meet the relevant conditions under the Data Protection Act 2018.

6. Where we collect information from

We may collect information directly from you when you:

- visit the SIRM College website
- complete an online form
- submit an enquiry
- register for an event
- subscribe to updates or mailing lists
- contact us by email, telephone, website form, social media or another communication route
- provide feedback
- interact with our online content or campaigns

7. Why we use your information

We use personal information collected through our website, online forms, general enquiry routes, events, mailing lists and digital communications for the following purposes:

- to respond to enquiries and requests
- to provide information about SIRM courses, services, events and activities
- to manage website forms and online submissions
- to manage event registration, attendance and follow-up
- to send updates or marketing communications where lawful
- to maintain records of consent, preferences and unsubscribe requests
- to improve our website, communications, services and user experience
- to understand how people use our website
- to maintain website security and prevent misuse
- to manage complaints, feedback, safeguarding concerns or reports submitted through online routes
- to comply with legal, regulatory, safeguarding, equality and education-related obligations
- to protect the rights, safety and welfare of website users, students, staff and others

8. Our lawful bases for using your information

We will only use your personal information where we have a lawful basis under UK GDPR. Depending on the activity, we may rely on one or more of the following lawful bases:

- **Consent**, where we ask for your clear agreement for a specific purpose, such as subscribing to optional marketing updates or accepting non-essential cookies.
- **Contract,** including taking steps before entering into a contract with you, such as responding to an enquiry about studying with SIRM College or providing information you have requested.
- **Legal obligation**, where we must process information to comply with the law.
- **Public task,** where processing is necessary for education, safeguarding, regulatory or public interest functions.
- **Legitimate interests,** where processing is necessary for SIRM's legitimate interests or those of another organisation, provided your rights and freedoms do not override those interests. This may include responding to enquiries, improving our website, managing events, maintaining records, protecting systems and understanding engagement with our services.
- **Vital interests,** where processing is necessary to protect someone's life or safety.

We do not usually rely on consent where processing is necessary to respond to enquiries, manage online forms, maintain website security, keep appropriate records, manage safeguarding or welfare concerns, comply with legal or regulatory obligations, or protect the rights, safety and welfare of individuals. Where we do rely on consent, such as for optional marketing communications or non-essential cookies where required, you can withdraw your consent at any time.

9. Marketing communications

We may use your contact details to send you information about courses, events, application opportunities, services or updates that may be relevant to your enquiry or interests.

Where required by law, we will only send marketing communications with your consent.

You can opt out of marketing communications at any time by using the unsubscribe link in the communication or by contacting dataprotection@sirm.ac.uk.

Opting out of marketing communications will not stop us from responding to enquiries you have made or sending essential service communications where relevant.

10. Cookies and similar technologies

Cookies are small files placed on your device when you visit a website. Similar technologies may also be used to store or access information on your device.

The ICO explains that cookie rules are covered by the Privacy and Electronic Communications Regulations 2003, known as PECR, and that PECR also applies to similar technologies, such as device fingerprinting.

The ICO also states that PECR applies to cookies even where the data is anonymous. SIRM may use cookies and similar technologies to:

- make the website work properly
- keep the website secure
- remember your preferences
- understand how visitors use the website
- improve website performance and content
- support marketing or campaign activity, where lawful

11. Types of cookies we may use

- **Strictly necessary cookies**

These cookies are needed for the website to work. They may support functions such as page navigation, security, accessibility, form submission, cookie preference management or secure access.

These cookies do not usually require consent because they are necessary for the website to function.

- **Analytics or performance cookies**

These cookies help us understand how visitors use the website, such as which pages are visited, how long users spend on the site, and whether users experience errors.

We will only use analytics cookies where we have a lawful basis and, where required, your consent.

- **Functionality cookies**

These cookies allow the website to remember choices you make, such as preferences, settings or information entered into forms.

- **Marketing or targeting cookies**

These cookies may be used to understand the effectiveness of campaigns, deliver relevant advertising, or measure engagement with marketing content.
We will only use marketing or targeting cookies where you have given consent.

12. Cookie consent and your choices

When you visit the SIRM website, you may be asked to choose which non-essential cookies you accept.

You should be able to accept or reject non-essential cookies. You should also be able to change your preferences later.

SIRM will not use non-essential cookies unless it has the appropriate consent or another lawful basis where permitted.

You can also control cookies through your browser settings. However, blocking some cookies may affect how the website works.

13. Online forms and reporting tools

If you use an online form or reporting tool on the SIRM website, we will use the information you provide for the purpose described on or near that form.

This may include forms for enquiries, applications, complaints, safeguarding, wellbeing, feedback, events, requests or other services.

Some forms may collect sensitive information. Where this happens, we will handle the information carefully and only share it with those who need to know for the relevant purpose.

14. Social media and external links

The SIRM website may include links to external websites, social media platforms, partner websites or third-party services.

This privacy notice does not apply to websites or services operated by other organisations. You should read the privacy information provided by those organisations before submitting personal information to them.

If you interact with SIRM through social media, the relevant social media platform may also process your information for its own purposes.

15. Who we share your information with

We may share website, enquiry or event information where it is necessary, lawful and proportionate. This may include sharing information with:

- IT, website, hosting, cloud and software providers
- website analytics and cookie management providers
- marketing and communications service providers
- event management platforms or event venues
- professional advisers, auditors, insurers or legal advisers
- awarding bodies, validating universities or partners where your enquiry relates to a relevant course or service
- regulators, public authorities, police, courts, local authorities or safeguarding agencies where necessary
- external investigators or advisers where needed to manage complaints, reports or concerns
- We will not sell your personal information.

16. International transfers

Some of the systems and services we use may involve personal information being processed outside the UK.

Where this happens, we will ensure that appropriate safeguards are in place, such as adequacy regulations, standard contractual clauses or other lawful transfer mechanisms.

17. How long we keep your information

We will only keep your personal information for as long as necessary for the purpose for which it was collected.

Different types of information may be kept for different periods. For example, general enquiry records may be kept for a shorter period than safeguarding records, complaint records, event records, consent records or records linked to an application.

Cookie preference records may be retained so that we can remember and evidence your choices.

Retention periods are managed in accordance with SIRM's records retention arrangements.

18. How we protect your information

We take appropriate steps to protect personal information against unauthorised access, loss, misuse, alteration or disclosure.

This includes organisational, technical and physical controls such as access restrictions, secure systems, audit logs, staff training, data protection procedures, website security controls and controls over third-party providers.

19. Your rights

Under data protection law, you may have the right to:

- be informed about how your personal information is used
- access the personal information we hold about you
- ask us to correct inaccurate or incomplete information
- ask us to erase information in certain circumstances
- ask us to restrict how we use your information in certain circumstances
- object to certain uses of your information
- ask for certain information to be transferred to another organisation
- withdraw consent where we rely on consent
- complain to the Information Commissioner's Office

The ICO says organisations must provide privacy information when personal data is collected directly from individuals, including where it is collected by observation, such as tracking people online.

To exercise your rights, contact dataprotection@sirm.ac.uk.

20. Complaints about how we use your information

If you are concerned about how we have used your personal information, you should contact us first at:
dataprotection@sirm.ac.uk
You can also complain to the Information Commissioner's Office.
https://ico.org.uk | Tel: 0303 123 1113

21. Changes to this privacy notice

We may update this privacy notice from time to time to reflect changes in law, regulation, SIRM processes, systems, website functionality, cookies, services or third-party providers.

The most recent version will be published on the SIRM College website.