

## Privacy Notice – Students Applying for US Federal Student Aid

The Data Controller of the information being collected is:

The University of the Highlands and Islands (UHI), Executive Office, UHI House, Old Perth Road, Inverness, IV2 3JH. For any queries or concerns about how your personal data is being processed you can contact the relevant Data Protection Officer at [dataprotectionofficer@uhi.ac.uk](mailto:dataprotectionofficer@uhi.ac.uk)

This privacy statement relates to the following process:

Processing required for the administration of loans under US Federal Student Aid. UHI is a participating institution in the Federal Direct Loan Programme (Title IV) for the purpose of administering loans. Further information on the programme is available here: [Fees, funding and scholarships - US Government Federal Student Aid \(uhi.ac.uk\)](#)

Your information will be used for the following purposes:

1. **The administration of your loan application** – assessing the data shared with UHI by Federal State Aid and making decisions based on that information, in line with the requirements of the programme
2. **Communicating with applicants** – letting you know what you are entitled to apply for, based on the information provided to UHI
3. **Providing information to Federal State Aid** – sharing the outcome of the initial assessment (what you are entitled to apply for); advising the Agency that you have enrolled on your course; advising the Agency that you have completed year of study or withdrawn

Our legal reason for using the data is/are:

- Use is necessary for the performance of a contract with you or to take steps, at your request, before entering into such a contract.
- Use is necessary for the performing a task in the public interest or under official authority vested in us.

**Note:** If you were to withhold the personal information we require for this process, the consequences would be: UHI would not be able to fulfil its requirements under the terms of the Federal Direct Loan Programme; your application for loan funding would not be completed.

### Sharing data with third parties outwith your organisation

Your data will, or may, be shared with the following recipients or categories of recipient:

US Government Department of Education, Federal Student Aid.

This process involves your data being sent outside of the EEA. The following safeguard is in place for this international transfer:

- the transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request (Article 49(1)(b))
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person (Article 49(1)(c))

### **Data retention**

Your data will be retained for the following length of time:

Current financial year + 10 years, as required under the terms of UHI's participation in the programme, for audit purposes.

### **Rights of data subjects**

The following rights are rights of data subjects:

- The right to access your personal data
- The right to rectification if the personal data we hold about you is incorrect
- The right to restrict processing of your personal data

The following rights [apply only in certain circumstances](#):

- The right to withdraw consent at any time if consent is our lawful basis for processing your data
- The right to object to our processing of your personal data
- The right to request erasure (deletion) of your personal data
- The right to data portability

You also have the right to lodge a complaint with the Information Commissioner's Office about our handling of your data.