

Scope

1. This document sets out what we do with your personal data specifically relating to individuals registered on Executive Education programmes and/or Corporate and Professional Development courses. This document provides information regarding the personal data we collect and what we do with it, including your rights as a data subject.
2. This document applies to you if you choose to register and pay for the programme(s) or course(s) either yourself or via your organisation. A learner who registers themselves on the award is responsible for the information that they provide and for making any necessary payments.
3. With organisational registration, an individual can create an account which enables them to register learners and to pay for learning. The learners registered via this route have a responsibility to make sure that their personal information is correct and up to date.

Who we are

4. The Open University is the data controller in relation to the processing activities described below. This means that the Open University decides why and how your personal information is processed.
5. Where this policy refers to “we”, “our” or “us” below, unless it mentions otherwise, it’s referring to the Open University

What information do we collect about you, and how do we collect it?

Information that you give to us

6. When you register on the programme or course you supply us with various pieces of information, including: name, the name of your business or institution (and, potentially, the address of this business or institution and your position within that business or institution), email address and job title. We might also collect a second email address for use as a backup contact and we also ask you to supply your date of birth and gender.
7. Any information that you provide regarding payment is held separately.
8. You may submit “special category” information to us, for example information about special circumstances for assessment or examination purposes, or information pertinent to an enquiry or complaint. We only use this information for the purpose for which it was provided. If you make a complaint or appeal in respect of your request, it is in our legitimate interest to process your personal data for this purpose.

Information that we collect automatically

9. We will automatically collect information about your participation in online learning and assessment activities, your use of module and related websites, and all forms of assessment activities, including diagnostic quizzes you complete.
10. We may automatically collect technical information when you browse our websites. Further information about this is given in our [privacy and cookies policies](#).
11. We record telephone calls to our main student phone number, and we monitor other communications between you and The Open University to make sure that we have carried out your instructions correctly and to help us improve our services through staff training. We may track if you open emails from us or click links within them.

Information which is given to us by your employer

12. Your employer may provide the information to register you on a course directly to us: name, the name and address of your business or institution, email address and job title, date of birth and gender. We might also collect a second email address for use as a backup contact

How do we use your personal information?

13. We collect and process a broad range of personal data about you in order to deliver our services and support you, to manage our operations effectively, and to meet our legal requirements.
14. Activities relating to your contract with The Open University

The following data processing activities are necessary for the contract we have with you, as set out in your Registration Agreement and Conditions of Registration. They include:

- Registering you as a learner
- Administering your fee payment
- Maintaining your student record
- Administering your learning, including access to systems
- Monitoring your engagement with us. We use course website activity, submission of assessments and your contact with the OU to perform checks on your progress
- Managing queries, complaints, appeals and allegations of misconduct •
- Providing learner support

If you do not supply any of the information requested during the registration process, you will not be able to register for the programme. It is important that you keep the information provided at registration up to date. It is your responsibility to keep your personal information accurate by updating your profile within the programme's website. You must notify us within a reasonable time if you change your name, the country where you are resident or ordinarily resident, or any of your contact details.

15. Activities relating to our legal obligations

We have an obligation to provide reasonable adjustments for students with disabilities, and a duty to advance equality of opportunity between people who share a protected characteristic and those who do not.

16. Information we process in our legitimate interests

We may use and process your personal information where it is necessary for us to pursue our legitimate interests for the following purposes:

a) Internal planning and analysis

We use personal data to analyse how successful the learning is. For example, to see whether groups of people with the same characteristics such as age group, gender, location, etc. respond to the learning activities more positively than other groups. This helps us to be more efficient in planning and improving our activities and communications.

b) Communications and marketing purposes

- If you register directly, to send you marketing communications about our course, or other services. You are able to opt out of receiving marketing communications by emailing executive-education@open.ac.uk
- To analyse our student body to inform our marketing strategy and to enhance and personalise your learner experience
- To verify the accuracy of data that we hold about you and create a better understanding of you as a learner
- We use “cookies” and similar technologies to enable functionality in our websites. For more detailed information on how we use cookies see our [privacy and cookies policies](#)
- We may invite you to take part in research to improve our services. If you do not wish to receive these communications please contact us at executive-education@open.ac.uk

c) Internal activities

- To prevent fraud and other criminal activities.
- To audit our activities in order to ensure regulatory compliance
- To monitor use of IT services and ensure network and information security
- To test and maintain our systems and to ensure robust performance
- To help us improve our services via staff training
- Administration of The Open University’s CCTV system, to provide a safe environment and facilitate the prevention and detection of crime
- To record concerns about people at risk of being drawn into terrorism (Prevent)

Who do we share your information with?

17. We might, on occasion, share anonymised data with our partners who helped to create this programme of learning so that they can gauge the success and popularity of the scheme. For details of these partners, please refer to the programme's website - www.open.ac.uk/corporate-professional-development. Our partners will not be able to identify individuals from the reports we provide.
18. We occasionally use third party suppliers and service providers to provide learner support. When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.
19. We will share information about your progress with your employer, if they registered you with the OU.

Do we transfer information outside the EEA?

20. Generally, information you provide to us is stored on our secure servers, or on our cloud-based systems which are located within the UK or the EEA.
21. However, there are times when we do transfer information outside the EEA. If we transfer personal data to service providers or international partners outside the EEA, we take steps to ensure that your privacy rights are protected by including the relevant [standard contractual clauses](#) in any agreements.

How long do we keep your personal information for?

22. If we collect your personal information, the length of time we keep it for is determined by a number of factors including our purpose for using the information and our legal obligations.
23. We have a retention schedule for information and keep identifiable records only for as long as they have a legal or business purpose.
- i. We keep information relating to your study and related queries and communications, for six years after you have completed the course. This is in order to inform our ongoing relationship with you or your employer, to facilitate confirmation of study or identification of previous study for certification and in case it is necessary to establish, bring or defend legal claims
 - ii. We destroy some information within four years, where it does not have a longer term impact, and is not required for business purposes.
24. In addition, the University is required under UK tax law to keep details of financial transactions such as payments for a minimum of 6 years. After this time any information about payments will be destroyed.

Your rights

25. You have a number of rights in relation to your personal information, which apply in certain circumstances. In order to exercise any of these rights, please contact us using the details in this document. These are described in more detail [by the Information Commissioner's Office](#).

26. You have the right

- to [access the personal information](#) we hold about you and to receive a copy
- to [correct inaccuracies](#) in the personal information we hold about you
- to [have your data deleted](#) when it is no longer required

In some circumstances, you also have the right

- to [limit how we use](#) your personal information,
- to [data portability](#)
- to [object to the use](#) of your personal information

Where we rely on consent as the legal basis on which we process your personal information, you may also withdraw that consent at any time.

27. If you are concerned about the way we have processed your personal information, you can complain to the Information Commissioner's Office (ICO). Please visit the ICO's website www.ico.org.uk for further details, or you can use their online tool for reporting concerns: <https://ico.org.uk/concerns/>

Contact us

28. Please direct any queries about this policy or about the way we process your personal information to our Data Protection Officer using the contact details below.

- Email data-protection@open.ac.uk
- Telephone +44 (0)1908 653994
- By post: The Data Protection Officer, PO Box 497, The Open University, Walton Hall, Milton Keynes MK7 6AT.
- Data subjects within the EU can contact the Data Protection Officer c/o the Open University in Ireland: Holbrook House, Holles Street off Merrion Square, North Dublin 2, [D02 EY84](#).