

Privacy Notice - Immigration Support Services

1. Introduction

BSA Group Legal Services Ltd ("BSA Legal", "we", "us") is a UK-based legal services provider offering immigration and legal support to UK independent schools, international students and their families. We are a data controller under the UK General Data Protection Regulation (UK GDPR).

We are committed to protecting personal data and fulfilling our legal obligations under the UK GDPR and Data Protection Act 2018.

This document outlines what personal data we collect, how we collect, process, share, transfer and store your data, the purpose and lawful basis for processing your data, and your rights. This document also sets out our procedure for reporting, investigating, and notifying relevant parties in the event of a data breach.

You can contact us at:

Name: Kate Hollyer, Director

Address: BSA Group Legal Services Ltd

167-169 Great Portland Street 5th Floor, London W1W 5PF

Email: <u>Legal@bsagroup.org.uk</u>
Tel: +44 (0)207 798 1583

2. What personal data we collect

We may collect and process the following types of personal data:

- (i) Student and parent/legal guardian names and contact details
- (ii) Educational guardian names and contact details
- (iii) Nationality and other immigration status information (e.g. right to study), including copies of passports
- (iv) Signed parental consent letters
- (v) Birth certificates and certified English translations
- (vi) Interview notes and other records relied upon to make an offer



- (vii) Confirmation of Acceptance for Studies (CAS) details
- (viii) Previous immigration history records or information held
- (ix) Other data reasonably required to support the visa application process

3. How we collect your data

- Data may be provided by the independent school your child will attend.
- We may also collect data directly from you, your legal representative, or your appointed agent.

4. Why we process your data

We process your personal data in order to:

- Advise and support families with UK Child Student / Student visa applications
- Prepare and submit visa applications on your behalf
- Comply with our legal and regulatory obligations as a legal services provider

5. Lawful basis for processing

Our lawful basis under the UK GDPR is:

 Article 6(1)(f) – Legitimate interests, to provide immigration support services as instructed by your child's school, and to fulfil our professional obligations.

Where required, we may also process special category data (e.g. medical information) under:

• Article 9(2)(f) – Establishment, exercise, or defence of legal claims

6. Who we share your data with

We may share your data with:

- The Home Office or UK Visas & Immigration ('UKVI'), for visa application purposes
- Your child's school, where necessary for coordination



Your nominated agent or representative (if applicable)

We do not sell or rent personal data to third parties.

7. International data transfers

Where necessary, data may be accessed from outside the UK (e.g. by you or your agent abroad). We ensure appropriate safeguards are in place, including secure transmission and storage protocols.

8. How long we keep your data

We retain your data for a minimum of 6 years after the conclusion of your immigration matter, in line with legal and regulatory requirements.

9. Personal Data Breach Notification

In the event of a personal data breach, BSA Legal will assess the nature and severity of the breach within 24 hours of becoming aware of it.

If the breach is likely to result in a risk to the rights and freedoms of individuals, we will notify the Information Commissioner's Office (ICO) without undue delay and, where feasible, within 72 hours.

If the breach is likely to result in a high risk to the rights and freedoms of individuals, we will also notify the affected individuals without undue delay.

All breach incidents will be recorded internally, and appropriate mitigation measures will be documented and implemented.

10. Data Subject Rights Requests - Procedure and SLA

BSA Legal respects and facilitates individuals' rights under UK data protection law. When we receive a request from a data subject (including requests for access, rectification, erasure, restriction, objection, or data portability), we will:

- (i) Acknowledge the request within 5 working days of receipt.
- (ii) Respond in full within one calendar month from the date the request is received.



(iii) Where a request is complex or numerous, we may extend the response time by up to two further months. In such cases, we will notify the individual within the initial one-month period, explaining the reasons for the delay.

Requests should be made in writing to our designated data protection contact, whose details are provided in section 1 of this notice.

11. Your rights

You have rights under data protection law, including:

- Right to access your data
- Right to rectify inaccuracies
- · Right to object to processing
- Right to request erasure or restriction
- Right to data portability (where applicable)

You may contact us to exercise any of these rights.

If you are unhappy with how we handle your data, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**.