

Student Consent for Marketing Policy

1. Why we need consent

Utilising the power of personal testimony is a vital part of our recruitment strategy. Showcasing our individual students, their results and achievements, is the life-blood of our efforts towards persuading others to come to Kings.

However, our contract of services to students and /or their parents does not provide us with either a contractual or lawful basis for the use students' personal data for purposes of marketing or publicity without explicit consent.

It is therefore imperative that informed consent is received from every student (or their parent or guardian if under 16).

This policy sets out the means by which this will be achieved, and the mechanisms in place to enable student to withdraw their consent.

2. Personal data requiring consent to publish

The following aspects of personal data will require informed consent before they can be used within a marketing context:

- Name
- Nationality
- Age
- Gender
- Personal opinions/statements
- Examination or other academic test results
- University applications and/or acceptances
- Images clearly showing the individual
- Videos clearly showing the individual

3. Use of personal data in marketing

The following aspects of marketing communication are identified as having the potential to use any or all of the above data:

- Printed publications (brochures, flyers, handbooks)
- Printed and online advertising
- Display banners and posters
- Websites including microsites and blogs
- Social media pages (including Facebook, Instagram, Twitter, Snapchat, Weibo)
- Video channels (YouTube, Vimeo etc).

4. Mechanism for securing consent

i. General Consent Form

This form must be signed by all students as part of their induction process, and with a member of staff clearly explaining the context of the form and its intent.

The default mode of this form is electronic and accessed via Classmate.

<https://kingseducation.fireflycloud.net/before-you-leave-home/my-personal-information>

This should be used for all students with a Classmate login.

A hard copy form is also available for students who do not have a Classmate account, for example short term summer vacation students.

This can be downloaded from the main Kings website:

https://media.kingseducation.com/assets/media/ke-downloads/policies/gdpr/1763_GDPR_GeneralConsent_Web_NonInteractive.pdf

ii. Photo Release Form

At all individual photo and /or video shoots the Photographer/s will carry hard copy Photo Release forms which will be signed by the student to indicate permission to use images in the ways outlined in 3 above as well as their acceptance that the copyright of all images and/or video remains with Kings.

This can also be downloaded from the main Kings website:

https://media.kingseducation.com/assets/media/ke-downloads/policies/gdpr/1763_GDPR_Phoreleaseforms_web_noninteractive.pdf

5. Consent from students Under 16

Students under 16 will be required to complete a specific section of these forms which will also require the signature of a parent or nominated guardian.

6. Ensuring informed content

It is important that appropriate steps are taken to explain all aspects of the required consent, including the intended purpose for students' data and the right to withdraw. In particular, careful consideration must be given to the student's language level and competency, with translated versions of the form to be made available as required.

7. Extent of student body

This consent policy applies to all students irrespective of their nationality or country of origin, and not just to EU nationals. This is because Kings, as an UK-based company, is required to comply with the terms of the General Data Protection Regulation for all its clients.

8. Timeframe for implementation

Strict and comprehensive use of the General Consent Form and Photo Release Form is required from **25th May, 2018** across all Kings operations in the UK and US.

9. Right to withdraw consent

All students must be given clear information about their right to withdraw consent at any time, and the means by which they can do so. This will be by contacting the Kings Data Protection Officer, Allan Maule. Contact details are included on each form.

If consent is withdrawn, we will delete the photograph or video and not distribute it further. If an image is already in circulation in printed format, we will not be able to recall it, but we will ensure that the image will not be included in any future materials. Online images will be withdrawn from use within the time specified in the procedure for responding to objections.