QAA Privacy Notice

This Privacy Notice explains how The Quality Assurance Agency for Higher Education ('QAA', 'we', 'us' or 'our') gathers and processes your personal information in compliance with the relevant data protection regulation and laws. This notice provides you with information regarding your rights and our obligations, and explains how, why and when we process your personal data.

We act as data controller and/or data processor when processing your data. QAA is registered with the Information Commissioner's Office (ICO) with registration number (Z570112X).

Our Data Protection Officer is responsible for overseeing data protection compliance at QAA and can be contacted at governance@qaa.ac.uk.

What is personal data?

Personal data is any information which directly or indirectly identifies an individual, for example, your name, email address or telephone number. Special category personal data is personal data that we look after more carefully because it is sensitive, such as details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic or biometric data. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

What information we collect

QAA processes personal information to meet our legal, regulatory, statutory and contractual obligations and to provide you with information, either about our products and services or about matters of public interest. We will not collect any unnecessary personal data from you and will not process your information in any way other than as specified in this notice without telling you first.

Our websites collect user interaction data. We partner with Microsoft Clarity to capture how you use and interact with our website through behavioural metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimisation and fraud/security purposes. For more information about how Microsoft collects and uses your data, visit the Microsoft Privacy Statement.

QAA collects personal information from the following:

Visitors to our websites, which include:

- qaa.ac.uk
- qaa.ac.uk/scotland
- accesstohe.ac.uk
- enhancementthemes.ac.uk
- membershipresources.qaa.ac.uk
- step.ac.uk
- qaa.ac.uk/nmc
- the Review Extranet.

Our members

- Staff from QAA Member institutions
- Staff and students from QAA Member institutions who subscribe to membership updates
- Staff and students from QAA Member institutions who attend a QAA event
- Staff and students from QAA Member institutions who contribute to a QAA advisory group or collaborative working group
- Staff and students from QAA Member institutions who access member resources via the Membership Resources Site
- Staff and students from QAA Member institutions who contact us with enquiries related to membership.

Enquirers, visitors survey respondents and interested parties

- People who email QAA or use our contact us forms
- People who telephone QAA
- People who contact QAA via social media
- People who respond to a QAA survey or consultation
- Visitors to QAA offices.

People exercising a statutory right

- People who contact QAA in relation to a data protection subject access request
- People who contact QAA about the processing of their personal data
- People complaining about QAA
- People requesting information in alternative formats.

Our customers

- People who use our services, attend a QAA event or an event we are delivering on behalf of another organisation
- Subscribers to QAA News, Quality Enhancement Newsletter, Membership Update or other marketing campaigns and newsletters
- People who have given us their permission to contact them with information and updates
- People who have given their permission to share their story through a case study in either video or written content.
- People who have given their permission through a testimonial.

We also collect personal data to enable us to carry out our statutory duties or regulatory or other responsibilities. This can include personal data about:

- People submitting Concerns about providers of higher education
- People taking CPD awards offered by QAA
- The staff, governors, associates, students and external examiners at providers of higher education that we review
- Learners registered for an Access to Higher Education Diploma
- Access to Higher Education complaints.

Why we need your data

We process personal information to meet our legal, regulatory, statutory and contractual obligations and to provide you with information, either about our products and services or about matters of public interest. We will not collect any unnecessary personal data from you and will not process your information in any way other than as specified in this notice without telling you first.

How we use your personal data

QAA takes your privacy very seriously and will never disclose, share or sell your data without your knowledge, unless we are required to do so by law. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below:

Members	
Purpose of the processing	To enable QAA to deliver membership services and provide information effectively.
Legal basis of the processing	**GDPR Article 6(1)(b)** performance of a contract Processing is necessary to provide membership benefits so that we can keep you informed about QAA news, membership activities and events. **GDPR Article 6(1)(f)** legitimate interest We use legitimate interest as the lawful basis for processing the data of our members including staff and students of Member institutions.
Categories of personal data collected or processed	Name Job title Email address Telephone number Language preference Photographic, film or video images of individuals Usage and access data relating to how QAA members (name, job title and email address) interact with QAA's online Membership Resources site **Special Category Data** Data concerning disability information or dietary requirements.

Any recipient or categories of recipients of the personal data	QAA uses Intuit Mailchimp and JiscMail (the national academic mailing List service) to conduct some of its mailout communications (such as newsletters) and will share recipients' email addresses with Intuit Mailchimp. QAA uses Salesforce to conduct mailout communications and will share recipients email addresses with Salesforce. Survey respondents' personal details will be processed by the provider of the survey software used to collect their responses. We ensure that the agreements we have in place with such processors contain adequate provisions for the protection of your personal information, and/or that your personal data is only processed in accordance with our written instructions, and you may ask us to see these at any time. QAA's events management software platforms for events are supplied by Cvent Europe Ltd (Cvent). We share the following data with Cvent: Mandatory • Email • First name • Last name • Job title • Institution • GDPR questions • Contact telephone number (only in-person events) Non-mandatory • Address Where we are running an event on behalf of another organisation, we will share the names of delegates attending the event with that organisation. QAA also collects names, email addresses and IP addresses for the purpose of podcasting of membership resources activities. In the course of our operations, we may use generative artificial intelligence tools to assist with data analysis, drafting, summarising, and internal productivity. Specifically, we utilise: • Claude AI (provided by Anthropic) • Microsoft Copilot (provided by Microsoft Corporation) The inputs, prompts, and outputs we submit are not used to train Anthropic's or Microsoft's foundational public models.
Details of transfers to third country and safeguards	We conduct mailout communications using Intuit Mailchimp, a service provided by The Rocket Science Group LLC, a company based in the United States of America. To receive

	QAA News or QAA Membership Updates, your contact information may be transferred to Intuit Mailchimp in the USA. Read Intuit Mailchimp's Privacy Statement along with Mailchimp and European Data Transfers | Mailchimp for details of Intuit Mailchimp's measures for protection of European customer data processed outside of Europe. We also conduct mailout communications using Salesforce, a service provided by Salesforce UK Limited, a company based in Bishopsgate, London. When you sign up to QAA Membership, your contact information may be transferred to Salesforce in the USA. Read Salesforce privacy terms. **Cvent Europe Ltd** Cvent Europe Ltd (Cvent) is a supplier of event management software to QAA. To facilitate Cvent's business practices and delivery of their services, personal data may be collected, accessed from, transferred to or stored in the United States or in other countries where Cvent Europe Ltd operate, including countries outside the European Economic Area (EEA), Switzerland, and UK. Personal data may be accessed by Cvent personnel providing services in any country where they have facilities, or in which they engage third party service providers (processors or subprocessors), including India, Australia and Singapore. Please refer to Cvent's Privacy Notice. **Progress Software Corporation** Progress Sofware Corporation is the supplier of content management software for QAA's online Membership Resources site. Personal data collected in the Progress Software Corporation software is limited to user name, job title, email address along with usage and access data relating to QAA member interactions with the Membership Resources site. Because Progress Software is based in the United States of America, they may have a need to transfer information to the USA. Progress Software Corporation commits to cooperate with the UK Information Commissioner's Office (ICO) and the advice given by such authority with regard to human resources data transferred outside of the EU. The Privacy Policy for Progress Corporation Software is available here. QAA uses the services of Buzzsprout for the hosting of QAA's Membership Podcast resources. Buzzsprout is a company that is based in the United States of America. The Buzzsprout Privacy Policy is available here. Microsoft – for the processing of online surveys. YouTube – for film, video or podcast images of individuals for marketing, training or collaboration purposes.

	Sitefinity Insight for setting up QAA user accounts and passwords. **Artificial Intelligence Services** Anthropic processes data in the United States and protects these transfers with the International Data Transfer Addendum issued by the Information Commissioner, which is used alongside the Standard Contractual Clauses in Anthropic's data processing agreement. Further information is available in the Anthropic Privacy Policy. QAA's Microsoft 365 data, including Copilot history, is stored in the UK. To generate a response, Copilot may process prompts and related data in Microsoft data centres outside the UK, including in the EU and the United States, particularly at busy times. These transfers stay within Microsoft's own services and are protected by the safeguards in Microsoft's Data Protection Addendum. Further information is available in the Microsoft Privacy Statement.
The source of the personal data	Provided by the data subject or their authorised representative.
Retention period	Membership institution – life of membership institution. Inactive contacts – 3 years. Event delegates – 2 years. Any special category data such as dietary requirements or disability information is deleted as soon as the event has ended. Podcasts through the Buzzsprout platform – 5 years. Photographic, film, video or podcast images that are published or printed in hard copy are retained on a permanent basis. All other photographic, film, video or podcast images are retained for 3 years from end of use. Online Surveys – 12 months. YouTube – as specified on the consent form. Artificial Intelligence Services - Data processed via Claude AI and Microsoft Copilot is retained in alignment with QAA's Retention Schedule.
Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data	Processing is necessary as part of an institution's Membership Agreement. If you do not provide us with your personal data, we may not be able to fulfil our membership obligations to you.

The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.	None. QAA does not use AI tools for automated decision making.

Enquirers, visitors, survey respondents and interested parties	
Purpose of the processing	To respond to enquiries from the public, provide services, inform our products and services and ensure the safety of our visitors.
Legal basis of the processing	**GDPR Article 6(1)(f)** legitimate interest Processing is necessary for the purposes of providing information to the public; responding to enquiries from individuals; recording these responses; providing consistent and accurate information and advice; ensuring the personal safety of individuals attending our premises.
Categories of personal data collected or processed	Name Address Job title Personal email address Employer Telephone number Language preference Business email Car registration (visitors) Proof of identity for subject access requests Personal data that a data subject forwards to QAA when raising an enquiry.
Any recipient or categories of recipients of the personal data	We do not share the personal details of enquirers. Survey respondents' personal details will be processed by the provider of the survey software used to collect their responses. We ensure that the agreements we have in place with such processors contain adequate provisions for the protection of your personal information, and/or that your personal data is only processed in accordance with our written instructions, and you may ask us to see these at any time. QAA uses Intuit Mailchimp to conduct some of its mailout communications (such as newsletters) and will share recipients' email addresses with Intuit Mailchimp. We will share visitors' details with the reception provider at our QAA office. QAA also collects names, email addresses and IP addresses for the purpose of podcasting of membership resources activities. In the course of our operations, we may use generative artificial intelligence tools to assist with data analysis, drafting, summarising, and internal productivity. Specifically, we utilise:

	• Claude AI (provided by Anthropic) • Microsoft Copilot (provided by Microsoft Corporation) The inputs, prompts, and outputs we submit are not used to train Anthropic's or Microsoft's foundational public models.
Details of transfers to third country and safeguards	We conduct mailout communications using Intuit Mailchimp, a service provided by The Rocket Science Group LLC, a company based in the United States of America. When you sign up to receive QAA News and the Quality Enhancement Newsletter your contact information may be transferred to Intuit Mailchimp in the USA. Read Intuit Mailchimp's Privacy Statement along with Mailchimp and European Data Transfers | Mailchimp for details of Intuit Mailchimp's measures for protection of European customer data processed outside of Europe. Microsoft – for the processing of online surveys. YouTube – for film, video or podcast images of individuals for marketing, training or collaboration purposes. **Artificial Intelligence Services** Anthropic processes data in the United States and protects these transfers with the International Data Transfer Addendum issued by the Information Commissioner, which is used alongside the Standard Contractual Clauses in Anthropic's data processing agreement. Further information is available in the Anthropic Privacy Policy. QAA's Microsoft 365 data, including Copilot history, is stored in the UK. To generate a response, Copilot may process prompts and related data in Microsoft data centres outside the UK, including in the EU and the United States, particularly at busy times. These transfers stay within Microsoft's own services and are protected by the safeguards in Microsoft's Data Protection Addendum. Further information is available in the Microsoft Privacy Statement.
The source of the personal data	Provided by data subject or their authorised representative.
Retention period	Personal data of enquirers – 12 months for general enquiries and enquiries related to Reviews in England, Reviews in Scotland, Wales and Northern Ireland, activities in Europe, Assurance Services, Events,

	Finance and Accreditation, International & Professional Services. Personal data of enquirers – 3 years for enquiries to Membership and Access to HE. Online Surveys – 12 months. YouTube – as specified on the consent form. Artificial Intelligence Services - Data processed via Claude AI and Microsoft Copilot is retained in alignment with QAA's Retention Schedule.
Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data	The provision of personal information may be part of a contractual requirement if you are visiting our offices on behalf of a supplier. Provision of personal information may also be a statutory requirement, as it will enable us to discharge our health and safety duties to people attending our offices. In such cases, if you do not provide us with your information, you may be refused entry to our premises.
The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.	None. QAA does not use AI tools for automated decision making.

People exercising a statutory right	
Purpose of the processing	To give effect to the individual's statutory right, for example: • right to access information by using our information request procedure • right to access information by making a subject access request • right to be forgotten • right to rectification • right to restrict processing.
Legal basis of the processing	**GDPR Article 6(1)(c)** Compliance with a legal obligation.
Categories of personal data collected or processed	Name Personal address Personal email address Telephone number Business email address Form of identification (where required)

Any recipient or categories of recipients of the personal data	We will only share your data where we are required to do so by law, or by the Information Commissioner's Office. In the course of our operations, we may use generative artificial intelligence tools to assist with data analysis, drafting, summarising, and internal productivity. Specifically, we utilise: • Claude AI (provided by Anthropic) • Microsoft Copilot (provided by Microsoft Corporation) The inputs, prompts, and outputs we submit are not used to train Anthropic's or Microsoft's foundational public models
Details of transfers to third country and safeguards.	**Artificial Intelligence Services** Anthropic processes data in the United States and protects these transfers with the International Data Transfer Addendum issued by the Information Commissioner, which is used alongside the Standard Contractual Clauses in Anthropic's data processing agreement. Further information is available in the Anthropic Privacy Policy. QAA's Microsoft 365 data, including Copilot history, is stored in the UK. To generate a response, Copilot may process prompts and related data in Microsoft data centres outside the UK, including in the EU and the United States, particularly at busy times. These transfers stay within Microsoft's own services and are protected by the safeguards in Microsoft's Data Protection Addendum. Further information is available in the Microsoft Privacy Statement. Anthropic processes data in the United States and protects these transfers with the International Data Transfer Addendum issued by the Information Commissioner, which is used alongside the Standard Contractual Clauses in Anthropic's data processing agreement. Further information is available in the Anthropic Privacy Policy. QAA's Microsoft 365 data, including Copilot history, is stored in the UK. To generate a response, Copilot may process prompts and related data in Microsoft data centres outside the UK, including in the EU and the United States, particularly at busy times. These transfers stay within Microsoft's own services and are protected by the safeguards in Microsoft's Data Protection Addendum. Further information is available in the Microsoft Privacy Statement.
The source of the personal data	Provided by the individual.

Retention period	Up to 3 years from closure of request. Data processed via Claude AI and Microsoft Copilot is retained in alignment with QAA's Retention Schedule.
Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data	The provision of data is part of a statutory requirement. If you do not provide us with your data, we may not be able to give you the information you request, unless it is already available in the public domain.
The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.	None. QAA does not use AI tools for automated decision making.

Our customers and international partners	
Purpose of the processing	To enable QAA to deliver services and provide information effectively.
Legal basis of the processing	**GDPR Article 6(1)(b)** Performance of a contract.
Categories of personal data collected or processed	Name Personal email Business email Telephone number Language Preference **Special Category Data** Data concerning disability information or dietary requirements.
Any recipient or categories of recipients of the personal data	QAA uses Intuit Mailchimp and JiscMail to conduct mailout communications and will share recipients' email addresses with Intuit Mailchimp and JiscMail. For events where fees are payable to QAA, payments are collected via PayPal. To complete the transaction, QAA will access personal data, such as name and email address. QAA's supplier of events management software is Cvent Europe Ltd (Cvent). In the course of our operations, we may use generative artificial intelligence tools to assist with data analysis, drafting, summarising, and internal productivity. Specifically, we utilise:

	• Claude AI (provided by Anthropic) • Microsoft Copilot (provided by Microsoft Corporation) The inputs, prompts, and outputs we submit are not used to train Anthropic's or Microsoft's foundational public models
Details of transfers to third country and safeguards	We conduct **mailout communications** using Intuit Mailchimp, a service provided by The Rocket Science Group LLC, a company based in the United States of America. When you sign up to receive QAA News or the Quality Enhancement Newsletter, your contact information may be transferred to Mailchimp in the USA. Read Intuit Mailchimp's Privacy Statement along with Mailchimp and European Data Transfers | Mailchimp for details of Intuit Mailchimp's measures for protection of European customer data processed outside of Europe. For event payments, we may access personal data relating to transactions via PayPal. PayPal operates in many countries and may move data outside of the EU. PayPal use third-party service providers to process and store information in the United States and other countries. PayPal has taken specific steps, in accordance with EU and UK data protection laws, to protect personal data. The PayPal Privacy Statement provides further information about international transfers of personal data. **Cvent Europe Ltd** Cvent Europe Ltd (Cvent) is a supplier of event management software to QAA. To facilitate Cvent's business practices and delivery of their services, personal data may be collected, accessed from, transferred to or stored in the United States or in other countries where Cvent Europe Ltd operate, including countries outside the European Economic Area (EEA), Switzerland, and UK. Personal data may be accessed by Cvent personnel providing services in any country where they have facilities, or in which they engage third party service providers (processors or subprocessors), including India, Australia and Singapore. Please refer to Cvent's Privacy Notice. Microsoft – for the processing of online surveys. YouTube – for film, video or podcast images of individuals for marketing, training or collaboration purposes. **Artificial Intelligence Services** Anthropic processes data in the United States and protects these transfers with the International Data Transfer Addendum issued by the Information Commissioner, which is used alongside the Standard

	Contractual Clauses in Anthropic's data processing agreement. Further information is available in the Anthropic Privacy Policy. QAA's Microsoft 365 data, including Copilot history, is stored in the UK. To generate a response, Copilot may process prompts and related data in Microsoft data centres outside the UK, including in the EU and the United States, particularly at busy times. These transfers stay within Microsoft's own services and are protected by the safeguards in Microsoft's Data Protection Addendum. Further information is available in the Microsoft Privacy Statement.
The source of the personal data	Provided by the individual or by his/her authorised representative.
Retention period	6 years from completion of the contract. Event delegates – 2 years. Any special category data such as dietary requirements or disability information is deleted as soon as the event has ended. PayPal – 6 years plus current year from payment date. Online Surveys – 12 months. YouTube – as specified on the consent form. Data processed via Claude AI and Microsoft Copilot is retained in alignment with QAA's Retention Schedule.
Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data	The provision of personal information may be part of a contractual requirement if you are visiting our offices on behalf of a supplier. Not providing us with your information may lead to you being refused entry to our premises.
The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.	None. QAA does not use AI tools for automated decision making.

Personal data collected in the course of our statutory duties or regulatory Responsibilities	
Purpose of the processing	To safeguard the standards and quality of UK higher education wherever it is delivered around the world.

Legal basis of the processing	**GDPR Article 6(1)(e)** Public interest or exercise of official authority. **GDPR Article 6(1)(f)** Legitimate interest Processing is necessary for the purposes of QAA's legitimate interest in standards and quality assurance. Processing may be necessary for the purposes of preventing fraud.
Categories of personal data collected or processed	Name Personal email address Telephone number Address Business email Job title Employment history and professional experience Attendance information Academic grades Language preference Language competency Right to work/study Photographic, film, video or podcast images of individuals. **Special Category Data** Nationality ethnicity Disability information.
Any recipient or categories of recipients of the personal data	We may share information obtained in the course of our review or other activity with other bodies, including: • the Department for Education • the Student Loan Company • the Office for Students • the Higher Education Statistics Agency • the Scottish Funding Council • the Higher Education Funding Council for Wales • the Department for the Economy Northern Ireland • the Department of Agriculture, Environment and Rural Affairs Northern Ireland. Any personal information shared in this context will only be shared, if necessary, to give effect to the intention of the sharing. Information sharing is normally covered by an information sharing or non-disclosure agreement. In the course of our operations, we may use generative artificial intelligence tools to assist with data analysis, drafting, summarising, and internal productivity. Specifically, we utilise: • Claude AI (provided by Anthropic) • Microsoft Copilot (provided by Microsoft Corporation) The inputs, prompts, and outputs we submit are not used to train Anthropic’s or Microsoft’s foundational public models

Details of transfers to third country and safeguards	**Artificial Intelligence Services** Anthropic processes data in the United States and protects these transfers with the International Data Transfer Addendum issued by the Information Commissioner, which is used alongside the Standard Contractual Clauses in Anthropic's data processing agreement. Further information is available in the Anthropic Privacy Policy. QAA's Microsoft 365 data, including Copilot history, is stored in the UK. To generate a response, Copilot may process prompts and related data in Microsoft data centres outside the UK, including in the EU and the United States, particularly at busy times. These transfers stay within Microsoft's own services and are protected by the safeguards in Microsoft's Data Protection Addendum. Further information is available in the Microsoft Privacy Statement.
The source of the personal data	Provided by data subject or their authorised representative. Collected in the course of QAA Review.
Retention period	Any personal information gathered during the course of these activities is securely deleted and/or destroyed 3 months after publication of review report to which it relates. Photographic, film, video or podcast images that are published or printed in hard copy are retained on a permanent basis. All other photographic, film, video or podcast images are retained for 3 years from end of use. Data processed via Claude AI and Microsoft Copilot is retained in alignment with QAA's Retention Schedule.
Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data	Processing is necessary for the performance of our statutory and regulatory duties. Failure to provide data compromises QAA's ability to complete the necessary review.
The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.	None. QAA does not use AI tools for automated decision making.

Personal data collected in the course of our statutory and regulatory responsibilities for Learners registered for an Access to Higher Education Diploma	
Purpose of the processing	To monitor learner registration, achievement and awards across approved Access to Higher Education programmes.

	To monitor the success of Access Validating Agencies' strategies to promote equality of opportunity between people of different ethnic or racial backgrounds, or different states of physical or mental health. To feed into QAA annual publications on Access to Higher Education participation and achievement. Processing may be necessary for the purposes of preventing fraud.
Legal basis of the processing	**GDPR Article 6(1)(e)** Public interest or exercise of official authority.
Categories of personal data collected or processed	Student name Date of birth Age Unique Learner Number Learner Reference Post code Achievement data Grade information Transcript Qualification information Destination Source of funding/funding status Benefit status Employment/prior employment status Language competency Language preference Photographic, film, video or podcast images of individuals Case studies and testimonials for Access to HE profile interviews. **Special Category Data** Ethnicity Gender Disability information Learning Difficulty information.
Any recipient or categories of recipients of the personal data	QAA uses Salesforce to conduct mailout communications and will share recipients email addresses with Salesforce. Survey respondents' personal details will be processed by the provider of the survey software used to collect their responses. We ensure that the agreements we have in place with such processors contain adequate provisions for the protection of your personal information, and/or that your personal data is only processed in accordance with our written instructions, and you may ask us to see these at any time.

	QAA's events platform suppliers are Cvent Europe Ltd (Cvent). Data collected by QAA's events platform suppliers is as follows: **Mandatory** • Email • First name • Last name • Job title • Institution • GDPR questions • Contact telephone number (only in-person events) **Non-mandatory** • Address. In the course of our operations, we may use generative artificial intelligence tools to assist with data analysis, drafting, summarising, and internal productivity. Specifically, we utilise: • Claude AI (provided by Anthropic) • Microsoft Copilot (provided by Microsoft Corporation) The inputs, prompts, and outputs we submit are not used to train Anthropic's or Microsoft's foundational public models.
Details of transfer to third country and safeguards	We conduct mailout communications using Salesforce, a service provided by Salesforce UK Limited, a company based in Bishopsgate, London. When you sign up to QAA Membership, your contact information may be transferred to Salesforce in the USA. Read Salesforce privacy terms. **Cvent Europe Ltd** Cvent Europe Ltd (Cvent) is a supplier of event management software to QAA. To facilitate Cvent's business practices and delivery of their services, personal data may be collected, accessed from, transferred to or stored in the United States or in other countries where Cvent Europe Ltd operate, including countries outside the European Economic Area (EEA), Switzerland, and UK. Personal data may be accessed by Cvent personnel providing services in any country where they have facilities, or in which they engage third party service providers (processors or subprocessors), including India, Australia and Singapore. Please refer to Cvent's Privacy Notice. **Artificial Intelligence Services** Anthropic processes data in the United States and protects these transfers with the International Data Transfer Addendum issued by the Information Commissioner, which is used alongside the Standard Contractual Clauses in Anthropic's data processing agreement. Further information is available in the Anthropic Privacy Policy.

	QAA's Microsoft 365 data, including Copilot history, is stored in the UK. To generate a response, Copilot may process prompts and related data in Microsoft data centres outside the UK, including in the EU and the United States, particularly at busy times. These transfers stay within Microsoft's own services and are protected by the safeguards in Microsoft's Data Protection Addendum. Further information is available in the Microsoft Privacy Statement.
The source of the personal data	Provided by Education and Skills Funding Agency, Department for Education. QAA-licensed Access Validating Agencies Providers that are registered on the UK Register of Learning Providers.
Retention period	Maximum 12 months from receipt, or on completion of purpose. Photographic, film, video or podcast images that are published or printed in hard copy are retained on a permanent basis. All other photographic, film or video images are retained for 3 years from end of use. Access to HE profile interviews that are published or printed in hard copy are retained on a permanent basis. All other Access to HE profile interviews for 3 years from end of use. Data processed via Claude AI and Microsoft Copilot is retained in alignment with QAA's Retention Schedule.
Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data	Processing is necessary for the performance of our statutory and regulatory duties. Failure to provide data compromises QAA's ability to complete the necessary review.
The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.	None. QAA does not use AI tools for automated decision making.

Retention of your personal data

We retain your personal information in accordance with the GDPR, which obliges us to keep it only for as long as is necessary. QAA has policy on information retention. If we do not have any requirement to retain personal information for business, regulatory, or legal reasons, we will delete.

Use of Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, remember your individual settings and preferences, and to measure how you use websites to ensure they meet your needs.

Details about which cookies QAA uses, why we use them and what you need to do if you do not wish to accept some or all of them are available in QAA's Cookies Statement.

How we protect your personal data?

We have appropriate security measures in place to prevent personal data from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

User interaction data collected through Microsoft Clarity data is anonymised. Personally identifiable information is automatically redacted.

Your rights

If QAA processes personal information about you, including any data processed with the assistance of AI tools, you have the right to access that information, and to request information about the following under data protection law:

- what personal data we hold about you
- the purposes of the processing
- the categories of personal data concerned
- the recipients to whom the personal data has/will be disclosed
- how long we intend to store your personal data for
- if we did not collect the data directly from you, information about the source.

In some cases, if you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You may also have the right to request erasure of your personal data or the right to restrict processing (where applicable) in accordance with data protection law; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

To **exercise** any of these rights, you can do so by contacting us:

- By email: governance@qaa.ac.uk

- By telephone: +00 44 (0) 1452 557000 (voicemail only)

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Making a complaint

QAA only processes your personal information in compliance with this Privacy Notice and in accordance with the relevant data protection laws. If you have any concerns about how we handle your personal data, or if you believe we have not complied with data protection laws, you have the right to raise a complaint.

Contact Us First
We encourage you to contact us directly so we can investigate and resolve your concerns as quickly as possible. You do not need to use any specific legal language or formal forms to raise concerns with us. Please submit your complaint to our Governance Team by emailing Governance@qaa.ac.uk

What to Expect from Our Process
When you submit a data protection complaint, we will handle it in accordance with our Complaints Procedure.

Your Right to Escalate
If you are not satisfied with our response, or if you believe we are processing your personal data unlawfully, you have the right to make a complaint directly with the supervisory authority. In the UK, this is the Information Commissioners Office (ICO).

You can contact them using the details below:
- Website: https://ico.org.uk/make-a-complaint/
- Helpline: 0303 123 1113
- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Published November 2026

© The Quality Assurance Agency for Higher Education 2026
Southgate House, Southgate Street, Gloucester GL1 1UB
Registered charity numbers 1062746 and SC037786
Web: www.qaa.ac.uk