

Notice for Applicants from the European Economic Area

1. What is the purpose of this document?

The Hong Kong Polytechnic University (the “University”) is committed to protecting the privacy and security of your personal information. This notice describes how we collect and use your personal data during the application for admission process in accordance with the General Data Protection Regulation (“GDPR”). The University is the “data controller” for the information that we obtain from you or others as a result of your application for undergraduate or postgraduate study.

2. Glossary

In this policy, your “personal data” means any recorded information that is about you and from which you can be identified. It does not include data where your identity has been removed (anonymous data). “Processing” of your personal data means anything that we do with that information, including collection, use, storage, disclosure, deletion or retention.

3. The types of data we hold about you

The information we hold about you may include the following:

- Personal details such as name, title, address, telephone number, email address, date of birth, sex and gender;
- Education and employment information;
- Visa, passport and immigration information;
- Funding and financial support information.

We may also process the following "special categories" of more sensitive personal data:

- Information about your race or ethnicity;
- Information about your health, including any disability and/or medical condition;
- Information about criminal convictions and offences (if applicable to your course).

Special category data will not be used to assess your application and will only be used in accordance with section 6.

4. How did the University obtain your data

Most of the information we hold comes from your application, for example, via www.polyu.edu.hk. We may also collect additional information directly from you and from other parties, such as your current or former school(s), referees, and government departments and agencies.

5. How the University uses your data

We process your data for the purpose of processing and assessing your application for study, and for purposes related to your application, such as assessing your eligibility for funding and your financial status. Access to your data will be provided to our staff who need to view it as part of their work in carrying out the purposes. We set out below examples of circumstances where it is necessary for us to process your data. We may use the same information under more than one circumstances.

(i) To consider your application

We also need to process data under this heading where the University is working with a third party in order to offer you services, for example, those offered by the colleges or scholarship benefactors. See section 7 on third party sharing.

(ii) To comply with a legal obligation

Information processed for this purpose includes, but is not limited to, information relating to the monitoring of equal opportunities. We are also required by law to provide data to various Government departments, such as immigration, visa.

(iii) To meet our legitimate interests

We also need to process your data in order to meet our legitimate interests or the legitimate interests of others. For example:

- asking you to provide additional information on your application;
- notifying you of changes to course information; and
- inviting you to take part in applicant surveys or enabling third parties to conduct applicant surveys on our behalf.

If you fail to provide personal information under 5(i) or 5(ii) above

If you fail to provide certain information when requested under the circumstances described in 5(i) and 5(ii) above, we may not be able to meet our contractual obligation to consider your application or to comply with our other legal obligations.

Change of purpose

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

Please note that we may process your data without your knowledge or consent where this is required or permitted by law.

6. Special category data

Special category data require a higher level of protection. Listed below are examples of processing activities that we regularly undertake in respect of these types of data. In addition to the activities listed below, it may sometimes be necessary to process this sort of information for exceptional reasons, for example, because it is necessary to protect your vital interests or those of another person.

- **Disability**

We will process data you have volunteered about any disability in order to make any arrangements or adjustments required in relation to your application (e.g. to arrange access for interviews) and/or to monitor equal opportunities.

7. Data sharing with third parties

In order to perform our contractual and other legal responsibilities or purposes, we may, where relevant and necessary, need to share your information with the following types of organisation:

- Your referees;
- The governmental departments or agencies responsible for immigration and study visa;
- Sponsors or benefactors of funding and financial support;

Where information is shared with third parties, we will seek to share the minimum amount necessary.

All third-party service providers that process data on our behalf are required to take appropriate security measures to protect your data in line with our policies. We do not allow them to use your data for their own purposes. We permit them to process your data only for specified purposes and in accordance with our instructions.

8. Retention Period

We will retain your data only for as long as we need it to meet our purposes, including any relating to legal, accounting, or reporting requirements.

9. Your rights

Under certain circumstances, by law you have the right to:

- **Request access** to your data (commonly known as a “subject access request”). This enables you to receive a copy of your data and to check that we are lawfully processing it.
- **Request correction** of your data. This enables you to ask us to correct any incomplete or inaccurate data we hold about you.
- **Request erasure** of your data. This enables you to ask us to delete or remove your data in certain circumstances, for example, if you consider that there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).
- **Object to processing** of your data where we are relying on our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your data for direct marketing purposes.
- **Request the restriction of processing** of your data. This enables you to ask us to suspend the processing of your data, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your data to another party.

Depending on the circumstances and the nature of your request it may not be possible for us to do what you have asked, for example, where there is a statutory or contractual requirement for us to process your data and it would not be possible to fulfil our legal obligations if we were to stop. Where you have consented to the processing (for example, by asking us to send you certain types of communication), you can withdraw your consent at any time, by emailing us at asintl@polyu.edu.hk. Upon your withdrawal of the consent, we will stop the processing as soon as we can. The withdrawal will not invalidate past processing.

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, please email the Academic Secretariat of the University at asintl@polyu.edu.hk. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

10. Keeping your data up-to-date

It is important that the data we hold about you is accurate and current. You can access, amend and delete your data yourself until the point at which you submit your application to the University. Please keep us informed of any changes after you submit your application.

11. Changes to this privacy policy

We reserve the right to update this privacy policy at any time, and will seek to inform you of substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.