

Privacy Notice

Francis James Limited customer privacy notice

Francis James is committed to respecting privacy and protecting personal data. We have certain responsibilities in accordance with data protection laws, and the aim of this notice is to confirm how we collect, use and share personal data. Francis James acts as the data controller, as defined by the UK General Data Protection Regulation, for any personal data provided to it as a provider of higher education.

Francis James is registered with the Information Commissioner's Office, with Data Protection Registration Certificate reference ZB695213. This registration will be due for renewal on or before 29 May 2026.

Contact details

You can contact Francis James directly by telephone or email.
Telephone: 0203 916 5140 Email: info@francisjames.org

What information we collect, use, and why

We may collect or use the following types of information for the purposes of services relating to learner education and welfare:

- Names and contact details for learners
- Gender
- Pronoun preferences
- Date of birth
- Next of kin and emergency contact information
- Payment details and financial information including transactions
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)
- Attendance and reason for absence data
- Account access information
- Exam results and qualifications
- Progress reports
- Information relating to compliments and complaints
- Exclusion, suspension and behavioural information
- Right to work information.

We may also collect or use the following special category information. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin

- Religious or philosophical beliefs
- Health information
- Sexual orientation information.

We may collect or use the following information for disciplinary investigations or in response to requests from certain third parties such as law enforcement agencies:

- Names and contact details for learners
- Gender
- Pronoun preferences
- Special Educational Needs and Disabilities (SEND) information (includes reasonable adjustments and special educational needs and disabilities)
- Attendance and reason for absence data
- Witness statements and contact details
- Records and reports
- Call/video call recordings.

We may collect or use the following personal information for dealing with queries, complaints or appeals:

- Names and contact details
- Addresses
- Payment details
- Account login or user information
- Purchase or service history
- Call/video call recordings
- Relevant information from previous investigations
- Correspondence
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities).

We may collect or use the following information for information updates or marketing purposes:

- Names and contact details
- Addresses
- Marketing preferences
- Website and app user journey information
- Records of consent, where appropriate.

Lawful bases and data protection rights

Under UK data protection law, we must have a 'lawful basis' for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on [the website of the Information Commissioner's Office](#).

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- Your right of access - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- Your right to rectification - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- Your right to erasure - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- Your right to restriction of processing - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- Your right to object to processing - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information for learner education and welfare are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for disciplinary investigations or in response to requests from certain third parties such as law enforcement agencies are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information for dealing with queries, complaints or appeals are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information for information updates or marketing purposes are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Where we get personal information from

- Directly from you
- Other education establishments
- Employers

How long we keep information

The Data Protection principles stipulate that personal data must only be used for the purposes for which it was lawfully obtained and kept for no longer than necessary. If personal data is retained, a clear justification for doing so must be made and a record kept of the justification in each case.

A schedule for how long we retain any personal data is available on the [Francis James website](#).

Who we share information with

Named data processors

- Moodle Pty Ltd - acts as data processor for Francis James Limited who use Moodle's hosted (cloud) service for our virtual learning environment. Francis James determines the content of Moodle, and which data is collected, while Moodle Pty Ltd processes the data on behalf of Francis James' following our instructions.
- Google LLC – acts as a data processor for Francis James Limited, providing our cloud-based productivity and email services through Google Workspace. Francis James Limited determines the information stored or shared within Google Workspace and the purposes for which personal data is processed, while Google

processes this data on our behalf in accordance with the Google Cloud Data Processing Addendum and UK GDPR requirements.

Others we share personal information with

Other relevant third parties:

- Francis James Limited shares limited information about individual learner performance with Richmond American University London for the purpose of awarding and progression decisions., Richmond American University London validates the degree programme offered by Francis James Limited and has oversight of standards.

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Written By	Revision Date	Revision Number	Approved By	Review Date
H Barratt	27/10/2025	1	 S Graham	27/10/2026

