



HOLMES UNIVERSITY FLORIDA

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PD17 – Privacy Notice (Students)

Policy Code	PD17
Policy Title	Privacy Notice (Students)
Domain	B – Data Protection
Internal Ref	B.17
Jurisdiction	Florida, United States – Holmes University Florida (HUF)
Version	1.1
Policy Owner	Director of Risk and Compliance, Holmes University Florida
Approved By	Holmes University Florida Board of Directors

1. Related Policies

- PD16 – Privacy and Data Protection Policy (Florida)
- PD54 – Records Access Request Policy (Florida)
- PD57 – CCTV Policy (Florida)
- PD44 – Records Management (Florida)

2. Introduction

- 2.1** This Privacy Notice concerns the handling of personal information of past, present and prospective students of Holmes University Florida ("HUF", "us" or "we"). It explains how HUF collects, uses and shares your personal information, and your rights in relation to the personal information we hold about you. Personal information includes information relating to an individual who can be identified, directly or indirectly, from that information alone or in combination with other information. HUF handles education records in accordance with the Family Educational Rights and Privacy Act (FERPA), maintains the security of personal information consistent with the Florida Information Protection Act (FIPA), and, where applicable, the Gramm-Leach-Bliley Act (GLBA). Further detail on how we handle data and the related complaints process is set out in our Privacy and Data Protection Policy (PD16). Should you require any further information or wish to raise any queries about this policy, or your privacy rights, please message: florida@holmeseducation.group

3. How Your Data Is Collected and Kept Secure

- 3.1** We may collect your personal information in a number of ways: from information you provide before you apply (for example, when you express an interest in studying at HUF); when you apply to study and complete application forms via our website or another admissions process, and when you complete admissions and immigration-compliance processes; when you communicate

with us by telephone, email or via our website; as you interact with us during your time as a student; from your answers to surveys and questionnaires; and from third parties, for example your agent, or a previous or current school, college, university or employer who provides a reference or sponsors your studies. HUF maintains documents - including the Privacy and Data Protection Policy - that set out how we keep your personal information secure and prevent unauthorized access or disclosure. Third parties with whom we share your information are obliged to keep it secure, and we do not engage third parties unless we are satisfied they will do so.

4. Categories of Data Collected

- 4.1** We may collect the following types of personal information: your current and previous name(s) and contact information (residential address, email and phone), date of birth, age, gender, passport or government identification details, country of domicile and nationality; if you are an international student, your immigration status and F-1/SEVIS information; imagery (video and/or audio) recorded through CCTV or other capture on our premises, and imagery recorded through electronic platforms; information about your education and employment history (schools, colleges and universities attended, places worked, courses completed, dates of study and results); records of coursework assessments, examinations, predicted and actual grades and other student-record information; immigration information, which for international students may also be obtained through SEVIS; information about your family or personal circumstances and academic and extracurricular interests, where relevant to appropriate pastoral care; financial information relating to tuition and other charges, scholarships, payments and outstanding balances, and (where relevant) living costs and source of funds; course information and academic performance; attendance and progression; awards; and records of any breach of our policies, such as academic or other misconduct.
- 4.2** Some of this information is more sensitive - for example, information revealing racial or ethnic origin, religious or philosophical beliefs, genetic or biometric data (where used for identification), health information, or information concerning sexual orientation. HUF recognizes that a compromise of such sensitive personal information is likely to cause greater harm or distress, and therefore gives it additional protection, consistent with FIPA. We also process contact and educational details after you cease being a student, in order to maintain your academic record and offer alumni services.

5. How and Why We Use Your Data

- 5.1** Data collected is held securely in your electronic student file and/or hard-copy file, with access controlled and limited to staff who have an operational need. The purposes for which HUF uses your data include: processing your application (which may include seeking confirmation of declared qualifications from other institutions); enrolling you and maintaining your student record; recording academic progress; processing survey results to improve services, performance and teaching (you may opt out of surveys); administering the financial aspects of your studies; providing facilities and services during and after your studies as part of HUF's legitimate business, including pastoral care; sharing limited data with the Student Council; sharing data with internal or external auditors to check the integrity of our data and processes; sharing data with partners, agents, other agencies and public bodies, including technology suppliers such as our hosting provider; submitting reports and statistics to government organizations and third parties to fulfil our statutory and legal obligations; monitoring equal opportunity; safeguarding and promoting

the welfare of students; and offering alumni services. For international students in F-1 status, HUF maintains records relating to immigration status, enrollment and program completion and reports to the Student and Exchange Visitor Program (SEVP) through SEVIS as required, including ongoing engagement. Where we are legally required to disclose information (for example, to comply with a subpoena, court order or statutory reporting obligation), we will do so; where information is transferred to a third party or service provider, we put in place appropriate safeguards, such as contractual clauses requiring equivalent protection.

6. Attendance Monitoring, Sharing and Retention

- 6.1** Students enrolling on a course agree to have their attendance and engagement monitored, and to the use of that data for intervention and reporting purposes, because HUF has a duty of care to follow up promptly on non-attendance and non-engagement so that students can be supported, and because HUF may be obliged to comply with the requirements of government bodies and external agencies (including SEVP for F-1 students). Except for sharing with the third parties described above, we do not share your data with other third parties where it is not necessary for the reasons stated or otherwise permitted or required by law. HUF may retain your personal information for a period of years after you complete your course (in accordance with the Records Management Policy, PD44); certain information may be retained indefinitely to maintain your academic record and respond to enquiries, including your name, date of birth, student ID, grades and achievement, financial history, and immigration history.

7. Your Rights under FERPA

- 7.1** Under FERPA, you have: the right to inspect and review your education records within the period required by law after HUF receives a request for access; the right to request the amendment of records you believe are inaccurate, misleading or in violation of your privacy rights, and, if HUF declines, the right to a hearing and to place a statement in the record; the right to provide written consent before HUF discloses personally identifiable information from your education records, except to the extent that FERPA authorizes disclosure without consent (for example, to school officials with a legitimate educational interest, or in response to a lawful subpoena or health-and-safety emergency); and the right to file a complaint with the U.S. Department of Education concerning an alleged failure by HUF to comply with FERPA. HUF may disclose "directory information" unless you opt out in accordance with the Privacy and Data Protection Policy. Requests to inspect, review or amend records are handled under the Records Access Request Policy (PD54).

8. Contact and Review

- 8.1** If you have any queries about this Privacy Notice or the Privacy and Data Protection Policy: florida@holmeseducation.group, or wish to request access to the personal information we hold about you, you can contact the Director of Risk and Compliance (Privacy Officer) by the email above, telephone or by posting the request by registered post to HUF's address. This Privacy Notice is reviewed annually and may be updated from time to time in line with changes in legal requirements.

Document Control

Prepared by	Director of Risk and Compliance, Holmes University Florida
Risk and Compliance Review Date	14 July 2026
Board of Directors Review Date	21 August 2026
Board of Directors Approval Date	21 August 2026
Policy Implementation Date	21 August 2026
Policy Review Date	21 August 2029