

# London Business School

## Executive Education Privacy Statement

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### 1. Definitions and Interpretation

#### (a) Executive Education Data Controllers:

- (i) **London Business School** and our registration number in the Data Protection Register is Z8182937
  - (ii) **Centre for Management Development Company Limited** and our registration number in the Data Protection Register is Z5489289.
- (b) When saying “**we**” or “**our**”, we are jointly referring to London Business School and Centre for Management Development Company Limited.
- (c) Our **registered office** is: London Business School, Sussex Place, Regent’s Park, London, NW1 4SA, United Kingdom

### 2. Introduction

The Executive Education Department at London Business School (“LBS”) take the responsibility of protecting your privacy and personal data seriously, and have in place reasonable physical, technical and administrative safeguards designed to prevent unauthorized access to or use of your information.

This Privacy Statement explains how we process (‘collect’, ‘use’, ‘share’ ‘disclose’, ‘dispose of’ and ‘safeguard’) personal information that you or your employer provides to us or is generated by us through your access to and use of our Executive Education Programmes. This privacy notice also covers how we process your data through your donations as an Alumnus or other life-long friend of the School, as defined as data subjects under the Data Protection Act. It also addresses your rights in relation to the personal data we hold.

*This policy does not cover information collected via our London Business School website and online services. For a copy of our Website Privacy Policy, please visit: <https://www.london.edu/about/policies-and-legislation/privacy-policy>*

### 3. Who is London Business School and Centre for Management Development Company Limited?

**London Business School** is a charitable organisation and graduate business school established in the UK by Royal Charter (RC 000721). Founded in 1964, LBS are a member institution of the University of London.

**Centre for Management Development Company Limited** at London Business School is a wholly owned subsidiary of the London Business School Anniversary Trust. CMD is a private limited company incorporated in England and Wales with the Registrar of Companies for England and Wales in 1975 under company number 1202058. CMD is a trading company than runs company specific courses and educational programmes using facilities at London Business School. The principal activity of CMD at London Business School is the advancement of education in the field of business studies, and in particular, CMD at London Business School provides commercial organisations and education institutions with business courses to meet their specific requirements.

### 4. What services does the Executive Education Department at London Business School deliver?

The Executive Education Department is responsible for inspiring learning solutions through enabling effective organisational change. We deliver 3 types of Programmes:

- **Open Programmes** – Through our Open Programmes, our Clients can strategically match our open programmes to individuals or groups of employees across their organisation to amplify business impact.

If you are accessing an Executive Education Open Enrolment Programme, this will be provided by London Business School.

- **Custom Programmes** - for a completely tailored solution, we consult and collaborate with our Clients to get to the heart of their company and deliver a Programme that meet their specific requirements.

If you are accessing an Executive Education Custom Programme, this will be provided by Centre for Management Development Company Limited at London Business School. Information that you share with Centre for Management Development Company Limited may be shared with London Business School in order to fulfil our contracts and deliver the required services.

- **Consortium Programmes** - our consortiums bring together small groups of talent from industry-leading organisations to stimulate fresh perspectives and insights.

If you are accessing an Executive Education Consortium Programme, this will be provided by Centre for Management Development Company Limited at London Business School. Information that you share with Centre for Management Development Company Limited may be shared with London Business School in order to fulfil our contracts and deliver the required services.

If you have any questions about our work within Executive Education or this privacy notice, please contact us at:

Legal Team  
Executive Education London  
Business School Regent's  
Park  
London NW1 4SA  
[Execedlegalteam@london.edu](mailto:Execedlegalteam@london.edu)

## 5. What personal data do we collect about you?

Personal Data means any information which can directly or indirectly identify a person. During the course of the services that we deliver to you, we may collect the following information about you:

- (a) Name, preferred name, nationality, gender preference and date of birth
- (b) contact details including postal address, email and phone
- (c) your passport and travel details – **(in cases where we may assist you with your Visa applications)**
- (d) your communication preference
- (e) prior education, including university attended, subject studied and year of graduation
- (f) test scores, including GMAT, GRE and Executive Assessment scores (if you're interested in our degree programmes)
- (g) employment information, including name of business, industry, job title, level of seniority and number of years of postgraduate work experience
- (h) information about your family or personal circumstances, and both academic and extracurricular interests, for example where this is relevant to the assessment of your suitability to receive a scholarship or in order to provide you with appropriate pastoral care;
- (i) sensitive personal data and information, which may include the following:
  - (i) digital images and video's e.g. personal photo (option) and video's
  - (ii) health and medical conditions e.g. your dietary requirements, including allergies
  - (iii) information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation.

In these circumstances, we'll explain further why we're collecting your information and how we'll use it. Be aware that sensitive personal information may also be known as 'special categories of personal information' in some policies you read about data protection.

Further details on the information that we collect about our [Alumni can be found here](#).

## 6. How we collect information about you

We may collect your personal data from you in a number of ways, for example:

- (a) From your employer – who nominates and sponsors you to attend a customised or Open Enrolment Programme
- (b) From the information you provide to us when you interact with us before joining one of our Open Enrolment Programmes or a customised programme e.g. when you express an interest in attending one of our Programmes and discussing your suitability to attend specific Programmes.
- (c) When you apply to attend one of our open programmes and complete an enrolment form via our website, which also includes the acceptance of our Open Enrolment Programme Terms and Conditions, and when you complete other admissions processes and procedures
- (d) From the bio's we request you provide to tell us more information about you
- (e) When you set up a Canvas account. Canvas is LBS' Learning Management System.
- (f) When you complete any pre-programme assessments e.g. MTS, Hogan, Neo
- (g) During any inter-modular or post programme one-to-one or group coaching sessions
- (h) Through any exams undertaken
- (i) In various other ways as you interact with us during your Programme Learning Journey
- (j) As a member of our Alumni

## 7. What is the legal basis (purpose) for processing my Personal Data under data protection law?

Our legal basis for collecting and using your personal information described above will depend on the programme you attend, personal information concerned and the specific context in which we collect it. That said, we will normally collect personal information from you only if:

- (a) You have given consent to the processing of your personal data for one or more specific purposes. Consent conditions are very specific under GDPR and positive opt in consent is required for it to be legitimate. You or your employer (with your consent) will have given the initial consent for us to process your Personal Data.
- (b) Processing is necessary for the performance of a custom contract between us and your employer to which you are a recipient of the services under that contract.  
If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we'll make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your information).

This ground would apply to the bulk of processing necessary for carrying out our relationship with our clients, participants, staff, applicants for degrees and job applicants. It is not necessary for a full, legal contract to be in place for this ground to be met.

For Open Programmes, each Participant is required to enter into our Open Executive Education Terms and Conditions.

- (c) Processing is necessary for compliance with our legal obligation as a data controller. This ground applies to LBS' reporting obligations such as diversity reporting (which is anonymised) or sanctions checking.
- (d) Processing is necessary for the pursuit of the legitimate interests of LBS and CMD or an external organisation.  
As with processing of Personal Information in order to fulfil our contractual obligations, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we'll make clear to you at the relevant time what those legitimate interests are.

Legitimate interest can be used as the basis for processing personal data where London Business School is not performing a task in the public interest, for example cross-selling of our Open Programmes. Using this ground is dependent on a legitimate interest assessment – balancing the rights and freedoms of the individual against the legitimate interest that the University is processing the data in pursuit of.

We may also use your personal information in the following situations, which are likely to be rare:

- (e) Processing is necessary in order to protect you or another natural person's vital interests. This basis applies where the processing of your or another living person's personal data is necessary to protect your life or the vital interests of another individual, for example severe food allergies or dietary requirements.

If we require your consent for any additional uses of your personal information, including your image and more sensitive personal information we will collect it at the appropriate time and explain this to you. You can withdraw your consent at any time.

We will not use your personal information to carry out any wholly automated decision-making that affects you.

## 8. Can you provide examples of processing?

We may process your personal data for a range of contractual, statutory or public interest purposes, including the following:

- (a) To deliver and administer your education, record the details of your studies (including any placements with external organisations), determine/confirm your academic achievements (e.g. results, prizes), and provide you with any relevant certificates
- (b) To administer student related policies and procedures including appeals, complaints, grievances, disciplinary matters (including plagiarism and academic misconduct and Fitness to Practise and Health and Conduct Committee), and matters related to health and welfare
- (c) To operate security (including CCTV), governance, audit and quality assurance processes and arrangements at London Business School premises
- (d) To administer the financial aspects of your relationship with us and any funders, including international funders and manage the granting of scholarships, bursaries and other discretionary payments
- (e) To deliver facilities or services to you (e.g. IT including the provision of our Learning Management System - Canvas, sport, including access our on-site gym, libraries, accommodation, careers, catering, counselling and disability services)
- (f) To produce identification cards which may contain your name and/or images and maintain records of your name and/image so that we can identify you and enable you access to our premises where you have forgotten or misplaced your identify card
- (g) To support your learning and professional journey, medical, safety, welfare and religious requirement
- (h) To compile statistics or conduct research for internal and statutory reporting purposes
- (i) To fulfil and monitor our responsibilities under UK equalities, immigration and public safety legislation
- (j) To monitor your attendance on our programmes in accordance with our policies and/or programme requirements
- (k) To prepare and support you with your Visa applications
- (l) To enable us to contact others in the event of an emergency (we will assume that you have checked with the individuals before you supply their contact details to us)
- (m) To film and record certain lectures. Please note that before filming your consent will be sought and you will have the opportunity to opt-out of the filming or recording
- (n) Where relevant to monitor, evaluate and support your project or group work and experiential activities
- (o) To enable your participation at specific events, including graduation ceremonies.
- (p) To communicate effectively with you by post, email, and phone including the distribution of relevant newsletters and circulars containing information we consider necessary to support your experience at London Business School. Where appropriate you will be given the opportunity to opt-out of receiving some communications from us
- (q) We may also contact you by social media channels and applications where you have joined social networks set up specifically for your programme or initiated contact with in this way

## 9. Who will my personal data be shared with?

Your Personal Data will be shared with relevant staff at London Business School, Centre for Management Development Company Limited and any third party contributor in order to deliver our contractual obligations to you or your employer, as users of our services e.g. Coaches, Guest Speakers etc. In addition, it is shared as permitted or required by law, on a considered and confidential basis, with one or more of the following companies or third parties:

- (a) Your employer (as appropriate (and for certain information if consent is given) or funders and/or sponsors
- (b) External examiners and assessors (if applicable)
- (c) Relevant UK Government Departments (e.g. where you have requested our support with immigration or UK Visas).

## 10. What are my rights in connection with my Personal Data?

You have following rights:

- Right of access.

You can request a copy of the information we hold about you via a Subject Access Request.

You have the right to request a copy of the personal information LBS holds about you, except where releasing that information would breach another person's privacy or where an exemption applies, and to have any inaccuracies corrected.

If we do hold information about you, we'll:

- give you a description of it
- tell you why we are holding it
- tell you who it could be disclosed to, and
- let you have a copy of the information in an intelligible form.

You may request in writing that LBS disclose details of data which it holds about you and the purpose for which such data is held. A 'Subject Access Request Form' will be supplied upon request. We'll need your passport or driver's licence for proof of identity. We'll use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files.

If we hold information about you, you can ask us to correct any mistakes by contacting the Data Protection Officer.

Please address requests and questions about this or any other issue related to this policy to the Data Protection Officer, London Business School, Regent's Park, London, NW1 4SA, United Kingdom, or email: [dpo@london.edu](mailto:dpo@london.edu)

- Right of rectification

Update or amend the information we hold about you if it is incorrect.

You can do this by updating your profile online or by contacting the Data Protection Officer at [dpo@london.edu](mailto:dpo@london.edu)

- Right of erasure

Ask us to remove your personal information from our records.

If you request that your data be erased, we'll securely dispose of it unless we have a legal or financial obligation to keep it). We'll continue to retain a core set of personal data (name, email address, unique LBS identification reference) to ensure we don't contact you again in the future.

Please address requests to delete your data to the Data Protection Officer, London Business School, Regent's Park, London, NW1 4SA, United Kingdom, or email: [dpo@london.edu](mailto:dpo@london.edu)

- Right to restrict processing

You have the right to 'block' or suppress processing of your personal data. When processing is restricted, we're permitted to store the personal data but not further process it. We can retain just enough information about you to ensure that the restriction is respected in future.

If you request that your data processing be blocked, we'll continue to retain a core set of personal data (name, email address, unique LBS identification reference) to ensure we don't contact you again in the future.

Please address requests to delete your data to the Data Protection Officer, London Business School, Regent's Park, London, NW1 4SA, United Kingdom, or email: [dpo@london.edu](mailto:dpo@london.edu)

- Right to data portability

You have the right to obtain a copy of your personal data so that it can be reused for your own purposes in another IT environment.

If you want to request a copy of your personal data then please address requests to the Data Protection Officer, London Business School, Regent's Park, London, NW1 4SA, United Kingdom, or email: [dpo@london.edu](mailto:dpo@london.edu)

- Right to object to processing

You have a right to object by withdrawing your consent at any time.

- Right to make a complaint to the supervisory authority

If you are not happy with the way your information is being handled by us, or with the response received from us you have the right to make a complaint to the Information Commissioner's Office (ICO):

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire, SK9 5AF  
United Kingdom  
Tel: +44 (0)303 123 1113 (local rate)  
Web: [ico.org.uk](http://ico.org.uk)

## 11. How long will my information be kept for?

Your Personal data will be kept on our systems according to the terms and conditions of our contracts and the retentions schedule below.

Retentions Schedule		
	Data	Retention Period
<b>Leads</b>	All 'lead' data – where a lead is defined as someone a Client Director is working with from the Client side to engage with the Client.	7 years
<b>Enquirers</b>	All data on an Enquirer (that they have provided through LBS website or through interaction with LBS)	3 years (in line with school wide retention period for Enquirers)
<b>Applicants</b>	Front cover sheet (hard copy) Invitation Letters Visa letters DHL Courier forms	Completion of programme (end of programme date)
	Excel record of cover sheets Excel record of application records Application forms Class lists	3 years post-completion of programme
	Excel record of cancellations Excel record of checkpoint checks (payment chasing)	Indefinitely – so that we can have an awareness of those who frequently cancel programmes or who do not pay
	Acceptance letters Participant data which are programme specific (core data is treated as Past Participants)	2 years
<b>Event Attendees</b>	Event attendee data	3 years
<b>Past Participants</b>	Participant data (e.g. Name, address, contact details, programme attendance)	Indefinitely
<b>Finance</b>	Participant data Invoices	6 years (statutory for audit purposes)
	Staff data	6 years (statutory for audit purposes)
<b>Legal</b>	Contracts	7 years (statutory for Audit/Legal purposes)
<b>Analytics</b>	Participant/Client Contact data	3 years (to allow for this time last year comparison)

## 12. Will I be contacted for marketing purposes?

If you attend one of our Open Programmes, we offer regular emails to let you know about our products and services and to inform you of the latest LBS research and insights. We may also invite you to take part in surveys about our products and services or issues affecting LBS.

LBS may personalise the message content based on any information you provide to us and your use of our platforms.

You can update your communications preferences and stop receiving any future emails at any time by following the convenient links located at the bottom of our emails. Requests submitted in this manner are processed and effective immediately.

If you believe you have received unwanted, unsolicited emails sent by or purporting to be from LBS, please forward a copy of that email with your comments to our Data Protection Officer, [dpo@london.edu](mailto:dpo@london.edu) for review. Occasionally, we may contract a third party to communicate on our behalf to the third-party's contacts. We don't collect your email address or contact information from this third party, and we don't have access to their mailing list.

Depending on the nature of the third-party mailing, we may, in order to comply with applicable laws, provide the third party with a suppression list of contacts to exclude from their list. The third party doesn't have permission to

keep or market to contacts this list, or to use it in any way other than as a suppression list for a mailing they're providing on our behalf.

### **13. Changes to Executive Education's Privacy Statement**

This Privacy Statement may be updated so you may wish to check it each time you submit personal information to LBS and/or CMD. The date of the most recent revisions will appear on this page. If you don't agree to these changes, please refrain from using LBS websites to submit personal information to us.

If material changes are made to the Privacy Statement, for instance affecting how we'd like to use your personal information, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

### **14. Contacting LBS about this Website Privacy Policy**

If you have any questions or comments about this Privacy Policy, please contact:

Legal Team  
Education London Business  
School  
Regent's Park, London, NW1 4SA, United  
Kingdom  
Email: [Execedlegalteam@london.edu](mailto:Execedlegalteam@london.edu)