



# Onyx Student Support Ltd Privacy Policy

Effective Date: 13/11/2025 Review Date: 13/11/2026

## 1. Introduction

Onyx Student Support Ltd (“Onyx”, “we”, “us”, or “our”) is committed to protecting your privacy, ensuring that all personal data is handled lawfully, securely, and transparently in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This Privacy Policy explains how we collect, use, store, and protect personal information about:

- Students who receive support from Onyx;
- Freelancers who provide support services on behalf of Onyx;
- Employees of Onyx; and
- Higher Education Institutions (HEIs), funding bodies, and other partners.

It also describes how we use cookies and similar technologies on our website.

## 2. Who We Are

### Onyx Student Support Ltd

Registered Company No: 14244398

Registered Address: 12 Payton Street, Stratford-upon-Avon, Warwickshire, CV37 6UA

### Data Protection Officer (DPO):

Jane Pickering

Email: datagovernance@onyxstudents.com Telephone: 01604 713103

Onyx acts as a Data Controller for personal data processed in relation to students, freelancers, employees, and partners.

## 3. What Data We Collect

Onyx collects only the personal data necessary to provide our services, manage operations, and meet our legal obligations.

Data Category	Examples	Applies To
Identification Data	Name, address, email, date of birth	Students, freelancers, employees
Employment & Professional Data	Qualifications, right-to-work checks, DBS verification, training records	Freelancers, employees



<b>Data Category</b>	<b>Examples</b>	<b>Applies To</b>
<b>Financial Data</b>	Bank details, invoices, remittance information, payment history	Freelancers, employees, partners
<b>Educational Data</b>	DSA2 forms, course details, session notes, workplans	Students
<b>Health or Disability Data</b>	Relevant disability or needs assessment information	Students, employees
<b>Safeguarding &amp; Compliance</b>	Incident reports, risk assessments	All (as required)
<b>Communications</b>	Emails, meeting notes, service coordination records	All
<b>IT &amp; System Access</b>	Logins, device use, system security logs	Employees

#### 4. How We Use Personal Data

We use personal data to:

- Deliver, coordinate, and manage support sessions for students.
- Administer freelancer and employee contracts, payments, and training.
- Communicate with HEIs and assessment centres.
- Comply with safeguarding, audit, and legal requirements.
- Improve quality and performance through audit and review.
- Maintain secure systems and comply with data-protection law.

We do not sell, rent, or share personal data for marketing or advertising purposes.

#### 5. Lawful Basis for Processing

Onyx processes personal data under the following lawful bases:

<b>Purpose</b>	<b>Lawful Basis (UK GDPR)</b>
Delivering student support and services	<b>Article 6(1)(b) – Contract</b>
Employment, HR, and freelancer engagement	<b>Article 6(1)(b) – Contract</b>
Financial, audit, and regulatory compliance	<b>Article 6(1)(c) – Legal Obligation</b>
Safeguarding and wellbeing	<b>Article 6(1)(d) – Vital Interests</b>



Purpose	Lawful Basis (UK GDPR)
Quality assurance and operational improvement	<b>Article 6(1)(f) – Legitimate Interests</b>
Processing health/disability data	<b>Article 9(2)(b) – Employment, social protection, education</b>

## 6. Sharing Data

Onyx shares personal data only with authorised organisations or individuals when necessary, lawful, and proportionate.

This may include:

- **Funding bodies** (e.g., Student Finance England/Wales);
- **Universities, colleges, and assessment centres;**
- **Auditors and regulators;**
- **Payroll and accounting systems;**
- **IT and cloud service providers** under signed data-processing agreements;
- **Safeguarding agencies** when required by law or duty of care.

All third parties are required to process data securely and only for the purposes defined by Onyx.

## 7. Data Retention

We retain personal data only for as long as necessary, as set out in our *Data Retention and Deletion Schedule (2025)*:

Data Type	Retention Period	Reason / Legal Basis
<b>Student data</b> (DSA2, workplans, session notes)	2 years after support ends	DSA and audit compliance
<b>Timesheets / payment records</b>	6 years	HMRC and funding audit
<b>Freelancer compliance records</b>	2 years after leaving	Audit and re-engagement verification
<b>Employee HR records</b>	6 years after leaving	Employment law
<b>DBS verification</b>	6 months	DBS Code of Practice
<b>Partner/HEI correspondence</b>	6 years after contract ends	Contractual limitation
<b>Safeguarding and incident reports</b>	As required by law	Public interest protection



After these periods, data is securely deleted or anonymised.

## 8. Data Security

Onyx employs layered technical and organisational security measures:

- Password-protected and encrypted systems;
- Multi-factor authentication for employees;
- Encrypted email communications;
- Role-based access controls;
- Locked storage for physical files;
- Secure deletion procedures following *Data Deletion Processes (2025)*.

Freelancers are required to comply with the *Freelancer Data Protection & Confidentiality Addendum (DPOF-001)*.

## 9. Cookies and Website Tracking

When you visit the Onyx website, small files called cookies may be placed on your device to help the site function properly and improve your experience.

### What We Use Cookies For

- To enable essential website functions (e.g., login, navigation).
- To remember preferences such as accessibility and language settings.
- To collect anonymous analytics about website traffic and usage patterns.
- To improve accessibility, speed, and overall site performance.

We do **not** use cookies for advertising or profiling purposes.

### Managing Cookies

When visiting our website, you'll see a cookie banner allowing you to:

- **Accept all cookies;**
- **Reject non-essential cookies;** or
- **Manage your settings** at any time.

You can also disable cookies through your browser settings.  
For full details, please see our Cookies Policy..

## 10. Your Rights

Under the **UK GDPR**, you have the right to:

- Access the data we hold about you;



- Request correction or deletion;
- Restrict or object to processing;
- Withdraw consent (where applicable);
- Complain to the **Information Commissioner's Office (ICO)**.

### **Information Commissioner's Office**

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

[www.ico.org.uk](http://www.ico.org.uk)

## **11. Data Transfers**

Onyx does not routinely transfer data outside the UK.

If data must be processed internationally (e.g., by secure cloud providers), Onyx ensures that appropriate UK adequacy regulations or Standard Contractual Clauses (SCCs) are in place.

## **12. Data Breach and Reporting**

Any suspected or confirmed data breach must be reported immediately to the Data Protection Officer (DPO).

Onyx will:

- Investigate within 24 hours;
- Record and assess the risk;
- Notify the ICO within 72 hours if required; and
- Inform affected individuals where appropriate.

## **13. Accountability and Governance**

Onyx demonstrates accountability through:

- Data Protection training for employees and freelancers;
- Annual policy reviews and audits;
- Data Impact Assessments (DPIAs) where required;
- Maintaining Records of Processing Activities (ROPAs).

All compliance is overseen by the DPO and the Data Governance Committee.

## **14. Related Policies and Notices**

This policy should be read alongside the following Onyx documents:



## **Document**

Data Protection Policy

Confidential Information Policy

Cookies Policy

Student Privacy Notice

Freelancer Privacy Notice

Employee Privacy Notice

HEI & Partner Privacy Notice

Data Retention & Deletion Processes

## **15. Review**

This Privacy Policy will be reviewed annually or earlier if required by changes in law, funding arrangements, or operational processes.

**Approved by:** Jane Pickering

**Role:** Data Protection Officer