

ASK33 Privacy Policy

UK GDPR and Data Protection Act 2018 Privacy Notice

Organisation	ASK3.3 Limited
Role	Data controller for the personal data described in this policy, unless we clearly state otherwise.
Contact email	info@ask33.co.uk
Postal address	217B Gloucester Terrace, W2 6HX
Company number	12897944

1. Who we are

ASK3.3 provides education advice, student recruitment, application support and related student services. In this privacy policy, “ASK3.3”, “we”, “us” and “our” means ASK3.3 Limited .

For most of the activities described in this policy, we decide why and how your personal data is used. This means we are the “data controller” under UK data protection law.

In some situations, we may process information on behalf of a university, college, education provider or platform. Where this happens, that organisation may also be a controller or may give us instructions as a processor. We will make this clear where relevant.

2. What this policy covers

This policy explains how we collect, use, share and protect personal data when you contact us, use our services, apply for a course through us, work with us as an agent or staff member, visit our website or social media pages, attend events, or communicate with us by phone, email, WhatsApp, forms or other channels.

Personal data means information that can identify you directly or indirectly, such as your name, phone number, email address, documents, application details or messages with us.

3. The personal data we collect

Category	Examples
Identity and contact data	Name, date of birth, address, email address, phone number, nationality, country of residence, student ID or applicant reference number.
Application and education data	Course interests, previous studies, qualifications, certificates, transcripts, English language evidence, application forms, interview notes and admissions updates.
Financial and funding data	Student finance information, evidence of eligibility, payment records, invoices, commission-related records and information needed to deal with funding or fee queries.
Right to study / status data	Documents or information relating to immigration status, residency, settled/pre-settled status, passport or ID checks where needed for an application or partner requirement.
Communications data	Emails, WhatsApp messages, call notes, social media messages, complaints, feedback, support requests and meeting notes.
Marketing and social media data	Marketing preferences, campaign source, advert interactions, Facebook/Instagram/TikTok profile information if you contact us through those platforms.
Technical and website data	IP address, device information, browser type, cookie data, website usage and analytics data where our website uses these tools.
Agent, staff and business contact data	Name, contact details, role, performance records, commission records, contracts, tax/payment details, training records and

	communications.
Special category data	Health, disability, ethnicity or other sensitive information only where relevant to your application, support needs, equality monitoring, legal obligations or where you choose to provide it.

4. How we collect your personal data

We may collect personal data directly from you when you fill in a form, send documents, contact us, attend a consultation, use our website or social media pages, or ask us to support your application.

We may also receive personal data from universities, colleges, education providers, student finance bodies, application platforms, recruitment agents, team leaders, marketing platforms, event partners, professional advisers, payment providers and public sources where this is lawful and relevant.

5. Why we use your personal data and our lawful bases

UK data protection law requires us to explain both the purpose and the lawful basis for each type of processing. The table below sets this out in plain language.

Purpose	Examples of use	Lawful basis	Where legitimate interests apply
Provide education advice and application support	Assess your course interests, explain options, help prepare and submit applications, support enrolment.	Contract or steps before entering a contract; legitimate interests.	To provide a useful advisory service and manage student applications efficiently.
Communicate with you	Respond to calls, emails, WhatsApp, social media messages and support queries.	Contract; legitimate interests; consent for some optional channels.	To keep proper records and answer your requests.
Share application details with education providers	Send application forms, documents, interview notes and updates to universities, colleges or admissions platforms.	Contract; legitimate interests; legal obligation where required.	To progress your application and manage our partner relationships.
Check eligibility and support student finance queries	Review information about residency, funding, SFE status or course eligibility where relevant.	Contract; legal obligation; legitimate interests.	To reduce errors, prevent unsuitable applications and support proper funding processes.
Marketing and follow-up	Send course information, open day details, service updates, campaigns and reminders.	Consent for electronic direct marketing where required; legitimate interests for limited business/customer follow-up.	To promote relevant services. You can opt out at any time.
Manage agents, staff, contractors and commissions	Recruit, train and manage staff/agents, calculate commission, handle payroll, tax and performance records.	Contract; legal obligation; legitimate interests.	To run the business properly and keep accurate payment and performance records.
Fraud prevention, quality control and compliance	Check documents, monitor complaints, audit activity, investigate suspicious behaviour and maintain evidence.	Legal obligation; legitimate interests.	To protect students, partners and ASK33 from fraud, mistakes and misuse.
Improve services and website	Review enquiries, campaign performance, website analytics and service feedback.	Legitimate interests; consent where cookies require it.	To understand what works and improve services without using more data than needed.
Deal with complaints, disputes and legal claims	Keep evidence, respond to complaints, recover debts, defend claims and cooperate with regulators.	Legal obligation; legitimate interests.	To protect legal rights and resolve issues fairly.
Use special category data where necessary	Support disability needs, equality monitoring or application requirements where relevant.	Explicit consent; substantial public interest where applicable; legal claims where needed.	Not usually based on legitimate interests alone.

6. Legitimate interests explained

When we rely on legitimate interests, we have considered whether our use of your data is necessary, fair and balanced against your rights. We only use this basis where we believe the impact on you is low, expected in the context of our relationship, and not overridden by your privacy rights.

Our legitimate interests include running and improving our education advisory services, communicating with applicants and partners, preventing fraud, keeping accurate business records, managing agents and staff, protecting legal rights, and measuring the performance of campaigns and services.

You have the right to object to processing based on legitimate interests. See section 14 for how to contact us.

7. Consent and how to withdraw it

Where we rely on consent, you can withdraw that consent at any time by contacting us using the details in this policy or by using any unsubscribe option provided in our marketing messages.

Withdrawing consent does not make our previous use of your data unlawful. It may mean we cannot provide certain optional services or communications.

8. Special category data

Special category data is more sensitive personal data, such as information about health, disability, ethnicity, religion, sexual orientation or biometric data. We do not ask for this unless it is relevant and lawful.

For example, a student may choose to tell us about a disability so we can help explain support options or pass relevant information to an education provider. We will only share this where necessary and with an appropriate lawful basis.

9. Who we share personal data with

We only share personal data where necessary, lawful and proportionate. We may share your data with the following categories of recipients:

- Universities, colleges, awarding bodies and education providers for application, enrolment and support purposes.
- Admissions platforms, student recruitment platforms and student finance-related bodies where relevant to your application or funding query.
- Recruitment agents, team leaders, staff members and contractors who help provide ASK33 services.
- IT providers, cloud storage providers, CRM systems, email providers, phone/communication providers and document management systems.
- Marketing, analytics and social media platforms, including platforms such as Meta/Facebook, Instagram, TikTok, Google or similar, where we use those tools.
- Payment providers, banks, accountants, auditors, tax advisers and payroll providers.
- Legal advisers, insurers, debt recovery providers, regulators, courts, public authorities or law enforcement where required or necessary.
- Business partners or successors if ASK33 restructures, sells or transfers part of its business, subject to appropriate safeguards.

Where a service provider processes data for us, we require them to use the data only for agreed purposes and to protect it appropriately.

10. International transfers

Some of our systems, platforms, partners or service providers may store or access personal data outside the United Kingdom. This may happen, for example, when we use cloud, email, CRM, analytics or social media platforms that operate internationally.

Where personal data is transferred outside the UK, we will use a lawful transfer mechanism where required. This may include UK adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to EU Standard Contractual Clauses, or another lawful safeguard under UK data protection law.

You can contact us if you would like more information about the safeguards used for a particular transfer.

11. How long we keep personal data

We do not keep personal data forever. We keep it only for as long as necessary for the purpose it was collected, including to meet legal, tax, accounting, audit, partner, complaint and dispute requirements.

The table below gives our usual retention periods. These may be extended where we need to deal with a complaint, legal claim, audit, investigation or unpaid balance.

Data type	Usual retention period / criteria
Student enquiry data	Up to 2 years after the last meaningful contact if no application is made.
Application and enrolment records	Up to 6 years after the end of the relevant intake, application cycle, contract, payment period or final interaction.
Financial, invoice, commission and tax records	Usually 6 years from the end of the relevant financial year, or longer if required by law or dispute.
Marketing preferences	Until you opt out, withdraw consent, or we refresh/remove inactive marketing records.
Website analytics and cookie data	According to the cookie/tool settings, usually between session-only and 24 months. See our cookie notice if applicable.
Complaint, dispute and legal records	Up to 6 years after closure, or longer where legal proceedings, regulatory checks or serious complaints require it.
Agent, staff and contractor records	Usually 6 years after the working relationship ends, unless a longer period is required for tax, legal or safeguarding reasons.
Special category data	Only for as long as needed for the specific purpose, then deleted or anonymised where possible.

12. Children and young people

Our services are mainly intended for adults and adult learners. We do not knowingly collect personal data from children under 16 without appropriate involvement from a parent, guardian, school, college or other authorised adult where required.

If we become aware that we have collected data from a child without a lawful reason or appropriate safeguards, we will delete it or take steps to obtain the necessary consent or authorisation.

Where we support younger applicants, we will use age-appropriate information, collect only what is necessary, and involve a parent or guardian where required.

13. Automated decision-making and profiling

We do not make decisions about you that have a legal or similarly significant effect using solely automated decision-making.

We may use basic filtering, CRM tags, reminders, campaign tracking or analytics to help manage enquiries and communications. These tools do not make final decisions about your application, eligibility or access to services without human involvement.

If this changes, we will update this policy and explain the logic involved, the significance of the processing and your rights.

14. Your data protection rights

Depending on the situation and lawful basis, you may have the right to:

- Ask for a copy of your personal data.
- Ask us to correct inaccurate or incomplete data.
- Ask us to delete your data in certain situations.
- Ask us to restrict how we use your data in certain situations.
- Object to processing based on legitimate interests or direct marketing.
- Ask for data portability where this applies.
- Withdraw consent where we rely on consent.
- Complain to the Information Commissioner's Office (ICO).

The right to object is important. You can object to direct marketing at any time. You can also object where we rely on legitimate interests, and we will consider your request carefully.

We usually respond to rights requests within one month. If your request is complex or you make several requests, we may need extra time as allowed by law. We may need to verify your identity before responding.

15. How to exercise your rights

To exercise your rights, contact us at: info@ask33.co.uk. Please include your name, contact details, the right you want to exercise and enough information for us to identify the relevant records.

You do not have to use a special form. If we need more information to process your request, we will tell you.

16. Complaints

We would like the chance to resolve any concern first. Please contact us using the details above if you are unhappy with how we use your personal data.

You can also complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection. ICO website: <https://ico.org.uk>. ICO helpline: 0303 123 1113. ICO postal address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

17. Security

We use appropriate technical and organisational measures to protect personal data. These may include access controls, password protection, secure storage, staff training, limited access to records, audit checks and secure deletion where appropriate.

No system is completely risk-free, but we aim to use data carefully and only give access to people who need it for their role.

18. Cookies and similar technologies

If our website uses cookies, pixels, analytics tools or similar technologies, we will explain this in a cookie notice or cookie banner where required.

Cookies may help the website work, measure visits, improve content, or support marketing. Non-essential cookies will only be used where the law allows, including with consent where required.

19. Links to other websites and platforms

Our website, social media pages, messages or forms may contain links to third-party websites or platforms. Those organisations have their own privacy policies. We are not responsible for how they use your data once you leave our systems or choose to interact with them directly.

20. Changes to this policy

We may update this policy from time to time, especially if our services, systems, partners or legal obligations change. The latest version will be available on our website or provided on request.

Where a change is important, we may notify you by email, website notice or another appropriate method.

