

DATA SHARING PRINCIPLES

This document sets out the framework for the sharing of personal data between Prodigy Finance and the School (each a “**Party**” and collectively, the “**Parties**”), as joint controllers, pursuant to arrangements that the Parties have in place relating to the provision of student finance (“**Services**”). This document also defines the principles that Prodigy Finance and the School shall adhere to and the responsibilities the Parties owe to each other and data subjects.

1. Definitions

The terms “ process/processing ”, “ data subject ”, “ controller ”, “ joint controller ” “ personal data ”, “ special categories of personal data ”, “ personal data breach ” and “ supervisory authority ” shall have the same meaning ascribed to them in Data Protection Laws	
Agreed Purposes	means the exercise and the performance by each Party of its rights and obligations in relation to the Services;
Complaint	means a complaint relating to the processing of the Shared Personal Data, including any compensation claim from a data subject or any notice or other action from a supervisory authority relating to the foregoing;
Data Protection Laws	means all legislation and regulatory requirements in force from time to time relating to the use of personal data and the privacy of electronic communications, to the extent that the same are applicable to the Parties, including the UK Data Protection Act 2018 and the General Data Protection Regulation (EU 2016/679) (“ GDPR ”);
Data Subject Request	means any request from a data subject seeking to exercise their rights under Data Protection Laws in relation to the Shared Personal Data;
Permitted Recipients	means the Parties, the employees, consultants and affiliates of each Party, including professional advisors and any third parties engaged to perform obligations in connection with the Services, and any successor to one of the Parties;
Shared Personal Data	means personal data to be shared between the Parties in connection with the Services.

2. General Principles

In relation to the Shared Personal Data, each Party shall:

- 2.1 comply with all obligations imposed on a controller under Data Protection Laws;
- 2.2 process the Shared Personal Data only for the Agreed Purposes and in all respects in accordance with Data Protection Laws;
- 2.3 not disclose or permit access to the Shared Personal Data to anyone other than the Permitted Recipients;
- 2.4 implement and maintain appropriate technical and organisational measures to protect the Shared Personal Data against accidental, unauthorised or unlawful destruction, loss, alteration, disclosure or access; and
- 2.5 undertake processing of the Shared Personal Data only to the extent consistent with the Agreed Purpose.

3. Information to be provided to data subjects

Each Party shall ensure that relevant data subjects have been provided with sufficient information, in a privacy notice, so as to enable fair, transparent and lawful processing (including sharing) of the Shared Personal Data, and which complies with the requirements of Articles 13 and 14 GDPR or other applicable Data Protection Laws.

4. Mutual Assistance, Data Subject Requests and Complaints

- 4.1 Each Party shall provide reasonable assistance to the other in complying with all applicable requirements of Data Protection Laws. In particular, each Party shall, in relation to the Shared Personal Data:

- 4.1.1 promptly inform the other Party about the receipt of any Data Subject Request or Complaint;
 - 4.1.2 consult with and assist the other Party, at the reasonable cost of the other Party, with responding to a Data Subject Request or Complaint and in ensuring compliance with its obligations under Data Protection Laws with respect to security, breach notifications, impact assessments and consultations with supervisory authorities or regulators;
 - 4.1.3 notify the other Party without undue delay (and in any event within 48 hours) on becoming aware of any breach of Data Protection Laws, and any personal data breach; and
 - 4.1.4 maintain complete and accurate records and information to demonstrate compliance with these principles.
- 4.2 As between the Parties, responsibility for compliance with and responding to:
- 4.2.1 any Data Subject Request falls on the Party which first received such Data Subject Request;
 - 4.2.2 any Complaint falls on the Party which receives the Complaint;
 - 4.2.3 each Party's respective obligations in respect of any personal data breach (including notification of the supervisory authority and/or Data Subject(s)) impacting or relating to any Shared Personal Data falls on the Party which suffers the personal data breach; and
 - 4.3.4 each Party's respective obligations in respect of any other obligation under Data Protection Laws falls on each Party subject to such obligation(s).

5. Miscellaneous

The Parties acknowledge that the essence of the arrangements in this document shall be made available to relevant data subjects.