

Privacy Notice for Students/Parents with US Federal Loans

How we use your data

This Privacy Notice outlines how the University of Kent collects, uses and manages the personal information of individuals in accordance with data protection law.

As a UK-based institution participating in the U.S. Federal Student Aid (Title IV) programmes, the University is required to process personal data for the purpose of administering U.S. federal loans. This involves handling personal information in ways that differ from standard student administration, including sharing data with organisations such as the U.S. Department of Education and its loan servicers, as well as third-party service providers (for example, payment providers such as Convera) and other relevant bodies for verification, compliance, and audit purposes. This dedicated privacy notice is therefore provided to explain how personal data is used in this specific context and should be read alongside the University's general Privacy Notices.

The University of Kent is registered as a 'Data Controller' under registration number Z6847902. [View the full entry on the register](#)

This Privacy Notice is supplementary to, and should be read in conjunction with, the [Privacy Notice for Applicants](#) and/or the [Privacy Notice for Students](#) (as applicable).

You can also see our FERPA policy here:

<https://www.kent.ac.uk/scholarships/funding-for-american-students/consumer-information>

How we collect your personal information

Your personal data in connection with processing your US Loan for studying at the University of Kent is obtained:

- directly from you, through online or paper forms, email or by telephone
- from U.S. Federal Student Aid systems and processes (including information submitted via the FAFSA and related systems).
- from the U.S. Department of Education and its loan servicers in connection with the administration of your loans.
- from other relevant organisations, such as previous educational institutions, where necessary to verify your eligibility or prior study.

Categories of information we collect

Personal data we may collect about you in connection with your US Loan includes:

- your full name
- contact details: address(es) and postcode (home and term time), email address(es), mobile or landline telephone numbers.
- date of birth
- social security number (SSN)
- online identifiers
- government-issued identification details
- residency and immigration status
- education related information
- family and household information, including marital status and information about parent or spouse (where required for aid determination)
- information relating to prior U.S Federal Student Aid, including loan history, defaults and overpayments.
- Parent information relating to prior U.S Federal Student Aid, including loan history, defaults and overpayments.
- supporting documentation to resolve eligibility issues (for example, proof of identify, immigration or citizenship documentation).
- nationality/citizenship status
- proof of residency or domicile where required
- financial information, including but not limited to income and tax information and details of assets FAFSA transaction data and comment codes
- student aid index
- parent name and contact details
- parent SSN
- if applicable, endorser name and contact details
- if applicable, endorser SSN

To comply with US department of Education regulations we may request additional information or documentation as necessary to resolve FAFSA comment codes or to support professional judgement determinations related to Title IV eligibility, this may include but not limited to information regarding medical conditions or incarceration, if it relates to your professional judgement request.

How we use your personal information

The Foreign Loans office have an obligation to ensure that all applicable student loan applications are processed in adherence to US Department of Education Regulations.

This includes:

- Assess and confirm your eligibility for US Federal Student Aid
- Package (determine and offer your eligible US Federal Student Aid), originate (create and submit your loan to the US Department of Education), and manage your US federal loan.

- Request additional information or documentation where required to verify your identity, status, eligibility, to resolve comment codes or professional judgement requests.
- Maintain records required under US Department of Education regulations and institutional compliance obligations.
- Carry out reporting, audit, compliance and regulatory monitoring activities connected with participation in the US Federal Student Aid programme and prevent, detect and investigate fraud.

As we have a contractual basis to process your personal data if we do not receive this personal data, we may not be able to assess your eligibility for or facilitate your U.S Federal loan.

Our lawful basis for processing your data

We rely on the following lawful basis as allowed by the UK GDPR for processing your personal data as this is necessary for:

- the performance of a task carried out in the public interest or in the exercise of official authority - [Article 6\(1\)\(e\)](#) – to facilitate the loan recipient to study at the University of Kent
- the performance of a contract to which the data subject is party - Article 6(1)(b) – to process the loan information in line with requirements specified by the US Department of Education.

As we may also process your special category data, we must identify a further basis for processing that data. The processing is necessary for:

- reasons of substantial public interest (as defined within the Data Protection Act 2018)– [Article 9\(2\)\(g\)](#).

Our substantial public interest reason(s) is/are:

- statutory purposes
- equality of opportunity or treatment

As we also use your [criminal offence data](#), we additionally rely on the extension of the public interest conditions in section 36, Part 3 of [Schedule 1 of the Data Protection Act 2018](#).

We have a Special Category and Criminal Offence Data Appropriate Policy document in place throughout the time that we use your data and for 6 months after we cease to use it. This Appropriate Policy Document can be viewed on our [policies and procedures webpage](#).

Who your information will be shared with

Your personal information may be shared with relevant, authorised third parties as part of the student financial aid process, including:

- US government bodies, such as the US Department of Education and its loan servicers (such as Convera); and
- Where necessary, with relevant third parties such as previous or current educational institutions, regulatory bodies and auditors for the purposes of verifying information, ensuring compliance with applicable requirements, and supporting audit or assurance processes.

These organisations use your personal data for their legitimate purposes to process your US Loan.

For more information, please see *the U.S. Department of Education website*:
<https://www.ed.gov/about/ed-overview/required-notices/privacy/privacy-policy-us-department-of-education>

To administer federal student aid, the University of Kent may need to contact a student's current, prior or concurrent educational institution. This may occur when we need to:

- Verify federal aid eligibility or history
- Resolve conflicting information related to federal student aid
- Confirm enrolment status, academic progress, or prior loan disbursements
- Ensure compliance with U.S. Department of Education (USDE) regulations

Any information shared with a prior institution will be **limited to what is necessary** for these purposes and shared in accordance with the aforementioned lawful basis under UK GDPR.

Sometimes it is necessary for your personal information to be shared:

- with competent authorities (such as the police, NCA) or action fraud for law enforcement purposes (for on substantial public interest reasons – Article 9(2)(g) – for preventing or detecting unlawful acts, safeguarding or fraud purposes.
- with our professional advisors where it is necessary for the establishment, exercise or defence of legal claims – Article 9(2)(f).

Occasionally the University may, if appropriate, legitimate and necessary, rely on relevant exemptions to UK GDPR provisions as are allowed under the [Data Protection Act 2018](#) (in relation to crime and taxation, management forecasts, negotiations, confidential references and exam scripts and exam marks).

Transfer of your information outside of the UK

When it is necessary for us to transfer your personal information across national boundaries to a third party data processor, such as one of our service providers, we

will ensure this safeguards your personal information by requiring such transfers are made in compliance with all relevant data protection laws.

Countries data is transferred to: USA.

The transfer is authorised by:

- adequacy regulations made by the Secretary of State (which indicate the recipient country has equivalent personal data protection) found here: [What countries or territories are covered by adequacy regulations? \(ICO website\)](#); Department for Science, Innovation and Technology UK adequacy
- safeguards prescribed by the UK GDPR or EU GDPR (if applicable) such as EU Standard Contractual Clauses and the ICO Addendum or the ICO's International Data Transfer Agreement (IDTA). Further information here: [Is the restricted transfer covered by appropriate safeguards? \(ICO website\)](#)

How long your personal data will be kept

Your information will be kept for 6 years following the last academic year that you received the loan.

Security

We will ensure that security measures are in place to prevent the accidental loss, unauthorised use or access to your data. Access is given to staff on a 'need to know' basis. Our staff are required to keep your data safe and complete data protection training.

We have procedures in place to deal with any data security incidents and will notify you and the ICO in the event of a data breach where we are required to do so.

Your rights

Please be aware of the following rights which can be accessed free of charge by contacting dataprotection@kent.ac.uk:

- know how we are using your personal information and why (right to information)
- access the personal data held by us (subject access request)
- ask for correction of any mistakes (rectification)
- to object to direct marketing
- to complain to the ICO

In some circumstances you also have the right to:

- object to how we are using your information
- ask us to delete information about you (the right to be forgotten)
- have your information transferred electronically

- object to automated decisions which significantly affect you
- restrict us from using your information.

For further guidance regarding your rights please see the [ICO website](#).

Your right to complain

You have the right to lodge a complaint about how the University has processed your personal data. The University’s Data Protection Officer can be contacted by email to: dataprotection@kent.ac.uk

If you remain dissatisfied with the University’s handling of your complaint, you have the right to complain to the UK’s data protection supervisory authority, [Information Commissioner's Office](#). Their helpline telephone number is: 0303 123 1113.

Should you have a complaint regarding the processing of your US Loan, you have the right to file a complaint with the US Department of Education. We would however like to resolve your problem before this. You can contact the University’s Finance Department at: foreignloans@kent.ac.uk.

Contacts

If you have any questions or concerns about the way the University has used your data, or wish to exercise any of your rights, please consult our [website](#).

The University’s Data Protection Officer can be contacted at: dataprotection@kent.ac.uk

The University’s Finance Department can be contacted at: foreignloans@kent.ac.uk.

Document review date

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