

ANDERSON & ORCHARD LTD

Privacy Notice

How Anderson & Orchard Ltd collects, uses and protects personal information — for prospective students, applicants and website visitors.

Anderson & Orchard Ltd · Registered in England and Wales · Company No. 17140585 · Registered office: 16 Dancer Road, Richmond, England, TW9 4LA

Version 1.0 · Effective 7 October 2026

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Version 1.0 — effective 7 October 2026.

This document is published on our website and is reviewed at least once a year, and whenever the law or what we do changes.

Our details

Who we are. Anderson & Orchard Ltd is a private limited company registered in England and Wales under company number 17140585, whose registered office is 16 Dancer Road, Richmond, England, TW9 4LA. We trade as Anderson & Orchard.

What this organisation is. We provide guidance on higher education routes, application support and student finance application support to adults, particularly those without traditional qualifications and those returning to study. We are not a university, college or awarding body, and we do not decide admissions or student finance.

Our data protection contact. Our Managing Director is responsible for data protection and can be reached using the contact details published on our website, or by post at our registered office above.

Version. Version 1.0, effective 7 October 2026. We review this document at least once a year and whenever what we do changes.

Who we are and how to contact us

Anderson & Orchard Ltd is a company registered in England and Wales, company number 17140585, whose registered office is 16 Dancer Road, Richmond, England, TW9 4LA ("we", "us", "our").

We provide guidance, course-selection support, application support and student finance application support to people considering higher education as mature or non-traditional students.

We are the **data controller** for the personal information we collect through our website and in providing those services. That means we decide why and how that information is used, and we are accountable for it.

We are subject to the UK GDPR and the Data Protection Act 2018. We have appointed our Managing Director as the person responsible for data protection. You can contact them using the details published on our website, or by post at our registered office: 16 Dancer Road, Richmond, England, TW9 4LA.

We are not a university. We do not award qualifications and we do not decide whether you are admitted to a course or whether you receive student finance. Where a course is delivered by a university or college, that organisation is a separate data controller in its own right and its own privacy notice applies to what it does with your information.

What this notice covers

This notice explains what personal information we collect, where it comes from, why we use it, who we share it with, how long we keep it, and what rights you have. It applies when you:

- visit our website or contact us by form, email, telephone or messaging app;
- ask us for guidance, or discuss a course or route with us;
- ask us to help you prepare or submit an application, or to help with a student finance application;
- engage with us as a student we are supporting, or as a supplier, partner or professional contact.

Where a university or college instructs us to carry out a task for them and we handle information only on their instruction, we act as a **processor** and that organisation's privacy notice governs. Our website may link to third-party sites; this notice does not cover what they do.

The personal information we collect

We try to collect the minimum we need. Depending on how you deal with us, this may include:

Category	Examples
Identity and contact	Name, date of birth, email address, telephone number, postal address, preferred contact method and best time to call.
Education and work history	Schools, colleges attended; qualifications and grades; prior study at higher education level; employment history; voluntary and caring responsibilities; references.
Residency and funding	Nationality, residency and settled status history, previous student finance applications and any funding already received, household circumstances relevant to a funding application.
Application documents	Evidence of identity, certificates or transcripts, personal statements and drafts, and any documents you ask us to review or send on your behalf.
Communications	Notes of calls, emails and messages, and records of the advice and options we discussed with you.
Website and device	IP address, browser and device type, pages viewed and time on page, collected through cookies and similar technologies. See our separate Cookie Policy.
Payment and contract	Where you pay us a fee, the fact and amount of the payment and an invoice or transaction reference. Card details are handled by our payment provider, not by us.
Special category	Information about health, disability, access needs, care experience or ethnicity, but only where it is needed for your application or access arrangements, and only where you have chosen to give it. See the next chapter.

Health, disability and other special category information

Some of the information you may need us to handle is "special category data" under UK GDPR. In an education context this is most likely to be information about a health condition, a disability, an access requirement, care experience, or ethnicity where it is relevant to a funding question.

We will only collect this information if it is genuinely needed — for example, to ask a university for an adjustment or to answer a funding question — and we will ask for your **explicit consent** first. We will tell you what we are asking for and why. You can decline, and you can still use our service: we will simply do less of the drafting for you and you will provide it directly to the university or to Student Finance England instead.

We keep special category information to the minimum necessary, restrict who can see it, and delete it as soon as the purpose has passed in line with the retention periods in chapter 8.

Why we use your information and our lawful bases

Data protection law requires us to have a lawful basis for everything we do. The table below sets out ours. Where we rely on **legitimate interests**, we have balanced your interests and rights against ours and concluded that our interests do not override them; you can ask us for a copy of that assessment or object to the processing at any time.

What we do	Lawful basis
Respond to your enquiry and give you guidance on routes and options	Legitimate interests (helping prospective students), or steps at your request before entering a contract
Assess your circumstances and compare courses and entry routes	Steps before entering a contract, at your request
Prepare and submit an application on your behalf, or review your application	Performance of our contract with you, plus your consent for anything we send to a provider
Help you prepare or submit a student finance application, or ask a funding question	Performance of our contract with you, plus your explicit consent for sharing information with Student Finance England or a provider
Handle a health, disability or access requirement	Your explicit consent
Contact you about your application or a service you have asked for	Performance of our contract with you, or legitimate interests
Send you marketing about similar services	Consent, or the "soft opt-in" where you are an existing enquirer or customer and we gave you an opt-out when you first gave us your details
Keep accounting, tax and other statutory records	Legal obligation
Measure and improve our website and services	Legitimate interests; consent where cookies require it
Prevent and detect fraud, and protect safeguarding concerns	Legitimate interests, and legal obligation where we must report
Establish, exercise or defend legal claims	Legitimate interests

Three commitments we want to be clear about.

1. We never use your information to make, or to influence, an admissions decision or a student finance decision. Those decisions belong to the university and to Student Finance England.
2. We do not charge you a fee for a funding outcome, and we do not make our service conditional on you getting funding.
3. We do not sell your personal information, and we do not share it with third parties so that they can market their own products to you.

Who we share your information with

We share personal information only where we need to, and as follows:

- **Universities and colleges you ask us to approach.** We send only what you have asked us to send, or what the application requires. You are told what will be sent before it is sent.
- **Student Finance England and other funding bodies**, where you have asked us to act for you.
- **Our suppliers**, who provide our website hosting, email, customer records system, document storage, analytics and payment processing. They act under contract and may only use your information on our instructions.
- **Our professional advisers** — accountant, solicitors and insurers — where necessary.
- **Regulators, the police and other authorities**, where the law requires it or where we need to report a safeguarding concern.
- **A buyer or investor**, if the business is sold or restructured, in which case we would tell you before your information is transferred.

How we are paid. We receive a fee from a university or college when a student we have supported enrolls on one of their courses. We disclose this because it matters to you: it is why we tell you about the range of routes rather than only one, and why we will tell you if a route you are considering does not lead to a funded place. We do not receive any payment from Student Finance England or from you for a funding outcome.

Sending information outside the UK

Some of our suppliers may store or process information outside the UK. Where that happens we put a lawful safeguard in place — normally the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or a finding that the destination country has an adequate level of protection — and we carry out a transfer risk assessment.

Our website and our customer records are held on the Wix platform, and we use suppliers for email, document storage and payment processing. A current list of our suppliers, the purpose each serves and the countries in which they process information is available on request using the contact details published on our website.

You should be aware that if you contact us through a messaging application such as WhatsApp, that service is operated by Meta and messages are processed on its infrastructure outside the UK. If you would prefer not to use it, contact us at the contact details published on our website instead.

How long we keep your information

We do not keep personal information for longer than we need it. Our standard periods are set out below.

What it is	How long we keep it
An enquiry that does not go any further	12 months from our last contact with you
An application we helped to prepare or submit	24 months from the end of the application cycle
Records of student finance advice and support we gave	6 years, to deal with complaints and to meet limitation and accounting rules
Identity documents you send us to verify who you are	Deleted within 30 days of verification
Payment, invoice and accounting records	6 years from the end of the financial year
Marketing consent records	Until you withdraw consent, plus 24 months as evidence of what you agreed to
Complaint and dispute records	6 years from the date the matter is closed
Website analytics data	14 months

When a period ends we delete the information or, where that is not practicable, anonymise it so that it can no longer be linked to you.

How we keep your information secure

We use appropriate technical and organisational measures to protect personal information. These include encryption in transit and at rest, access controls so that staff see only what their role requires, unique accounts with multi-factor authentication, regular backups, supplier due diligence, and a written procedure for responding to a suspected incident.

If a breach occurs that is likely to result in a risk to your rights, we will tell the Information Commissioner's Office within 72 hours and tell you without undue delay where the risk to you is high.

Your rights

You have the following rights. There is no charge for exercising them, and we will normally respond within one month.

- **Access** — a copy of the personal information we hold about you, with an explanation of how we use it.
- **Rectification** — correction of information that is inaccurate or incomplete.
- **Erasure** — deletion of information we no longer need, subject to the records we are legally required to keep.
- **Restriction** — we pause use of your information while a concern is looked into.
- **Objection** — you can object to processing based on legitimate interests, including profiling, and to direct marketing at any time.
- **Portability** — a machine-readable copy of information you gave us, where we process it by automated means on a contract or consent basis.
- **Withdraw consent** — at any time, where we relied on consent. Withdrawing it does not affect what we lawfully did before.

To exercise any of these, contact us using the details published on our website. If you are unhappy with how we have handled your information you can complain to us first, and you also have the right to complain to the Information Commissioner's Office at ico.org.uk or on 0303 123 1113. We would prefer the chance to put it right first.

Automated decisions and the use of AI tools

We do not make decisions about you that are based solely on automated processing and that produce a legal or similarly significant effect. No software decides whether you are suitable for a course, whether you should apply, or what we tell you about funding.

We may use software, including AI writing and summarisation tools, to help our staff draft, check and organise documents. A member of our team reviews anything that goes to you or to a university before it does. You can ask us to review any advice or document by a person, and you can ask us what use was made of an AI tool in your case.

We do not use your personal information to train third-party AI models, and our contracts with suppliers prohibit them from doing so.

Children and younger learners

Our service is designed for adults. We do not knowingly collect information about anyone under 13, and if we discover we have, we will delete it. If you are under 18 and want our help, please ask a parent or guardian to contact us with you, and we will ask for their consent before we take any information from you.

Marketing

We will only send you marketing by email or text where you have consented, or where you are an existing customer or enquirer and the "soft opt-in" applies. Every message includes a way to unsubscribe, and unsubscribing is free and immediate. We do not share your contact details with anyone else so that they can market to you.

Cookies and similar technologies

Our website uses cookies and similar technologies. The detail — what each one does, how long it lasts and how to control it — is in our separate **Cookie Policy**, which forms part of this notice.

Changes to this notice

We may update this notice to reflect changes in what we do or in the law. The current version, its version number and the date it takes effect are shown at the top of the document. Where a change is material we will tell you directly, and we will not apply a materially different use to information we already hold without a lawful basis for doing so.