

# Article 14 Student Privacy Notice

Last Updated: 20th of July, 2026.

## 1. Introduction

This Student Privacy Notice explains how **DIGITAL SCALE LIMITED** (Company No. 17328393), trading as “**Edu4u**” (“**Edu4u**”, “**we**”, “**us**” or “**our**”), collects, uses and protects your personal data where we receive that information from an authorised third party, such as one of our authorised Agents or educational consultants, rather than directly from you.

This Privacy Notice is provided in accordance with **Article 14 of the UK General Data Protection Regulation (“UK GDPR”)**, which requires us to provide you with information about our processing of your personal data when that personal data has been obtained from a source other than you.

We process your personal data to assess your interest in educational opportunities, provide educational consultancy services, support university application processes and communicate with you where appropriate.

This Privacy Notice should be read together with our general Privacy Policy, which contains additional information about how Edu4u processes personal data.

*We process your personal data only where we have a lawful basis to do so and in accordance with applicable data protection laws.*

## 2. Who We Are

DIGITAL SCALE LIMITED (Company No. 17328393), trading as “**Edu4u**” (“**Edu4u**”, “**we**”, “**us**” or “**our**”), is the **data controller** responsible for the personal data described in this Student Privacy Notice.

Edu4u provides educational consultancy services and operates the Edu4u Agents CRM, through which authorised Agents and consultants may submit information about prospective Students who are interested in receiving guidance or support with educational opportunities and university applications.

If you have any questions about this Student Privacy Notice, our processing of your personal data, or if you wish to exercise any of your rights under applicable data protection law, you may contact our Data Protection Officer using the details below:

### Data Protection Officer

Krystian Wojtas

Email: [director@whatcollege.uk](mailto:director@whatcollege.uk)

You also have the right to lodge a complaint with the **Information Commissioner's Office (ICO)** if you believe that we have processed your personal data unlawfully or failed to comply with applicable data protection laws. We encourage you to contact us first so that we have the opportunity to address your concerns.

### **3. How We Obtained Your Personal Data**

We did not obtain your personal data directly from you. Instead, your personal data was provided to Edu4u by an authorised third party, such as one of our authorised Agents or educational consultants, who referred you to Edu4u because they believed you may be interested in our educational consultancy services or support with university applications.

The information provided to us may have been collected by the Agent during discussions with you or through another lawful means. We expect all authorised Agents and consultants to obtain and share personal data with Edu4u only where they have an appropriate lawful basis for doing so and in accordance with applicable data protection laws.

The personal data provided to Edu4u is used solely for the purposes described in this Student Privacy Notice. Edu4u does not purchase personal data from data brokers or obtain personal data from publicly available sources for the purposes of providing our educational consultancy services.

If you believe that your personal data has been provided to Edu4u without your knowledge or in circumstances that do not comply with applicable data protection law, please contact our Data Protection Officer using the contact details provided in this Student Privacy Notice.

### **4. What Personal Data We Collect**

The categories of personal data that Edu4u may receive about you from an authorised Agent or educational consultant include:

- your identity information, such as your name;
- your contact information, such as your email address and telephone number;
- information relating to your educational background, qualifications, study interests and preferred courses or institutions;
- information relating to your university application or enrolment status;
- records of communications between you, Edu4u and, where relevant, the Agent or educational consultant;
- information necessary to assess, manage and support your educational application or related services; and
- any other personal data that is reasonably necessary for the provision of our educational consultancy services.

We ask our authorised Agents and educational consultants to provide only personal data that is accurate, relevant and necessary for the purposes described in this Student Privacy Notice.

Edu4u does not intentionally request or require the submission of **special category personal data** (such as information relating to your health, racial or ethnic origin, religious or philosophical beliefs, political opinions, trade union membership, genetic data, biometric data, sex life or sexual orientation) unless this is strictly necessary, permitted by Applicable Law and supported by an appropriate lawful basis.

If we become aware that special category personal data has been provided where it is not required for the provision of our Services, we will take appropriate steps to restrict its use or delete it where appropriate and in accordance with Applicable Law.

## 5. Why We Process Your Personal Data

Edu4u processes your personal data for the purposes of providing educational consultancy services and supporting prospective Students throughout the university application process.

Depending on the circumstances, we may process your personal data to:

- assess your interest in educational opportunities, courses and institutions;
- communicate with you regarding your enquiry, referral or prospective application;
- provide information, guidance and support relating to educational programmes, admissions and student services;
- assess your eligibility for particular courses, programmes or other educational opportunities;
- facilitate and manage university or college application processes;
- maintain accurate records of enquiries, referrals and communications;
- administer and improve our educational consultancy services;
- comply with our legal and regulatory obligations; and
- establish, exercise or defend legal claims where necessary.

We will process your personal data only for purposes that are compatible with those described in this Student Privacy Notice or where otherwise permitted or required by Applicable Law.

Where we intend to use your personal data for a new purpose that is materially different from those described in this Student Privacy Notice, we will provide you with any additional information required by Applicable Law before doing so.

## 6. Our Lawful Basis for Processing

Edu4u processes your personal data only where we have a lawful basis to do so under the UK General Data Protection Regulation (“UK GDPR”) and other applicable data protection laws.

Depending on the circumstances in which your personal data is processed, we may rely on one or more of the following lawful bases:

- **Legitimate Interests** – where processing is necessary for our legitimate interests in providing educational consultancy services, managing referrals, supporting prospective Students, improving our Services and operating our business, provided that your interests, rights and freedoms do not override those legitimate interests.
- **Performance of a Contract or Steps Prior to Entering into a Contract** – where processing is necessary to take steps at your request before entering into a contract or to perform a contract for the provision of our Services.
- **Legal Obligation** – where processing is necessary for Edu4u to comply with a legal or regulatory obligation, including obligations relating to taxation, fraud prevention, regulatory compliance or the establishment, exercise or defence of legal claims.
- **Consent** – where we are required by Applicable Law to obtain your consent before carrying out a particular processing activity. Where we rely on your consent, you may withdraw it at any time without affecting the lawfulness of any processing carried out before it was withdrawn.

Where we process special category personal data, we will do so only where an appropriate condition under applicable data protection law also applies.

If you would like further information about the specific lawful basis that applies to the processing of your personal data, you may contact our Data Protection Officer using the contact details provided in this Student Privacy Notice.

## 7. Who We Share Your Personal Data With

Edu4u may share your personal data where it is necessary for the purposes described in this Student Privacy Notice and where permitted or required by Applicable Law.

Depending on the circumstances, we may share your personal data with:

- educational institutions, universities, colleges or other education providers in connection with your application or enquiry;
- authorised employees, consultants and Agents of Edu4u who require access to your personal data in order to provide our Services;
- carefully selected service providers who assist us in operating our business and delivering our Services, including providers of hosting, information technology, communications, customer relationship management and administrative support services;
- professional advisers, including legal, accounting and regulatory advisers, where necessary;

- law enforcement agencies, courts, regulators or other public authorities where disclosure is required or permitted by Applicable Law; and
- any other person or organisation where you have requested or authorised us to do so, or where disclosure is otherwise permitted or required by Applicable Law.

Where we engage third-party service providers to process personal data on our behalf, we require them to process that personal data only in accordance with our instructions, to maintain appropriate security measures and to comply with applicable data protection laws.

Edu4u does not sell your personal data to third parties.

## **8. International Transfers**

Edu4u stores and processes personal data primarily within the United Kingdom.

Where it is necessary to transfer your personal data outside the United Kingdom, Edu4u will ensure that such transfers are carried out in accordance with applicable data protection laws and that appropriate safeguards are implemented to protect your personal data.

Such safeguards may include:

- transferring personal data to countries that have been recognised as providing an adequate level of protection for personal data;
- entering into legally approved contractual safeguards, such as the International Data Transfer Agreement (IDTA) or other recognised transfer mechanisms; or
- relying on another lawful transfer mechanism permitted under Applicable Law.

Further information about any international transfers and the safeguards we apply may be obtained by contacting our Data Protection Officer using the contact details provided in this Student Privacy Notice.

## **9. How Long We Keep Your Personal Data**

Edu4u will retain your personal data only for as long as is reasonably necessary to fulfil the purposes for which it was collected, including providing our educational consultancy services, managing referrals, supporting university applications, complying with our legal and regulatory obligations, resolving disputes and enforcing our legal rights.

The length of time for which we retain personal data depends on a number of factors, including:

- the nature and purpose of the personal data;
- the services being provided to you;

- any applicable legal, regulatory or contractual requirements;
- our legitimate business needs; and
- whether the personal data is required for the establishment, exercise or defence of legal claims.

When your personal data is no longer required for these purposes, we will securely delete, anonymise or otherwise dispose of it in accordance with our data retention policies and applicable data protection laws.

Where applicable, Edu4u may retain certain information for longer periods where required or permitted by Applicable Law, including for legal, regulatory, accounting, audit or fraud prevention purposes.

## 10. Your Rights

Subject to applicable data protection laws, you have a number of rights in relation to your personal data. These rights may apply in different circumstances and may be subject to certain legal exemptions or limitations.

Depending on the circumstances, you may have the right to:

- **request access** to the personal data we hold about you;
- **request the correction** of inaccurate or incomplete personal data;
- **request the deletion** of your personal data where there is no lawful reason for us to continue processing it;
- **request the restriction** of the processing of your personal data in certain circumstances;
- **object to the processing** of your personal data where we rely on legitimate interests as our lawful basis for processing;
- **request the transfer** of your personal data to you or another organisation, where the right to data portability applies;
- **withdraw your consent** at any time where we rely on your consent as the lawful basis for processing, without affecting the lawfulness of any processing carried out before your consent was withdrawn; and
- **lodge a complaint** with the Information Commissioner's Office (ICO) if you believe that your personal data has been processed unlawfully.

If you wish to exercise any of your rights, please contact our Data Protection Officer using the contact details provided in this Student Privacy Notice.

We will consider and respond to your request in accordance with applicable data protection laws. In some circumstances, we may ask you to provide additional information to verify your identity before responding to your request.

Where applicable, we will explain if we are unable to comply with your request because an exemption or other lawful basis applies.

## 11. Contact Us

If you have any questions about this Student Privacy Notice, our processing of your personal data, or if you wish to exercise any of your rights under applicable data protection laws, please contact our Data Protection Officer using the details below:

**DIGITAL SCALE LIMITED**

Trading as **Edu4u**

**Registered Office:**

128 City Road  
London  
EC1V 2NX  
United Kingdom

**Data Protection Officer:**

**Krystian Wojtas**

**Email:**

**[director@whatcollege.uk](mailto:director@whatcollege.uk)**

We will make reasonable efforts to respond to your enquiry or request without undue delay and in accordance with applicable data protection laws.

If you remain dissatisfied with how we have handled your personal data or your request, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**, the UK's independent supervisory authority for data protection matters. We encourage you to contact us first so that we have the opportunity to address your concerns.

## 12. Changes to This Student Privacy Notice

Edu4u may update or amend this Student Privacy Notice from time to time to reflect changes in applicable data protection laws, regulatory guidance, our business operations or the way in which we process personal data.

Where we make material changes to this Student Privacy Notice that affect how your personal data is processed or your rights, we will take reasonable steps to notify you where appropriate and as required by Applicable Law.

The most current version of this Student Privacy Notice will be made available through our website or by such other means as Edu4u considers appropriate.

We encourage you to review this Student Privacy Notice periodically to remain informed about how we collect, use and protect your personal data.

**Last Updated:** 20/07/2026.