

Privacy Notice

Last updated: 20 September 2026

UniSphere Private Limited ("**UniSphere**", "**we**", "**us** or "**our**") respects your privacy and is committed to handling your personal information fairly, transparently and securely.

This Privacy Notice explains how we collect, use, store, disclose and protect personal information when you interact with UniSphere, including when you:

- visit or use our website;
- contact us;
- submit an enquiry;
- book or attend a Discovery Call;
- communicate with us by email, telephone, WhatsApp, social media or other communication channels;
- enquire about or purchase our services;
- become a UniSphere student or customer;
- use our student dashboard or other UniSphere systems;
- receive support with course and university decisions, applications, documents, offers, CAS, visa preparation, accommodation, arrival, student support or career-related services; or
- otherwise interact with us.

This Privacy Notice should be read together with our **Terms & Conditions, Refund & Cancellation Policy, Cookie Policy** and any other privacy information we may provide to you at the point of collection.

1. Who we are

The organisation responsible for your personal information is:

UniSphere Private Limited

Company number: 17382889

Registered office:

139 Harrow View
Harrow

United Kingdom
HA1 4SX

Website: www.unisphere.org.uk

General enquiries: info@unisphere.org.uk

For privacy and data protection enquiries, you can contact us using the email address above.

UniSphere is generally the **data controller** for the personal information described in this Privacy Notice. This means that we determine the purposes for which personal information is processed and the manner in which it is processed.

Where another organisation processes personal information on our behalf, that organisation may act as a **data processor**.

2. Our approach to your privacy

We believe that personal information should be handled responsibly and only used where there is a legitimate and appropriate reason to do so.

We aim to:

- collect only information that is reasonably necessary for the relevant purpose;
- explain clearly why we need information;
- use information only for appropriate and lawful purposes;
- keep information accurate where reasonably possible;
- retain information only for as long as reasonably necessary;
- protect information using appropriate security measures;
- respect your data protection rights; and
- be transparent about how your information is used and shared.

We do not sell your personal information.

3. Personal information we may collect

The information we collect depends on how you interact with UniSphere and the services you request.

Information you provide to us

This may include:

- full name;
- date of birth;
- email address;
- telephone or mobile number;
- country of residence;
- nationality;
- educational history;
- academic qualifications;
- course and subject interests;
- preferred universities and locations;
- intended intake;
- study plans;
- career interests and goals;
- information about your budget or funding arrangements where relevant;
- information relating to education finance or loans where relevant;
- passport or identity information where required;
- visa or immigration-related information where required for the services you request;
- application information;
- academic and supporting documents;
- accommodation preferences;
- travel and arrival information;
- information provided during counselling or Discovery Calls;
- information contained in communications with us;
- payment and transaction information; and
- other information that you voluntarily provide to us.

We will seek to collect information that is relevant and reasonably necessary for the purpose for which it is being used.

4. Information relating to your UniSphere journey

If you become a UniSphere student or customer, we may create or receive information relating to your journey, including:

- onboarding information;
- profile information;
- application details;
- universities and courses being considered;
- documents and document status;
- application progress;

- tasks and deadlines;
- university decisions and offers;
- offer conditions;
- CAS-related progress;
- visa preparation progress;
- pre-departure activities;
- appointments;
- communications;
- payments;
- support requests;
- student journey progress; and
- information necessary to provide services included within your chosen package.

Our student dashboard may use this information to help you understand your current position, outstanding tasks and appropriate next steps.

5. Information we receive from other sources

In some circumstances, we may receive personal information from sources other than you.

These may include:

- universities and higher education institutions;
- application or admissions platforms;
- education partners;
- organisations or partners through whom you have requested our services;
- your authorised representatives;
- accommodation or service providers;
- publicly available sources; or
- other organisations involved in providing services you have requested.

Where we obtain personal information from another source, we will handle it in accordance with applicable data protection law and provide any information required by law about the source and our use of that information.

6. Information collected automatically

When you visit or use our website, certain information may be collected automatically, depending on the technologies used on the website.

This may include:

- IP address;
- browser type;
- device information;
- operating system;
- approximate location derived from technical information;
- pages visited;
- time spent on pages;
- referring website;
- interaction with website features; and
- information collected through cookies or similar technologies.

Our **Cookie Policy** explains how cookies and similar technologies are used and how you can manage your preferences.

7. How we use your personal information

We may use personal information for the following purposes.

A. Providing and managing our services

We may use your information to:

- understand your circumstances and study plans;
- provide counselling and guidance;
- help you explore courses, universities, cities and study options;
- help you make informed education decisions;
- assist with application preparation;
- review relevant documents;
- support application submission and progress;
- communicate with universities and relevant partners where appropriate;
- provide offer and condition support;
- provide CAS-related support;
- provide visa preparation and guidance;
- provide pre-departure support;
- provide accommodation-related guidance or support where included in your service;
- provide arrival and settling-in support where included in your service; and
- provide career and employability support where included in your service.

B. Managing your student account and dashboard

We may use your information to:

- create and manage your UniSphere account;
- provide access to the student dashboard;
- manage your documents;
- record application progress;
- assign tasks;
- identify relevant next steps;
- provide reminders;
- manage appointments;
- record communications; and
- provide information relevant to your journey.

C. Communication

We may use your information to:

- respond to enquiries;
- arrange Discovery Calls;
- send booking confirmations and reminders;
- provide service-related communications;
- notify you of application updates;
- notify you about offers, conditions, CAS or visa-related steps;
- remind you about important deadlines or tasks;
- respond to support requests; and
- communicate other information necessary to provide the services you have requested.

D. Payments and administration

We may process information to:

- process payments;
- issue invoices or payment records;
- administer your service agreement;
- maintain appropriate financial and business records; and
- manage refunds, cancellations or other financial administration.

E. Improving UniSphere

We may use information to:

- understand how our services are used;
- improve our website;
- improve our student experience;
- improve our internal processes;

- maintain and improve our systems;
- monitor service performance;
- identify technical problems;
- protect the security of our services; and
- develop and improve our services.

Where reasonably possible, information used for analytical or improvement purposes will be aggregated, anonymised or otherwise handled in a manner that reduces identification of individuals.

F. Marketing

Where permitted by applicable law, we may use personal information to send information about UniSphere, our services, events, updates or relevant opportunities.

Where consent is required, we will obtain it before sending the relevant marketing communications.

You can withdraw your consent or opt out of marketing communications at any time.

We will respect your marketing preferences and will not use your personal information for unlawful direct marketing.

8. Our lawful bases for processing

Data protection law requires us to have an appropriate lawful basis for processing personal information.

Depending on the circumstances, we may rely on one or more of the following lawful bases:

Contract

We may process information where it is necessary to enter into or perform a contract with you.

This may include providing a paid UniSphere service, managing your account, supporting your application or delivering services included in your chosen package.

Steps at your request before entering into a contract

We may process information where you ask us to take steps before entering into a service agreement.

For example, this may apply when you provide information during an enquiry or Discovery Call so that we can understand whether our services may be suitable for you.

Legitimate interests

We may process information where it is necessary for our legitimate interests, provided that those interests are not overridden by your rights and interests.

Our legitimate interests may include:

- responding to enquiries;
- managing and improving our services;
- maintaining business records;
- protecting our systems;
- preventing misuse or fraud;
- managing customer relationships;
- improving website performance; and
- operating and developing our business responsibly.

Where we rely on legitimate interests, we will consider whether the processing is necessary and proportionate and whether your interests, rights or freedoms require stronger protection.

Consent

We may rely on your consent where consent is the appropriate lawful basis.

Where consent is required, we will seek it in an appropriate manner.

You may withdraw consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

Legal obligation

We may process personal information where necessary to comply with a legal or regulatory obligation.

We maintain appropriate internal records of the lawful bases relied upon for our processing activities.

9. Special categories of personal information

Certain types of personal information receive additional protection under data protection law. These can include information relating to health, racial or ethnic origin, religious or philosophical

beliefs, biometric information used for identification, sexual orientation and certain other categories.

UniSphere does not routinely seek to collect special category information unless it is reasonably necessary for a particular service or purpose.

If we need to process special category information, we will ensure that we have both:

1. an appropriate lawful basis under applicable data protection law; and
2. an appropriate additional condition for processing special category information.

Where appropriate, we may ask for explicit consent.

We will seek to minimise the amount of sensitive information collected and will only use it for appropriate purposes.

10. Sharing your personal information

We may share relevant personal information with third parties where there is a lawful and appropriate reason to do so.

Depending on your circumstances and the services you request, these may include:

- universities and higher education institutions;
- application and admissions platforms;
- education partners;
- accommodation providers;
- travel or arrival service providers;
- visa or immigration-related service providers where appropriate;
- payment service providers;
- CRM and student-management technology providers;
- email and communication service providers;
- website hosting and cloud service providers;
- appointment and booking service providers;
- analytics and security service providers;
- professional advisers;
- insurers or other relevant service providers;
- government, regulatory or law-enforcement authorities where legally required; and
- other organisations where you have requested or authorised us to provide a service.

We aim to share only information that is reasonably necessary for the relevant purpose.

Where a third party processes information on our behalf, we will take appropriate steps to ensure that suitable contractual, confidentiality and security arrangements are in place.

11. Third-party service providers

UniSphere uses third-party technology and service providers to help operate its business and provide services.

These may include providers of:

- CRM and student management systems;
- payment processing;
- email and communications;
- website hosting;
- cloud storage;
- appointment and booking services;
- analytics;
- cybersecurity and technical support; and
- other business technology services.

The providers we use may change as UniSphere develops.

Where appropriate, we will review the privacy, security and data-processing arrangements of relevant providers and put appropriate contractual arrangements in place.

12. International transfers

Some organisations or service providers we use may process personal information outside the United Kingdom.

Where personal information is transferred outside the UK, we will take appropriate steps to ensure that the transfer is lawful and that appropriate safeguards are in place as required by applicable data protection law.

Depending on the circumstances, this may include an applicable adequacy decision or appropriate contractual or other safeguards.

Where required by law, we will provide further information about relevant international transfers and safeguards.

13. How long we keep your information

We retain personal information only for as long as reasonably necessary for the purposes for which it was collected.

The appropriate retention period may depend on:

- the nature of the information;
- the purpose for which it was collected;
- whether you are an active or former customer;
- the services provided;
- legal, regulatory and accounting requirements;
- the need to resolve disputes;
- the need to establish, exercise or defend legal claims; and
- legitimate business requirements.

Different categories of information may therefore be retained for different periods.

When personal information is no longer required, we will take appropriate steps to securely delete, destroy or anonymise it, subject to any legal or legitimate requirement to retain it.

UniSphere will maintain internal retention arrangements appropriate to the nature of the information it holds.

14. Data security

We take appropriate technical and organisational measures designed to protect personal information against:

- unauthorised access;
- accidental loss;
- destruction;
- alteration;
- unauthorised disclosure;
- misuse; and
- other unlawful or unauthorised processing.

Access to personal information is intended to be limited to people and service providers who reasonably need access for legitimate business purposes.

Our systems may include access controls, authentication, permissions, secure communications, backups, monitoring and other appropriate safeguards.

However, no internet-based system or method of electronic transmission can be guaranteed to be completely secure.

If we become aware of a personal data breach that requires notification under applicable law, we will take appropriate steps to investigate, contain and address the incident and make any notifications required by law.

15. Your data protection rights

Depending on the circumstances and subject to applicable legal conditions and exemptions, you may have rights including:

- **Right to be informed** — to understand how your personal information is used.
- **Right of access** — to request access to personal information we hold about you.
- **Right to rectification** — to request correction of inaccurate or incomplete information.
- **Right to erasure** — to request deletion of personal information in certain circumstances.
- **Right to restriction** — to request restriction of processing in certain circumstances.
- **Right to object** — to object to certain processing, including certain processing based on legitimate interests and direct marketing.
- **Right to data portability** — in certain circumstances, to receive certain information in a structured, commonly used and machine-readable format and/or request its transfer to another organisation.
- **Right to withdraw consent** — where we rely on consent as our lawful basis.

These rights are not absolute and may be subject to specific legal conditions or exemptions.

Further information about your rights is available from the Information Commissioner's Office.

16. Your right to object

Where we process your personal information based on legitimate interests, you may have the right to object to that processing.

You also have an absolute right to object to the use of your personal information for direct marketing.

If you object to direct marketing, we will stop using your personal information for that purpose, subject to any applicable legal requirements.

You can exercise your rights by contacting us using the details below.

17. Withdrawing consent

Where we rely on your consent, you may withdraw your consent at any time.

Withdrawal of consent will not affect the lawfulness of processing that took place before you withdrew your consent.

Where appropriate, we will make withdrawing consent as straightforward as giving it.

You can contact us at:

info@unisphere.org.uk

18. Information you are required to provide

Some information may be necessary for us to provide a service or perform our contractual obligations.

For example, certain personal, academic, application or identity information may be necessary to provide an application-related service.

Where particular information is required, we will seek to explain this to you.

If you choose not to provide information that is reasonably necessary for a particular service, we may not be able to provide that service or complete the relevant activity.

We will not ask you to provide information that is unnecessary for the relevant purpose.

19. Automated decision-making and profiling

UniSphere may use technology to organise information, track progress, identify outstanding tasks, provide reminders or suggest an appropriate next step within the student journey.

For example, our student dashboard may display a **Next Best Action** based on information about your current journey stage and outstanding activities.

These tools are intended to support students and UniSphere staff.

UniSphere does not intend to make decisions that have legal or similarly significant effects on individuals solely through automated processing.

Where applicable law provides specific rights or safeguards in relation to automated decision-making or profiling, we will comply with those requirements.

20. Children and young people

UniSphere's services are primarily intended for students and prospective students.

Some students may be under the age of 18 when they interact with us.

Where we process information relating to a person under 18, we will take appropriate account of their age, circumstances and applicable data protection requirements.

We will seek to collect only information that is reasonably necessary for the relevant purpose.

Where appropriate, we may require a parent, guardian or other authorised person to be involved in certain aspects of a student's journey, subject to applicable law and the student's circumstances.

21. Marketing communications

We may communicate with you about UniSphere services, updates or relevant information where permitted by applicable law.

Where consent is required, we will obtain consent before sending the relevant marketing communications.

You can opt out of marketing communications at any time by:

- using the unsubscribe option included in a marketing communication; or
- contacting us at info@unisphere.org.uk.

Please note that opting out of marketing communications will not normally stop essential service-related communications, such as application updates, appointment information, payment information, security notifications or other communications necessary to provide services you have requested.

22. Complaints

We want to resolve privacy concerns fairly and directly.

If you have a concern about how we have handled your personal information, please contact us first:

UniSphere Private Limited

Email: info@unisphere.org.uk

We will consider your concern and take reasonable steps to investigate and respond.

You also have the right to complain to the UK's data protection regulator:

Information Commissioner's Office (ICO)

Website: <https://ico.org.uk/>

Telephone: 0303 123 1113

Address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

The ICO is the UK's independent supervisory authority for data protection.

23. Changes to this Privacy Notice

We may update this Privacy Notice from time to time to reflect:

- changes to our services;
- changes to our website;
- changes to our systems or technology;
- changes to how we process personal information;
- changes to our business operations; or
- changes in applicable legal or regulatory requirements.

Where appropriate, we will provide additional notice of significant changes.

The latest version will always be made available on our website and will show the date on which it was last updated.

24. Contact us

If you have any questions about this Privacy Notice, our use of personal information or your data protection rights, please contact:

UniSphere Private Limited

Company number: 17382889

Registered office:

139 Harrow View
Harrow
United Kingdom
HA1 4SX

Email: info@unisphere.org.uk

Website: www.unisphere.org.uk

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