



ABBNEY ROAD

INSTITUTE

Abbey Road Institute Mumbai

Privacy & Data Protection Policy

Last updated: October 2025

Issuer: Abbey Road Institute Mumbai (trading name of A R INSTITUTE LLP, India)

1. Purpose and Status

- 1.1. This Policy explains how ARI Mumbai (“ARI”, “we”, “us”) processes digital personal data of adult students, applicants, alumni, employees, contractors, visitors and website users, consistent with the Digital Personal Data Protection Act, 2023 (“DPDP Act”). This includes circumstances where personal data is collected first by Abbey Road Training Limited (London) or other Abbey Road Institute entities (“Global Team”) and subsequently shared with ARI Mumbai.
- 1.2. ARI does not enrol persons under 18; any incidental children’s data (e.g., a visitor’s information) is handled with heightened care per this Policy.

2. Roles and Controllers

- 2.1. **Primary role (India):** ARI Mumbai acts as the Data Fiduciary for processing it determines in India (admissions, academic administration, student support, studio operations, billing, HR, security, websites, and marketing originating in India).
- 2.2. **Global Team (London):** Abbey Road Training Limited (London) and/or other Abbey Road Institute entities may (i) act as an Independent Controller and collect personal data directly (e.g., via global enquiry/admissions/alumni platforms) and later share such data with ARI; and/or (ii) act as a Processor/Service Provider to ARI for tools and services used locally.
- 2.3. ARI and the Global Team will determine roles for each system in the relevant privacy notice or contract and provide appropriate contact points for data rights.

Abbey Road **Institute** Mumbai

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- 2.4. Typical first-collection by the Global Team includes (illustrative): global enquiry or application forms, event/open-day registrations hosted on global systems, alumni/community platforms, and certain marketing or analytics tools operated from the UK/EEA. RI Mumbai acts as the **Data Fiduciary** for processing it determines in India (admissions, academic administration, student support, studio operations, billing, HR, security, websites, and marketing originating in India).

3. Key Definitions

- 3.1. “Personal data”, “Processing”, “Data Fiduciary”, “Data Principal”, “Consent”, and “Personal data breach” have the meanings under the DPDP Act.
- 3.2. References to “GDPR/UK-GDPR” mean Regulation (EU) 2016/679 and the UK General Data Protection Regulation as retained in UK law, as applicable.

4. Categories of Personal Data

- 4.1. Identification and contact data (e.g., name, address, phone, email, ID proofs), admissions and academic records, communications, fee/payment data, CCTV/access logs, device/technical data from our websites, and HR/contractor data. Data may be collected by ARI or directly by the Global Team and then shared with ARI, depending on the system used.
- 4.2. Sensitive data may arise in limited contexts (e.g., medical accommodation requests) and is handled with appropriate safeguards, including obligations under the Mental Healthcare Act for mental-health information.

5. Purposes of Processing

- 5.1. Admissions, enrolment and academic administration; studio and facility scheduling; teaching and assessment; student support; event management; communications and marketing (including enquiry responses); fee billing and accounting; safety and incident response; legal or regulatory compliance; HR administration; vendor management; website operation and analytics (cookies/SDKs); and record-keeping.
- 5.2. Where the Global Team acts as an Independent Controller and collects data first, the Global Team determines compatible purposes under its privacy notices and shares relevant data with ARI for ARI’s local purposes described above.

6. Legal Bases (DPDP Act)

- 6.1. Consent that is free, specific, informed, unambiguous and given by clear affirmative action, limited to necessary data for specified purposes; with the right to withdraw consent.

Abbey Road Institute Mumbai

- 6.2. Other lawful grounds permitted by the DPDP Act (e.g., compliance with law; performance of employment/HR obligations; disaster/medical emergencies; or other legitimate uses provided by the Act).

7. Disclosures, Service Providers and Group Sharing

- 7.1. We share personal data with service providers (IT/cloud, communications, payments, analytics), professional advisers, auditors, and authorities where required by law or to protect rights/safety.
- 7.2. Processors act only on documented instructions, implement appropriate security, and are bound by contract.
- 7.3. Where the Global Team provides platforms/services to ARI or operates its own systems, data may be shared intra-group on a role-appropriate basis (see Section 2), including onward sharing from the Global Team to ARI where the Global Team collected the data first.

8. Cross-Border Transfers and GDPR/UK-GDPR Alignment

- 8.1. **International locations.** Personal data may be transferred to and processed in countries outside India, including the United Kingdom and the European Economic Area (EEA), and other jurisdictions where our service providers or the Global Team are located. In many cases, initial collection and storage occur on Global Team systems in the UK/EEA, followed by onward transfer to ARI in India for local processing.
- 8.2. **DPDP compliance.** Cross-border transfers are performed in accordance with the DPDP Act and any Government notifications in force, and are supported by contractual and technical measures proportionate to risk.
- 8.3. **When GDPR/UK-GDPR applies.** If and to the extent the Global Team acts as an Independent Controller and GDPR/UK-GDPR governs their processing (for example, systems operated from the UK, or processing in the EEA/UK), the Global Team will comply with GDPR/UK-GDPR requirements, including: (a) identifying a lawful basis (e.g., contract, legitimate interests, consent); (b) providing appropriate privacy information; (c) honouring data-subject rights under the applicable regime; and (d) implementing appropriate transfer safeguards (e.g., the UK International Data Transfer Agreement (IDTA) or UK Addendum to the EU Standard Contractual Clauses; EU Standard Contractual Clauses where applicable), plus organisational/technical measures for onward transfers from the UK/EEA to India.
- 8.4. **Co-ordination.** ARI Mumbai will reasonably facilitate or route requests to the correct controller (ARI or Global Team), including where data was first collected by the Global Team and later shared with ARI, and will ensure that, where the Global Team processes Indian data, contractual protections and security measures are in place consistent with this Policy and applicable law.
- 8.5. **Contact points.** See Section 10 for how to exercise rights or raise cross-border questions; we will connect you with the appropriate controller where needed.

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9. Security

- 9.1. We implement technical and organisational measures appropriate to the risk, including access controls, encryption where appropriate, secure configuration, logging/monitoring and incident response.

10. Data Subject Requests and Grievances

- 10.1. Data Principals may request access/correction, withdraw consent, and make grievances regarding processing. We will respond within reasonable timeframes in accordance with the DPDP Act.
- 10.2. GDPR/UK-GDPR rights (where applicable): If your data was first collected by the Global Team and is processed by a Global Team controller under GDPR/UK-GDPR, you may exercise rights (e.g., access, rectification, erasure, restriction, objection, portability) with that controller. If you contact ARI Mumbai, we will route your request accordingly.
- 10.3. ARI shall maintain a Grievance Officer / Data Protection Contact and publish contact details on its website.

11. Retention

- 11.1. We retain personal data only for as long as necessary for the purposes set out above or as required by law, after which it is securely deleted or anonymised.

12. Websites, Cookies and Tracking

- 12.1. Our websites may use cookies or similar technologies for core functionality, analytics and performance. Where required, we provide consent banners/controls. Users may manage settings via browser/device options.

13. Special Categories: Mental-Health Information

- 13.1. Mental-health information is protected by the Mental Healthcare Act, 2017; ARI respects the right to confidentiality, subject to lawful exceptions (e.g., to prevent a serious threat to life or under a lawful order).

14. Contacts and Updates

- 14.1. **India Data/Privacy Contact:**
Abbey Road Institute Mumbai
mumbai+privacy@abbeyroadinstitute.com

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14.2. Global Team (UK) Data/Privacy Contact:

Abbey Road Training Limited

privacy@abbeyroadinstitute.com

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