



## **Royal Academy of Dramatic Art**

### **Privacy Notice**

In this document, “you” and “your” means the student; “we”, “us” and “our” mean RADA.

#### **1. Introduction**

- 1.1. This Privacy Notice explains how RADA (we, us, our) collect, manage and use your personal information. It also explains what rights you have to access or change your personal data.
- 1.2. This Privacy Notice applies to our interactions with you in relation to our business and services whether via our website [www.rada.ac.uk](http://www.rada.ac.uk), by telephone, by SMS, by email, in person at our one of our teaching spaces or theatres or at a venue operated by a third party. It also applies to our interactions with you when working off-site such as during our outreach workshops.
- 1.3. This notice aims to apply to you if you are a user of our website, a customer, a donor, graduate, student, prospective student or Outreach participant. This is a non-exhaustive list and may also include other interactions which are not specifically listed here.

#### **2. About us**

- 2.1. The Royal Academy of Dramatic Art (RADA) is an educational institution, dedicated to world leading training in the dramatic arts. It was founded in 1904 and is established by a Royal Charter. We are a registered charity (number 312819) and registered as a Higher Education Provider with the Office for Students (UKPRN 10009292). We are governed by our Council who act as trustees for charity law purposes.
- 2.2. RADA in Business Limited is a wholly owned subsidiary of RADA (company registration 03999577). RADA in Business Limited provides training, coaching and consultancy services, and manages the commercial hire of RADA’s spaces.
- 2.3. In this Privacy Notice you will see when we collect your personal information, ‘RADA’ (we, us, our) refer to the Council of RADA, together with RADA in Business Limited. We share personal information responsibly between these components of the organisation.
- 2.4. Each of the components acts as a data controller of your personal information and is registered with the Information Commissioner’s Office. If you have a question or concern about personal data at RADA, please contact the Registrar and Secretary, who is the Data Protection Officer for RADA.

### 3. Information we may collect about you

#### 3.1. Information that you provide to us

3.1.1. We will collect any information that you provide to us when you:

- a. Make an enquiry, submit correspondence, provide feedback or make a complaint over the phone, by email or on our website
- b. Apply for one of our courses and set up an account on Cognito, Embark or other admissions systems used by RADA
- c. Attend an interview, audition and/or workshop as a prospective student for on of our courses
- d. Register as a student
- e. Apply for scholarship or hardship funding
- f. Attend a short course, business course or other learning activity
- g. Are a member of one of our admissions panels and register to use our admissions systems and software
- h. Attend an outreach workshop or other activity
- i. Make a donation and/or Gift Aid Declaration
- j. Update your personal information or account details
- k. Subscribe to our newsletter and mailing lists
- l. Purchase a ticket and/or attend our events or performances on-site
- m. Provide, or offer to provide, us with goods or services
- n. Submit a CV or an application for a job vacancy
- o. Attend an interview for a job vacancy and/or
- p. 'follow', 'like', 'comment' or interact with our social media accounts, including Facebook, Instagram, Twitter, TikTok

3.1.2. Information you provide to us may include:

- a. **Identity and contact data:** title, names, addresses, date of birth, gender, email addresses and telephone numbers
- b. **Account profile data:** if you're registering for an account on Embark or another admissions system as a prospective student; booking a course; booking tickets to a production or event, you may also provide a username, password and other personal preferences
- c. **Financial information:** if you are using our website to purchase products or services, or applying for a course you may provide billing address, payment information (credit/debit card and/or bank account details); details related to your funding such as eligibility for student loans, scholarships and bursaries; details of your declaration if Gift Aid is applicable to any donation that you make
- d. **Student admission data:** if you are a student, or prospective student of RADA you will be asked to provide information identity and contact data (point a above) as well as nationality and domicile, previous academic qualifications (academic records and results) and experience, a 'headshot' photograph and other data items needed for monitoring purposes, as per 3.2.2 and 3.2.3 below
- e. **Graduate Records:** if you are a graduate, you may provide details of your current employment, or creative projects, or information relating to work being offered that you want us to pass on to other graduates
- f. **Employment and background data:** if you are submitting a job application you may provide additional information about your academic and work history, previous income level, references and other relevant information

- g. **Survey data:** from time to time, we might ask if you would be willing to participate in our surveys, if you agree, we will also collect any information that you provide as part of that survey.
- h. **General Information:**
  - Your preferences, interests and previous activities with RADA, such as performances and courses you have attended
  - Your views, opinions, questions and comments
  - Records of your correspondence with us

3.1.3. Information we collect about you and your activity with RADA. This includes:

- a. **Transactional data:** we will collect information related to your transactions, including the date and time, the amounts charged and other related transaction details
- b. **Website usage and technical data:** we will collect certain information about how you use our website and the device that you use to access our website, even where you have not created an account or logged in. This will include your geographical location, device information (such as your hardware model, mobile network information, unique device identifiers), the data transmitted by your browser (such as your IP address, date and type of the request, content of the request regarding the specific site, time zone settings, access status/HTTP status code, volume of data transmitted, browser type and version, language settings, time zone settings referral source, length of visit to the website, date and time of the request, operating system and interface) number of page views, the search queries you make on the website and similar information. This information may be collected by a third-party website analytics service provider on our behalf and/or may be collected using cookies or similar technologies. For more information on cookies please see under the heading “Cookies” below.
- c. **Images:** when we take photographs or film in our premises. We will endeavour to let you know by printed notices whenever such filming or photography will take place; images of you when you visit our premises as we operate CCTV for your security and that of our staff, students and other visitors; if we record video conferences which you attend.
- d. **Information collected during our Access and Participation (A&P) workshops:** if you attend one of our workshops as part of our RADA Connect programme or other outreach activity, we will keep a record of your attendance, and other relevant details help identify you and track your progression if you subsequently apply to one of our Higher Education courses
- e. **Audio or video recording:** we may retain an audio or video record of an audition or an interview you attend for internal moderation purposes only, to ensure consistency and accuracy of decision making
- f. **Academic information:** about course attendance and progress including assessments and recordings of performances
- g. **Correspondence:** with RADA and third parties across RADA’s system

3.2. Information we receive from third parties about you

3.2.1. In certain circumstances, we will receive information about you from third parties, for example:

- a. **Employers and referees:** if you are a job applicant we may contact your recruiters, current and former employers and/or referees, who may be based inside or outside the EU, to provide information about you and your application;
- b. **Academic references:** if you are a prospective student we may contact your academic referees to provide information about your application, and we may also receive information about you from third parties such as the Student Loans Company (SLC), including SFE, SAAS, SFNI, Student Universal Support Ireland (SUSI)
- c. **Service Providers:** We may collect personal information from our website developer (Fabrique), IT support provider (CaraNetworks) and payment services (Spektrix, Stripe, PayPal, WorldPay) who are based inside the EU. Our video conferencing host (Microsoft Teams/Zoom) are based in the US although are fully compliant with the requirements of the US-EU and Swiss Privacy Shields;
- d. **Social media:** you may post reviews or other content relating to RADA or similar organisations via third-party social media platforms and channels, such as Twitter, Facebook, TikTok or Instagram. We currently use **social media plugins** from the following service providers who are based both inside and outside the EU: Facebook, YouTube, Twitter, TikTok and Instagram. By providing your social media account details you are authorising that third-party provider to share with us certain information about you;
- e. **Attendance data:** we may collect information about your attendance through electronic swipe cards or other electronic methods such as timetabling software which will provide information about your access to our spaces including the frequency and location
- f. **Medical information:** if you are a student or prospective student we may receive an assessment from your medical practitioner, counsellor or other medical professional in order to assess your fitness to train or to ascertain the type and level of reasonable adjustment required in respect of our Higher Education provision. If you are an employee or prospective employee we may receive an assessment from your medical practitioner, occupational health adviser or other medical professional in order to assess your fitness to work or to ascertain the type and level of reasonable adjustment required in respect of our obligations as an employer
- g. **Publicly available information:**
  - from trusted sources (such as Who's Who, Debrett's People of Today) that we may use to help us to tailor our communications, and the experiences and events we offer to you
  - we are sometimes required to undertake checks on the sources of funds for donations and other contributions from supporters, and this may include information obtained from third parties such as, for example, Companies House.
  - We may add information from publicly available sources including data from, for example, reputable newspapers, Companies House, or LinkedIn/Twitter. We do this in order to manage our fundraising effectively and to give you the best experience by tailoring our approaches to you according to your interests as well as the level at which you could potentially support us.

We might also receive information about you from third parties if you have indicated to such third party that you would like to hear from us.

We recommend that you check the privacy policy and statements of any third parties that you provide information to, as we are not responsible for the way in which they use, share or make available your personal information.

## Special categories of personal data

- 3.2.2. We may need to collect special categories of personal data from you. Special categories of data include details about your race or ethnicity, religious or philosophical beliefs, gender, date of birth, income, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Depending on the circumstances we will also collect information about criminal convictions and offences as described in more detail below.
- 3.2.3. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. The main circumstances in which we may lawfully process special categories of personal information are:
- a. in limited circumstances, with your explicit written consent;
  - b. where we need to carry out our legal obligations or exercise rights in connection with employment;
  - c. necessary to protect your vital interests and you are physically or legally incapable of giving consent;
  - d. necessary for the establishment, exercise or defence of legal claims;
  - e. where it is necessary for reasons of substantial public interest or on the basis of applicable laws, such as to ensure compliance with (i) legislation relating to RADA's status as a Higher Education provider, or (ii) legislation concerning the safeguarding of children and of individuals at risk, or (iii) legislation requiring us to make reasonable adjustments for protected characteristics, or (iv) equal opportunity monitoring or treatment; or
  - f. where you have already made the information public.
- 3.2.4. Depending on the circumstances we collect the following special categories of data:
- a. if you are a job applicant, we will collect information about (i) your race, ethnicity, religious or philosophical beliefs and sexual orientation for the purpose of our diversity and equal opportunities records (on the basis that it is needed for reasons of substantial public interest, for equal opportunities monitoring); (ii) your health and any disability you may have as necessary for the purpose of arranging your interview (on the basis of compliance with our legal obligations to make reasonable adjustments in relation to protected characteristics), (iii) your criminal record for the purposes of completing background checks necessary for you to be able to work with children to whom we provide some of our courses (on the basis such processing is necessary for reasons of substantial public interest under applicable laws);
  - b. if you are offered a place on one of RADA's courses, you will be asked to declare details of any relevant unspent criminal convictions, in order for RADA to assess any risk to which staff and other students may be exposed

(on the basis such processing is necessary for reasons of substantial public interest under applicable laws);

- c. if you are a student or an examiner or an attendee at a workshop, we will collect information related to your health such as allergies to particular forms of medication, or conditions such as asthma or diabetes and dietary requirements (on the basis of your explicit consent). There will be very limited reasons why we might use such information without your explicit consent, for example in a medical emergency to inform medical professionals;
- d. If you are a participant in an event organised by the A&P departments, we will collect information on your gender, ethnicity, post code, economic background, educational background, and any disabilities you may have, in order to target our work and monitor its effectiveness;
- e. if you are a supporter at any level, we may collect data to improve your experience and note your preferences which could include dietary and health information which you provide to us orally or by email or post (on the basis of your explicit consent). There will be very limited reasons why we might use such information without your explicit consent, for example in a medical emergency to inform medical professionals; or
- f. if you are a student or prospective student, we will collect information about your medical history or requirements if a reasonable adjustment is needed in order to ensure we are able to offer you a fair and equitable assessment (either on the basis of your explicit consent or in compliance with our legal obligation to make reasonable adjustments for your circumstances).

#### 3.2.5. **Children's information**

We do not intentionally collect children's information (anyone under 13 years old) without explicit consent from the parent or guardian. If you believe a person under 13 years old has provided us with their personal information or have any concerns regarding this aspect of our notice, please contact [privacy@rada.ac.uk](mailto:privacy@rada.ac.uk)

## 4. **How we use information about you and recipients of your information**

4.1. We will use your information for the purposes listed below either on the basis of:

- 4.1.1. the performance of your contract with us and the provision of our services to you
- 4.1.2. Your consent (where we request it)
- 4.1.3. Where we need to comply with a legal or regulatory obligation
- 4.1.4. Our legitimate interests (see paragraph 4.3 below)

4.2. We may use your information for the following purposes:

- 4.2.1. **To provide access to our website:** to provide you with access to our website in a manner convenient and optimal and with personalised content relevant to you including sharing your information with our website hosts and developers (on the basis of our legitimate interest to ensure our website is presented in an effective and optimal manner);
- 4.2.2. **To monitor your attendance if you are a student:** if you are a student we also monitor your attendance through the data supplied by our timetabling software provider and/or your security card to ensure your attendance is in line with the course requirements (on the basis of our legal obligation under UKVI's requirements for international student visas, or on the basis of our legitimate interests in safeguarding your wellbeing and monitoring your progression as a student on one of our courses);
- 4.2.3. **To register your user account to allow you to purchase products or services:** when you sign up to use our website to purchase our products or services, we will use the details provided on your account registration form (on the basis of performing our contract with you);
- 4.2.4. **To register your Applicant and Student Gateway account:** if you are a registering student or prospective student we will use the details provided on your application or registration form (on the basis of performing our contract with you if you are a registering student, and on the basis of our legitimate interests in making available our courses to prospective students if you are a prospective student);
- 4.2.5. **To register your personnel account:** if you are a member of staff we will use the details provided on your application or registration form to create an account on BreatheHR (on the basis of performing our contract with you);
- 4.2.6. **To process and facilitate transactions with us:** we will use your information to process transactions and payments, and to collect and recover money owed to us (on the basis of performing our contract with you and on the basis of our legitimate interest to recover debts due);
- 4.2.7. **To track the effectiveness of our outreach activity in adherence with our Access and Participation Plan:** we will use your information collected if you take part in an outreach workshop as part of our A&P activity. This may take place at RADA or at a partner organisation's venue or your school. We collect this information on the basis of our legitimate interest to monitor and evaluate the effectiveness of our outreach activities. This information will be collected for research purposes and stored in the Higher Education Access Tracker (HEAT) database and stored in accordance with HEAT's Privacy Notice available at <https://heat.ac.uk/privacy-notice/>;
- 4.2.8. **Relationship management:** to manage our relationship with you, which will include notifying you about changes to our terms of use or Privacy Notice, and asking you to leave a review or take a survey (on the basis of performing our contract with you, to comply with our legal obligations and on the basis of our legitimate interests to keep our records updated and study how our website and services are used);
- 4.2.9. **User and customer support:** to provide customer service and support (on the basis of our contract with you), deal with enquiries or complaints about the website and share your information with our website developer, IT support

provider, payment services provider as necessary to provide customer support (on the basis of our legitimate interest in providing the correct products and services to our customers and to comply with our legal obligations);

- 4.2.10. **Fundraising:** to identify individuals and organisations whose beliefs and values are aligned with the core work of our organisation for philanthropic support and for memberships (on the basis of our legitimate interests as a registered charity to seek support and promote fundraising);
- 4.2.11. **Prize draws, surveys and competitions:** to enable you to take part in prize draws, surveys and competitions (on the basis of performing our contract with you and our legitimate interest in studying how our website and services are used, to develop them and grow our business);
- 4.2.12. **Recruitment:** to process any job applications you submit to us including sharing this with our third party recruitment agency (on the basis of our legitimate interest to recruit new employees or contractors);
- 4.2.13. **Marketing:** to keep in contact with you about our news, events, new website features products or services and fundraising opportunities that we believe may interest you, provided that we have the requisite permission to do so (either on the basis of your consent where we have requested it, or our legitimate interests to provide you with marketing communications where we may lawfully do so). We will note your marketing preferences so that we only contact you with information you have told us you would like to hear about and you may update these preferences at any time;
- 4.2.14. **Advertising:** to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you (on the basis of our legitimate interests in studying how our website/services are used, to develop them, to grow our business and to inform our marketing strategy);
- 4.2.15. **Publicity:** to promote our services which may include photographs or films in which you may appear. We may use such photographs or films in our printed and online publicity, social media and press releases (on the basis of our legitimate interests in promoting our services);
- 4.2.16. **Analytics:** to use data analytics to improve our website, products/services, marketing, customer relationships and experiences (on the basis of our legitimate interests in defining types of customers for our website and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy);
- 4.2.17. **Suggestions and recommendations:** to share your information with selected third parties such as suppliers and partners, to enable them to contact you with information about things that may interest you (where we have your consent to do so);
- 4.2.18. **Research:** to carry out aggregated and anonymised research about general engagement with our website (on the basis of our legitimate interest in providing the right kinds of products and services to our website users); and
- 4.2.19. **Compliance with policies, procedures and laws:** to enable us to comply with our policies and procedures and enforce our legal rights, or to protect the rights,



property or safety of our employees and share your information with our technical and legal advisors (on the basis of our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so)

- 4.3. Where we refer to using your information on the basis of our “legitimate interests”, we mean our legitimate business interests in conducting and managing our business and our relationship with you, including the legitimate interest we have in:
- 4.3.1 personalising, enhancing, modifying or otherwise improving the services and/or communications that we provide to you;
  - 4.3.2 promoting our services and studying how our website/services are used, to develop them, to grow our business and to inform our marketing strategy;
  - 4.3.3 safeguarding your wellbeing and monitoring your progression as a student on one of our courses detecting and preventing fraud and operating a safe and lawful business;
  - 4.3.4 maintaining our reputation and standing as a Higher Education Provider; and
  - 4.3.5 improving security and optimisation of our network, sites and services.
- 4.4 Where we use your information for our legitimate interests, we make sure that we take into account any potential impact that such use may have on you. Our legitimate interests don’t automatically override yours and we won’t use your information if we believe your interests should override ours unless we have other grounds to do so (such as your consent or a legal obligation). If you have any concerns about our processing please refer to details of “Your Rights” below.

We may record video conferences and webinars for the purposes of training of our staff and development of our services. Participants will be advised when recording is taking place and be given the option not to participate.

## 5. Who we might share your information with

5.1 in line with the lawful bases listed above, we may share your personal information where relevant with third parties such as:

5.1.1 **Partners and collaborators:** including King’s College, London (our validating university) based in the United Kingdom

5.1.2 **Our service providers:** service providers we work with to deliver our business, who are acting as processors and provide us with:

- a. Contracted creative, tuition and training services, based in the UK;
- b. website development and hosting services (Fabrique, based in the EU);
- c. IT, system administration and security services (Cara Networks Ltd, based in the UK);
- d. marketing and advertising services (including the Google Adwords service), analytics providers (including Google Analytics) based in the USA;
- e. maps services (including Google Maps API) based in the USA

- f. social media plugin services including Facebook, Twitter, Instagram, TikTok, Snapchat and YouTube based in the UK and USA;
- g. Video conferencing (including Microsoft Teams and Zoom) and booking scheduling software (OnceHub/ ScheduleOnce) based in the USA;
- h. payment services Spektrix and WorldPay (based in the UK); PayPal, based in the EU and Stripe, based in USA;
- i. legal, accountancy, auditing and insurance services and other professional advisers based in the UK;
- j. recruitment service providers based in the UK;
- k. travel service providers based in the UK;
- l. customer (including student) records management system, Microsoft Dynamics CRM, based in the UK;
- m. admissions system, Embark, based in the USA;
- n. Higher Education Access Tracker (HEAT) based at the University of Kent in the UK;

5.1.3 **Regulators and governmental bodies:** HM Revenue & Customs, regulators, governmental bodies and other authorities including, but not limited to the Office for Students (OfS), Jisc and it's subsidiary the Higher Education Statistics Agency, (HESA), OFQUAL, Department for Education (DfE), and UKVI, acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances;

5.1.4 **Donors and funders:** if you are a student receiving a privately funded scholarship or other financial support, we may share details of your activities at RADA with the donor or funder

5.1.5 **Marketing parties:** any selected third party that you consent to our sharing your information with for marketing purposes;

5.1.6 **Prospective sellers and buyers of our business:** any prospective seller or buyer of such business or assets, only in the event that we decide to sell or buy any business or assets; and

5.1.7 **Other third parties (including professional advisers):** any other third parties (including legal or other advisors, regulatory authorities, courts, law enforcement agencies and government agencies) based in the United Kingdom where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

5.2. With reference to 5.1.3 above, Jisc publish their own Collection Notices relating to staff, students and graduates at this address:

<https://www.hesa.ac.uk/about/regulation/data-protection/notices>;

- 5.3. We require third parties to maintain appropriate security to protect your information from unauthorised access or processing.
- 5.4. Sometimes we may ask for your permission to share details with others. For example, if you attend a training course we may ask if you are happy to share your contact details with other delegates.
- 5.5. We may release your information to third parties beyond those listed above only if we are required to do so by law (for example by court order) or in connection with prevention of fraud or other crime.

## 6. Cookies

- 6.1. We use cookies to ensure that you get the most out of our website. Cookies are small amounts of information in the form of text files which we store on the device you use to access our website. Cookies allow us to monitor your use of the software and simplify your use of the website.
- 6.2. If you do not wish for cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings please consult the “Help” section of your internet browser (or alternatively visit <http://www.aboutcookies.org>). Please note that, if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of the website.
- 6.3. We will include a list of our cookies in this notice and will update it from time to time.
- 6.4. Our website may contain content and links to other sites that are operated by third parties that may also operate cookies. We don't control these third party sites or cookies and this Privacy Notice does not apply to them. Please consult the terms and conditions and Privacy Notice of the relevant third party site to find out how that site collects and uses your information and to establish whether and for what purpose they use cookies.

## 7. How we look after your information and how long we keep it for

- 7.1. We use appropriate security measures to protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed, such as:
  - 7.1.1. ensuring the physical security of our spaces;
  - 7.1.2. ensuring the physical and digital security of our equipment and devices by using appropriate password protection and encryption;
  - 7.1.3. maintaining a data protection policy for, and delivering data protection training to, our employees; and
  - 7.1.4. limiting access to your personal information to those in our company who need to use it in the course of their work.
  - 7.1.5. In addition, we limit access to your personal data to those employees, agents, contractors and other third- parties who have a business need to know. They will only process your personal data on our instructions (which, in the case of our employees and contractors, are set out in our policies) and they are subject to a

duty of confidentiality. We regularly review and update our procedures to deal with any suspected personal data breaches. In the event of any suspected personal data breach we will notify the individuals affected and the applicable data regulators, where legally required to do so.

- 7.2 We will retain your information for as long as is necessary to provide you with the services that you have requested from us or for as long as we reasonably require to retain the information for our lawful business purposes, such as for the purposes of exercising our legal rights or where we are permitted to do. We operate a data retention policy and look to find ways to reduce the amount of information we hold about you and the length of time that we need to keep it. For example, we maintain a suppression list of email addresses of individuals who no longer wish to be contacted by us. So that we can comply with their wishes we must store this information permanently.
- 7.3. Full details of RADA's Data Retention Policy is available as an appendix. Please use the contact details at paragraph 2 for more information.

## **8. Help keep your information safe**

- 8.1. You can also play a part in keeping your information safe by:
- 8.1.1. choosing a strong account password and changing it regularly;
  - 8.1.2. using different passwords for different online accounts;
  - 8.1.3. keeping your passwords confidential and avoiding sharing your login with others;
  - 8.1.4. making sure you log out of the website each time you have finished using it. This is particularly important when using a shared computer;
  - 8.1.5. letting us know if you know or suspect that your account has been compromised, or if someone has accessed your account without your permission;
  - 8.1.6. keeping your devices protected by using the latest version of your operating system and maintaining any necessary anti-virus software; and
  - 8.1.7. being vigilant to any fraudulent emails that may appear to be from us. Any emails that we send will come from an email address ending in '@rada.ac.uk' or 'RADA@r1.arts.mail.com'. Emails relating to full-time course admissions will come from noreply@embark.com
  - 8.1.8. storing all private, sensitive and confidential documents in a secure environment such as a lockable cabinet or non-portable safe.

## **9. International transfers of your information**

- 9.1. Our Company is located in the UK.
- 9.2. Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside of the EEA. We will also transfer your personal data outside of the EEA in the following cases:

9.2.1. Transcripts from short courses may be sent back to the students' home university

9.3. Whenever we transfer your personal data outside of the EEA, we will take steps to ensure that adequate protection is provided for information transferred overseas as required under data protection laws.

## **10. Your rights to the information we hold about you**

10.1. You have certain rights in respect of the information that we hold about you including:

10.1.1. the right to be informed of the ways in which we use your information, as we seek to do in this Privacy Notice;

10.1.2. The right to ask us not to process your personal data for marketing purposes

10.1.3. The right to request access to the information that we hold about you;

10.1.4. The right to request that we correct or rectify any information that we hold about you which is out of date or incorrect

10.1.5. In certain circumstances, the right to ask us to stop processing information about you;

10.1.6. The right to lodge a complaint about us to the UK Information Commissioner's Office (<http://ico.org.uk/>), you will also be able to lodge a complaint with the relevant authority in your country of work or residence;

10.1.7. The right to withdraw your consent for our use of your information in reliance of your consent, which you can do by contacting us using any of the details at the top of this Privacy Notice;

10.1.8. The right to object to our using your information on the basis of our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground; and

10.1.9. The right to receive a copy of any information we hold about you (or request that we transfer this to another service provider) in a structured, commonly-used, machine readable format, in certain circumstances; and

10.1.10. The right to ask us to limit or cease processing or erase information we hold about you in certain circumstances.

### **How to exercise your rights**

10.2. You may exercise your rights above by contacting us using the details at the top of this Privacy Notice, or in the case of preventing processing for marketing activities also by checking certain boxes on forms that we use to collect your data to tell us that you don't want to be involved in marketing or by updating your marketing preferences via your account with us.

10.3. Please note that we may need to retain certain information for our own record-keeping and research purposes. We may also need to send you service-related

communications relating to your website user account even when you have requested not to receive marketing communications.

### **What we need from you to process your requests**

- 10.4. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- 10.5. You do not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **11. Changes to this privacy notice**

- 11.1. We may make changes to this Privacy Notice from time to time. We will post any changes to our site or notify you of any material changes by e-mail.
- 11.2. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by updating your profile account information or contacting us via the contact details at the top of this Privacy Notice.

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|-------------------------|--------------------|
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| Document Approved by    | SLT                |
| Date Approved           | 11 June 2024       |
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| Owner                   | Registrar          |