

# **GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS**

## **Introduction**

Associated Studios ("We") are committed to protecting and respecting your privacy.

This policy (together with our terms of use:

<https://associatedstudios.co.uk/wp-content/uploads/2019/04/TERMS-OF-SERVICE.pdf> and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

## **1. Definitions**

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – Natural person

### **Categories of data: Personal data and special categories of personal data**

**Personal data** - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## **2. Who are we?**

Joshua Yeardley is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: Associated Studios, The Hub, St Albans Fulham, Margravine Road, London, W6 8HJ. For all data matters contact our data representative Joshua Yeardley on [info@associatedstudios.co.uk](mailto:info@associatedstudios.co.uk).

## **3. The purpose(s) of processing your personal data**

We use your personal data for the following purposes:

- Keeping up-to-date student records
- Direct marketing

- Internal audits on demographics and recruitment processes.

#### 4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data – Names, Addresses, Date of Birth, Bank Sort Code and Account Number, Previous Training, Emergency Contact Details, Social Media Contact Details, Assessment Marks, Personalised Tutor Feedback.

We have obtained your personal data from the application form and further consent forms you have filled in once your studies with us have begun. Other data is generated through your work with us at Associated Studios.

#### 5. What is our legal basis for processing your personal data?

##### a) Personal data (article 6 of GDPR)

##### Our lawful basis for processing your general personal data:

<input type="checkbox"/> Consent of the data subject;	GDPR Consent is outlined in all of our student contracts, systems are also in place for people to easily withdraw that consent.
<input type="checkbox"/> Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	Student contract with Associated Studios to enter into a period of study. Student contract with University of Wolverhampton c/o Associated Studios to enter into a period of Higher Education study.
<input type="checkbox"/> Processing necessary for compliance with a legal obligation	Data will be processed by Associated Studios to secure legal obligations to protect and support students entering into study from abroad and students granted any form of educational loan.
<input type="checkbox"/> Processing necessary to protect the vital interests of a data subject or another person	Data will be processed to help protect students in times of medical emergency.
<input type="checkbox"/> Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	Processing required to give anonymised statistics to relevant bodies including Ofsted, QAA, OfS, DfE, Charity Commission, and University of Wolverhampton.
<input type="checkbox"/> Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	

##### b) Special categories of personal data (article 9 of GDPR)

##### Our lawful basis for processing your special categories of data:

<input type="checkbox"/> Explicit consent of the data subject	
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<input type="checkbox"/> Processing necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement	
<input type="checkbox"/> Processing necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent	
<input type="checkbox"/> Processing carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided that the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and there is no disclosure to a third party without consent	
<input type="checkbox"/> Processing relates to personal data manifestly made public by the data subject	
<input type="checkbox"/> Processing necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity	
<input type="checkbox"/> Processing necessary for reasons of substantial public interest on the basis of EU or Member State law	
<input type="checkbox"/> Processing necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional	
<input type="checkbox"/> Processing necessary for the reasons of public interest in the area of public health	
<input type="checkbox"/> Processing necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes	

More information on lawful processing can be found on the [ICO website](#).

## 6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with relevant staff at Associated Studios, relevant bodies at University of Wolverhampton (for students enrolled in MA studies), and relevant bodies responsible for Higher Education Funding (for students in receipt of financial loans or educational aid). Associated Studios never passes your data onto 3<sup>rd</sup> parties other than those stated.

## 7. How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary in order to help with future queries or complaints, contact you regarding requests from industry professionals, maintaining safeguarding and financial records.

## **8. Providing us with your personal data**

We require your personal data as it is a contractual requirement in order for us to offer the appropriate level of services to you, and for you to undertake studies with Associated Studios. Failure to offer your data and failure to give consent for us to process the data we have on you will result in refusal of services and termination of any offer to study with us at Associated Studios.

## **9. Your rights and your personal data**

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- THE RIGHT TO WITHDRAW YOUR CONSENT TO THE PROCESSING AT ANY TIME, WHERE CONSENT WAS YOUR LAWFUL BASIS FOR PROCESSING THE DATA;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

## **10. Transfer of Data Abroad**

We do not transfer any data outside of the EEA.

## **11. Automated Decision Making**

We do not use any form of automated decision making at Associated Studios

## **12. Further processing**

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## **13. Changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **14. How to make a complaint**

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Representative Joshua Yeardeley on [info@associatedstudios.co.uk](mailto:info@associatedstudios.co.uk).

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.