

**LAMDA**

# Privacy Notice

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**LONDON ACADEMY OF MUSIC AND DRAMATIC ART**

## LAMDA - PRIVACY NOTICE

### 1. INTRODUCTION

- 1.1 This privacy notice (**Privacy Notice**) sets out the ways in which we, LAMDA (**we, us, our**), collect and use your personal data (your personal information) in connection with our business. 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 (<https://www.lamda.ac.uk>), by telephone, by SMS, by email, in person at our one of our teaching or London public examination spaces or theatres (**Spaces**), or at a venue operated by a third party. It also applies to our interactions with you when working offsite such as during our outreach workshops and auditions.
- 1.3 We envisage that this Privacy Notice will apply to you if you are a user of our website, a customer using our online shop, a “friend” “member” or “patron” or general donor of LAMDA, a student or prospective student of LAMDA using the Applicant and Student Gateway service, a supplier, an applicant for a job vacancy, or a teacher or examiner using the ExamTrack service. This is a non-exhaustive list and may also include other users of our website, services and Spaces which are not specifically listed here.

### 2. ABOUT US

- 2.1 We are a company registered in England under company number 364456, with our registered address as set out below. We are registered on the UK Register of Learning Providers (UKPRN: 10003758).
- 2.2 You can contact us as follows:

**FAO:** The Principal and CEO  
**Address:** LAMDA, 155 Talgarth Road, London W14 9DA, UK  
**Email:** [GDPR@lamda.ac.uk](mailto:GDPR@lamda.ac.uk)

### 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:
- make an enquiry, provide feedback or make a complaint over the phone, by email or on
  - our website;
  - submit correspondence to us by post, email or via our website;
  - apply for one of our courses, set up an account on the Student and Applicant Gateway
  - and/or register as a student;
  - attend a class or other learning activity;
  - attend an interview or assessment as a prospective student for one of our courses;

- (h) apply for or take one of our exams;
- (i) are a teacher or examiner and you register personal and account details to apply for access to Examtrack;
- (j) inform us that you have attended an audition;
- (k) attend an outreach workshop we may run as part of our Pathways Programme or other outreach activity.
- (l) register and make a donation to become a supporter (whether as a “friend”, “member” or “patron” or general donor of our organisation);
- (m) update your personal information or account details;
- (n) subscribe to our newsletter and mailing lists;
- (o) purchase products or materials from our online shop;
- (p) fill in a form, conduct a search, post content on the website, respond to surveys, participate in promotions or use any other features of the website;
- (q) register for and/or attend our events or performances at one of our Spaces;
- (r) provide or offer to provide us with goods or services;
- (s) submit a CV or an application for a job vacancy;
- (t) attend an interview or assessment for a job vacancy; and
- (u) “follow”, “like”, post to or interact with our social media accounts, including Facebook, Youtube, Twitter, Snapchat, Instagram.

3.1.2 **The information you provide to us will include (depending on the circumstances):**

- (a) **Identity and contact data:** title, names, addresses, date of birth, gender, email addresses and phone numbers;
- (b) **Account profile data:** if you’re registering for an account on the Student and Applicant Gateway as a student or prospective student, or as a teacher or examiner registering for Examtrack you may also provide a username, password and other personal preferences;
- (c) **Financial data:** if you are using our website to purchase products or services, you will also provide payment details, which may include billing addresses, credit/debit card details and bank account details;
- (d) **Student admission data:** if you are a student or prospective student of LAMDA using the Applicant and Student Gateway you will be asked to provide in the application form in order for your suitability to be assessed. These details will include: full name, address and other contact details; your nationality and domicile; information on previous academic qualifications and a statement concerning relevant experience, a ‘headshot’ photograph and other data items needed for monitoring purposes, as per the provision under 3.1.3 and 3.1.4 below.
- (e) **Student fees and funding:** if you are a student or prospective student applying for a course or an examination you may also provide payment details, which may include billing addresses, credit/debit card details and bank account details and details of other financial information related to your funding such as eligibility for undergraduate grants, student loans, scholarships and bursaries;

- (f) **Academic background data:** if you are a student or prospective student applying for or registering for a course or an examination, you may also provide details of your academic records and results and unique learner number;
- (g) **Graduate records of auditions:** if you are a graduate and you attend an audition, you may also provide us with details about your audition so that we may handle casting enquiries efficiently in the future;
- (h) **Employment and background data:** if you are submitting a job application, you may also provide additional information about your academic and work history, projects and research that you are involved in, your previous income level, references and any other such similar information that you may provide to us; and
- (i) **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.

#### Information we collect about you:

- (j) **Information contained in correspondence:** we will collect any information contained in any correspondence between us. For example, if you contact us using a query button on our website or by email or telephone, we may keep a record of that correspondence;
- (k) **Information transmitted on the website:** we will collect information that you upload or post to your website account;
- (l) **Information collected in person:** we will collect any information you supply to us in person during the course of our services;
- (m) **Information collected during our Access and Widening Participation (AWP) workshops:** if you attend one of our workshops as part of our Pathways Programme or other outreach activity, we will keep a record of your attendance, and other relevant details in order to help identify you and track your progression if you subsequently apply to one of our Higher Education courses;
- (n) **Transactional data:** we will collect information related to your transactions, including the date and time, the amounts charged and other related transaction details;
- (o) **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.

- (p) **Audio or video recording:** we may retain an audio or video record of an exam, an audition or an interview you attend for internal moderation purposes only, to ensure consistency and accuracy of decision making.
- (q) **Imagery:** from time to time we may capture images of you when we take photographs or film the Spaces. We will endeavour to let you know by printed notices at the Spaces whenever such filming or photography will take place; and
- (r) **CCTV:** we collect information about you through CCTV footage which operates at our Spaces. We endeavour to give you notice of our use of CCTV by fixing signs at the entrances to our Spaces which inform you of our use of CCTV.

### Special categories of personal data

- 3.1.3 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.
- 3.1.4 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 LAMDA'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.
- 3.1.5 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 LAMDA's taught courses, you will be asked to declare details of any relevant unspent criminal convictions, in order for LAMDA 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 AWP department, we will collect information on your gender, ethnicity, post code, economic background, educational background and any disabilities you have, in order to target our work and monitor its effectiveness; or
- (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). We have an internal data protection policy which describes how we handle your personal information once you become an employee or a registered student of LAMDA.

## 3.2 Information we receive from third parties

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 receive information about you from third parties such as UCAS;
- (c) **Service providers:** we may collect personal information from our website developer (Numiko), IT support provider (Aura) and payment services providers (Spektrix and Realex) (who are based inside the EU);
- (d) **Website security:** we will collect information from our website security service partner, Aura, about any misuse to the website, for instance, the

introduction of viruses, Trojans, worms, logic bombs, website attacks or any other material or action that is malicious or harmful;

- (e) **Social media plugins:** we currently use social media plugins from the following service providers who are based both inside and outside the EU: Facebook, YouTube, Twitter, Snapchat, and Instagram. By providing your social media account details you are authorising that third-party provider to share with us certain information about you;
- (f) **Attendance data:** we collect information about your attendance via our timetabling software (Celcat) and through and by other electronic means such as swipecard records which provides information about your access to our Spaces including the frequency and location; and
- (g) **Medical information:** if you are a student or prospective student we may receive an assessment from your medical practitioner, educational psychologist, psychiatrist, counsellor or other medical professional in order to assess your fitness to train in respect of our Higher Education provision or to ascertain the type and level of reasonable adjustment required in respect of our work as an Awarding Body.

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.

#### 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 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; or
- 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 access 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 ExamTrack account:** if you are a teacher or examiner registering to use the ExamTrack account we will use the details provided on your application or registration form (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 Pathways Programme. This may take place at LAMDA or at one of our 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 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 **To manage casting enquiries:** we use records of your past auditions to manage subsequent casting enquiries we receive about you (on the basis of our legitimate interest to track the casting of our graduates and handle enquiries about our graduates efficiently);
- 4.2.9 **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);
- 4.2.10 **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);
- 4.2.11 **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);
- 4.2.12 **Prize draws, competitions and surveys:** to enable you to take part in prize draws, competitions and surveys (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);

- 4.2.13 **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);
  - 4.2.14 **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;
  - 4.2.15 **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);
  - 4.2.16 **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);
  - 4.2.17 **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);
  - 4.2.18 **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);
  - 4.2.19 **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
  - 4.2.20 **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.

## 5. WHO WE MIGHT SHARE YOUR INFORMATION WITH

- 5.1 In connection with the purposes and on the lawful grounds described above and in addition to the recipients of your information as described above, we will share your personal information when relevant with third parties such as:
- 5.1.1 **Partners and collaborators:** including the University of Kent (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) website development and hosting services provided by Numiko based in the UK;
    - (b) IT, system administration and security services Aura based in the UK;
    - (c) marketing and advertising services (including the Google Adwords service), analytics providers (including Google Analytics) based in the USA;
    - (d) timetabling software provider (Celcat) based in the UK;
    - (e) maps services (including Google Maps API), based in the USA;
    - (f) social media plugin services including Facebook, Twitter, Instagram, Snapchat and YouTube based in the UK and USA ;
    - (g) payment services Spektrix, based in the United Kingdom and Realex, based in Ireland;
    - (h) legal, accountancy, auditing and insurance services and other professional advisers based in the UK;
    - (i) recruitment service providers based in the UK;
    - (j) travel service provider, Key Travel, based in the UK; and
    - (k) student record system, Ellucian Ireland Ltd, based in Dublin, Ireland;
    - (l) Higher Education Access Tracker (HEAT), based at the University of Kent in the UK;
    - (m) Instructure Inc, who are based in the USA and 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 its subsidiary the Higher Education

Statistics Agency (HESA), OFQUAL, Qualification Wales, CCEA, UCAS, Learning Records Service, Department for Education, 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 **Marketing parties:** any selected third party that you consent to our sharing your information with for marketing purposes;
  - 5.1.5 **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
  - 5.1.6 **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 for students, graduates and staff 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.

## 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 operate a policy of “privacy by design” by looking for opportunities to minimise the amount of personal information we hold about you. We use appropriate technological and operational security measures to protect your information against any unauthorised access or unlawful use, 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.
- 7.2 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 LAMDA's records and data retention policy are 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 '@lamda.ac.uk' and [LAMDA@arts-mail.co.uk](mailto:LAMDA@arts-mail.co.uk); and
  - 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 the EEA. We will also transfer your personal data outside of the EEA in the following cases:

- 9.2.1 results and certificates from LAMDA examinations to students are sent back to the country of origin where the student's home university is based (if they are a visiting student); and
- 9.2.2 transcripts for short course or semester Higher Education students containing grade information are sent back to the student's home university.
- 9.3 Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following transfer solutions are implemented:
- (a) we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#);
  - (b) where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, [European Commission: Model contracts for the transfer of personal data to third countries](#); and
  - (c) where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).
- 9.4 Our suppliers who are outside of the EEA are located in the USA.
- 9.5 Please contact us using the contact details at the top of this Privacy Notice if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## 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 (<https://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. SHARING DATA DIRECTLY WITH THIRD PARTIES**

- 11.1 You might end up providing personal information directly to third parties as a consequence of your interactions with our website and other services offered by us. For example, you may attend an event hosted by us where you communicate personal information directly with other attendees. We are not responsible for how such third parties use personal data provided by you.
- 11.2 Please be responsible with personal information of others when using our website and the services available on it. We are not responsible for your misuse of personal information, or for the direct relationship between you and others when takes place outside of the website or our services.

**12. THIRD-PARTY LINKS**

- 12.1 The website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

**13. CHANGES TO THIS PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

- 13.1 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.
- 13.2 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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This Privacy Notice was updated on 30 January 2024.