



PRIVACY POLICY

1. Introduction

Welcome to our Privacy Policy.

Iconic Steps Film Academy C.I.C. (the "**Company**", "**us**", "**our**" or "**we**") is a community interest company (Company No. 08311368) incorporated in England and Wales. Our registered office is at 236 Emlyn Gardens, London, W12 9UN.

The Company is the data controller in relation to your personal data.

We respect your privacy and are committed to protecting your personal data. This Privacy Policy will inform you how and why we collect your personal data, how we look after your personal data, and about your privacy rights and how the law protects you.

This Privacy Policy explains how we collect and process your personal data when you:

1. become a student (or where you are a former student) of the Company;
2. are a customer or supplier of the Company.
3. visit our website;
4. sign up to receive updates and newsletters from us

It is important that you read this Privacy Policy together with any other privacy policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

1. **Contact data:** your name, title, address, telephone/mobile number, email address, name of organisation;
2. **Background information:** date of birth, ID numbers/documentation, marital status, family information, financial/economic background (including benefits history), education levels, employment history;
3. **Financial data:** bank account / payroll details (when a student starts working with us);
4. **Transaction data:** details and records about payments to and from you, including details of goods and services that you have provided to us, or that we have provided to you;
5. **Medical information:** disabilities, current illnesses/conditions, current medications (and dosages) being taken, and GP details (name, address and phone number). These details are only stored by us for as long as a student is enrolled on a course, after which they are deleted;
6. **Reporting data:** gender, ethnicity, sexual identity, religious beliefs; employment status of students, level of education and a simple "yes" or "no" confirmation of whether a student has any previous criminal convictions (we do not process any personal data relating to the criminal convictions or offences themselves which would identify the conviction or offence, or tell us anything about it (or any related charges, proceedings or ancillary information));
7. **Images and video:** photographs and video footage;

8. **Technical data:** internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website;
9. **Usage data:** information about how you use our website, products and services; and
10. **Marketing and communications data:** your preferences in receiving marketing from us and our third party partners, and your communication preferences.

We obtain this information directly from you. Where you are a prospective student, we may be given information about you from third parties (such as the youth offending service, schools, housing authorities and local authorities) when these organisations refer you to us. The Company may supplement the information that you provide to us, or which we are given, with information that we receive or obtain from other sources, such as from our professional advisors, partners, and agents of the Company, third parties with whom we interact, and publically available sources.

Children under the age of 16

We do not generally work with children under the age of 16. On the very rare occasions where we do, we may collect and process personal data about the relevant individual. This occurs, for example, where a school or housing association refers a child to us for enrolment on one of our courses, or for another type of assistance. We are permitted by data protection law to rely on the consent given directly by the child, so long as the child is not under the age of 13 (for which parental or guardian consent is required). We do not process the personal data of children under the age of 13.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. Purposes for which we use your personal data

We have set out below, in table format, a description of all the ways we plan to use your personal data and which legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need further details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing, including any legitimate interests pursued
<p>Students</p> <p>Personal data related to current and prospective students is collected and processed so that we can provide students with the courses and services they have enrolled for. This includes where students create work for, or provide creative services to, our customers.</p> <p>We may from time to time process images and video footage of students for promotional purposes.</p>	<p>(a) Contact (b) Background (c) Financial (d) Medical (e) Images and video</p>	<p>(a) Performance of our contract with you. (b) Explicit consent (medical data). (c) Consent (information, images and videos of students included in promotional materials). (d) Necessary for our legitimate interests (to stay in touch with our alumni).</p>

<p>We also process medical data about our students so that we can deal with any medical emergencies whilst a student is on our premises.</p> <p>We also process the personal data of alumni in order to communicate with them, update them of our activities, and work/collaborate with them in future.</p>		
<p>Reporting requirements</p> <p>We process the personal data of our students in order to prepare impact and statistical reports for our funders and sponsors. This is a condition of our funding, and it allows our funders to see if we are reaching the correct target audience.</p> <p>In some instances we may name a student in our reports, or include photos or quotes from them, or case studies about them. In these instances we obtain the consent of the relevant student prior to the inclusion of their information in any reports.</p>	<p>(a) Background (b) Reporting (c) Images and video</p>	<p>(a) Necessary for our legitimate interests (to receive funding from our funders and sponsors). (b) Consent (in order to include personal data (photos, quotes and case studies) about students in our reports).</p>
<p>Customers and suppliers</p> <p>We process the personal data of contacts at our customers and suppliers so that we can provide goods and services to our customers, and receive goods and services from our suppliers. This includes:</p> <p>(a) managing payments, fees and charges; and (b) collecting and recovering money owed to us.</p>	<p>(a) Contact (b) Financial (c) Transaction</p>	<p>(a) Performance of our contract with you. (b) Necessary for our legitimate interests (to recover debts due to us).</p>
<p>Relationship management</p> <p>To manage our relationship with you which may include:</p> <p>(a) communicating with you; (b) notifying you about changes to our terms or Privacy Policy; and (c) asking you to leave a review or take a survey.</p>	<p>(a) Contact (b) Marketing and Communications</p>	<p>(a) Performance of our contract with you. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).</p>
<p>Administration</p>	<p>(a) Contact (b) Background (c) Financial</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of</p>

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(d) Transaction (e) Technical (f) Usage	administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise); (b) Necessary to comply with a legal obligation.
Website and online advertising To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you. This includes using analytics to improve our website, products/services, marketing, customer relationships and experiences.	(a) Contact (b) Usage (c) Technical (d) Marketing and communication	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).

Marketing

We may use your contact, technical, usage and marketing and communication data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us, or purchased goods or services from us and you have not opted-out of receiving that marketing. Alternatively, you may receive marketing communications where you have specifically opted-in to receive these (for example, by signing up for updates or newsletters on our website).

You can ask us to stop sending you marketing at any time by clicking "unsubscribe" on any email marketing sent to you, or alternatively by contacting our Data Protection Manager on the details below.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy.

4. Disclosure and transfer of your personal data

The Company may disclose your personal data to the following categories of third parties:

1. where you are a student, we may disclose your name and telephone number to course tutors (with your consent) so that you can communicate with tutors during your course, and continue to receive teaching and mentoring from them after you have completed your course;
2. the Company's professional advisors (e.g. our accountants and legal advisors);
3. vendors who will process your personal data on our behalf and under our written instructions to carry out their services during the course of our business, such as IT service providers, financial institutions, customer relationship management vendors and other cloud-based solutions providers that are used but the Company in the conduct of its business. We contract with such vendors to ensure that they only process your personal data under our instructions and ensure the security and confidentiality of your personal data by implementing the appropriate technical and organisational measures for such processing;
4. third parties to whom the Company is required to transfer personal data by law, such as HMRC, law enforcement bodies, governmental and regulatory bodies, the courts and other competent

authorities that may request personal data in connection with any inquiry, court order, or other legal or regulatory procedures which we would need to comply with; we may also share personal data to establish or protect the Company's legal rights, property or safety, or the rights, property or safety of others, or to defend against legal claims; and

5. any third party connected with business transfers; we may transfer your personal data to third parties, in connection with a reorganisation, restructuring, merger, acquisition, or transfer of assets, provided that the receiving party agrees to treat your personal data in a manner consistent with data protection law.

We may transfer your personal data to controllers or processors located outside of the European Economic Area (EEA). This is primarily to allow us to receive IT services (e.g. cloud storage services, email/webmail services and customer relationship management services) from vendors located in non-EEA jurisdictions, such as the US. However, we will only transfer your personal data to a vendor in a non-EEA country where:

1. where such countries provide for an adequate level of personal data protection, or where the data recipient is certified under the EU/US Privacy Shield;
2. where we have in place a valid data transfer agreement with the data recipient (such as the European Commission standard contractual clauses); or
3. where we are otherwise permitted to make the transfer under data protection law.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

5. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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 and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. Data retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

When we no longer need to use your personal data, we will remove it from our systems and records, and or take steps to anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations we are subject to).

In some circumstances you can ask us to delete your data (please see "Your legal rights" below for further information).

7. Your legal rights

Under data protection law, you have certain rights in relation to your personal data:

1. **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
2. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
3. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Please note however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
4. **Object to processing** of your personal data where we are relying on a legitimate interest (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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
5. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (a) if you want us to establish the data's accuracy;
 - (b) where our use of the data is unlawful but you don't want us to erase it;
 - (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims;
 - (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
6. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
7. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

8. Third-party links

This 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 policy of every website you visit.

9. Contact us

We have appointed a Data Privacy Manager who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions in relation to this Privacy Policy, including any requests to exercise your legal rights, please contact the Data Privacy Manager using the details below.

Data Privacy Manager
Iconic Steps Film Academy
3Space International House

London
SW9 7QD

Email: info@iconicsteps.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would however appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

10. Keeping your information up to date

To help the Company keep accurate information, you must tell the Data Privacy Manager about changes to your information or personal details, in particular, any changes to your contact or financial details. If you know that the Company holds any personal details about you that are out of date or inaccurate, you must tell the Company as soon as possible.

11. Notification of changes

The Company may update this Privacy Policy from time to time as our privacy practices change, or as required by applicable legal or regulatory requirements. Where it is practicable, we will notify you of any significant changes. However, the last update date is given below and the Company encourages you to review this privacy notice periodically so you remain informed of how the Company uses your personal data.

Last updated: 16 April 2020