

Privacy Notice Alumni



Who are we?

In this Privacy Notice, the terms "we", "our", and "us" refer to Stageworks Productions Ltd, trading as the International College of Musical Theatre (ICMT), 68 Wallis Road, London, E9 5LH, United Kingdom. ICO Registration number 08210001396.

As a controller of your personal data, we are responsible for looking after it, and we will use it fairly, lawfully, and in a transparent manner.

Purpose

We are committed to protecting your privacy. This notice will help you understand how we look after, use, store and share your personal data and how we meet our obligations under the General Data Protection Regulation 2016 and the Data Protection Act 2018 (Data Protection Laws). It supplements any other notices or statements we may provide to you.

What personal data do we collect?

Personal data is any information from which you can be identified, e.g. name, date of birth, contact details, identification numbers, photographs, and expressions of opinion about you.

The personal data we collect and how we process it can vary depending on your interactions with us. We have grouped it as follows:

- Identity data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, ICMT ID number.
- Contact data includes address (home, postal or other physical address), email address and telephone numbers.

- Equality of opportunity or treatment data (including racial origin, religious beliefs, health, and sexual orientation).
- Academic information including academic department and programme of study, years of study and graduation dates, classification of degree.
- Images (including photographs and videos).
- Career data.
- Financial data, including credit card details or other financial information.
- Event data.
- UK tax status.
- Case study data (i.e. data relation to alumni experience).

Special category data

We may process your special category data, such as:

- Racial or ethnic origin.
- Religion.
- Political views.
- Trade union membership.
- Genetics and biometrics (where used for ID purposes).
- Health and disabilities.
- Sex life and sexual orientation.

We will only process this data where you have given your explicit consent for us to do so; where you have manifestly made the personal data public, or when that processing is legally required.

Where do we get your personal data from?

We collect your personal data directly from you; during your visits to our website, if you attend our events, or through any other communication you have with us.

Except for your IP address data, when visiting our website, we will only collect personal data when it is voluntarily submitted.

We also obtain some personal data from other third parties (please see below for further details).

Information that you give us

You may share personal data about yourself and your circumstances by:

- Enquiring about our activities.
- Registering for an event or volunteering.
- Making a donation.
- Engaging with our social media channels.
- Confirming your contact details when we contact you to find out information about our graduate outcomes
- Giving us information about yourself in any communications with us either by telephone, e-mail, or post.

We need you to provide personal data in the situations listed above so we can support you or give you information that you need, and so we can comply with our legal obligations.

If you do not provide this data, it may mean that we will be unable to perform the services that we usually provide and therefore, we may have to cancel a service you have requested, but we will notify you if this is the case at the time.

Information that we collect about you

We collect the following information about you:

- Details of your visits to our website including, but are not limited to, Internet Protocol (IP) address used to connect your computer to the internet; MAC addresses; traffic data,

location data; your login information; time-zone setting, browser type and version; browser plug-in types and versions; operating system and platform; weblogs; cookies and other communication data; and the resources that you access.

- Data including your name and images captured on CCTV when you visit our campuses.
- As part of the events organised at our campuses and their associated buildings, as necessary for our legitimate interests, third-party photographers may be on site. If you do not wish to be included in any photographs or live-streamed events (such as graduation ceremonies which are recorded and available online), please ensure that you clearly express your wishes to a staff member.

Information that we receive from other sources

We may receive personal data about you from other third parties. For example, address and detail verification check providers (where it is considered acceptable by the Information Commissioner's Office to obtain information from such providers).

Please note that we may combine personal data we receive from other sources with personal data you give to us and personal data we collect about you.

Why do we need personal data, and how do we use it?

- To provide you with the information you have requested about our work and/or activities. This might include sending you e-newsletters, invitations to events and volunteering opportunities. We will use your name and the contact details that you provide to us.
- To monitor graduate outcomes and keep our alumni records up to date in accordance with our public interest functions.
- To offer you alumni and careers support, and promote further postgraduate study in accordance with our public interest functions and our legitimate interests.

- For administration purposes, e.g. we may contact you about a donation you have made or an event you have expressed an interest in or registered.
- To ask you for permission to use the story of your experience with the ICMT to promote our work.
- To create an account for you if you register with us.
- To process entries into a prize draw or raffle you have chosen to enter and to communicate with winners.
- For internal record keeping, including managing any feedback or complaints we may receive.
- To use IP addresses to identify your approximate location, block disruptive use, record website traffic or personalise how our information is presented to you, keep our website updated and relevant to you, and for network security.
- To analyse and improve the services offered on our sites and make them as user friendly as possible, to keep our websites updated and relevant to you, to develop our work and inform our marketing strategy.
- To use anonymised personal data to benchmark our activity with other relevant organisations.
- To transfer to HM Revenue and Customs in respect of any Gift Aid claims for statutory and regulatory compliance.
- To assess your personal data for credit risk reduction or fraud prevention.
- To keep your records as up-to-date as possible. To help us do this, we may use publicly available sources, for example, the Post Office's National Change of Address database. Please see the 'Keeping your information up-to-date' section below for more details on how you can let us know if your contact details change.

- To market and promote the ICMT, its courses and events to alumni.
- To engage with alumni to encourage business partnerships and recruitment activities with the ICMT.
- To facilitate the process of legacy gifts and claiming gift aid on donations.
- To ensure equality of opportunity to all students in terms of access and participation.
- To safeguard students and staff by providing safe and secure environments and meeting health, wellbeing and duty of care requirements in line with Health and Safety legislation throughout their studies and/or employment.
- To facilitate individuals' protection and wellbeing and enforce the general regulations concerning criminal activities and participation.
- When you visit a staff member or, in some instances, when you attend an event on campus, we will process your data such as name and vehicle registration number. Where applicable, we may also process disability information to make reasonable adjustments for accessible parking.
- We will keep records of attendance (and that of your guests) on visits across our campus, including visitor logs, details of any payments made, photographs and video recordings in which you may be included (CCTV), to operate security.
- If you report a data breach, we will set up an electronic case file containing the details of the breach and keep a record of our correspondence with you. We need information from you to contain and mitigate the risk. This enables us to comply with our legal obligations under the legislation we are subject to.
- If you submit a Freedom of Information Request or a Data Subject Access Request, we will keep a record of that correspondence to deal with and/or respond to your request. We need information from you to respond to you and to locate the information you are looking for. This enables us to comply with our legal obligations under the legislation we

are subject to. When we receive a request from you, we will set up an electronic case file containing the details of your request. This normally includes your contact details and any other information you have given us. We will also store, on this case file, a copy of the information that falls within the scope of your request in order to maintain adequate records of information we have made public and/or released to you.

Legal claims

Personal data, including special category data, may be processed to establish, exercise or defend a legal claim.

Basis for using your personal data

We need a legal basis for any processing of personal data. This means that our processing must be for one of a limited number of reasons set out in the data protection laws. We mainly process your personal data as described in this Notice because it is necessary for our legitimate interests to deliver our alumni services. Some processing of your personal data may be carried out to perform a contract with you or because it is required by law, such as completing the Graduate Outcomes Survey.

Further details of the legal bases that we rely on are:

Processing is necessary to enter into or perform a contract

When we process alumni donations, payments for alumni events or claim gift aid donations, we are performing a contract with you. For us to deal with any enquiry or request made by you prior to entering into a contract and to fulfil our obligations under it, we will need to collect, process and share (as further detailed below) your personal data. Please note that we may not be able to provide the services under it if you: do not provide us with the personal data required, object to the type of processing we need to do, or exercise your right to have your personal data deleted.

Compliance with a legal obligation

Sometimes we process your personal data because we are legally obliged to do so, for example: in some of the circumstances listed above; in relation to the prevention of crime, or because we

may be required to share your data with certain statutory bodies.

Legitimate interests

We may use your personal data (excluding special category data) as set out in this Privacy Notice for the legitimate interests of the ICMT, including:

- Raising the profile of the ICMT by giving the best possible opportunities to its graduates.
- Maintaining relevant and up-to-date records.
- Offering career support and promoting further postgraduate study.
- Protecting our reputation and goodwill.
- Ensuring equality of access and participation, and outcomes.
- Utilising photographs and videos for marketing and promotional purposes.
- Claiming Gift Aid on donations.

We will always balance our legitimate interests in processing your personal data against your privacy rights.

Legitimate interest	We have a legitimate interest in processing your personal data as: <ul style="list-style-type: none">• You benefit from the provision of the services we provide.• We both benefit from the ability to enforce or apply rights under any contract between us.• This enables us to assist you following your graduation.• A strong relationship with our graduates is mutually beneficial.
Necessity	<ul style="list-style-type: none">• The processing is necessary for the purposes outlined in this Privacy Notice.
Impact of processing	<ul style="list-style-type: none">• Such processing does not unreasonably intrude on your privacy.

Vital interests

We consider it reasonable to process personal data for the protection of any interests that are essential for someone's life.

Consent

Generally, we do not rely on consent as a legal basis for processing your personal data other than for sending third-party direct digital marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

Where we wish to use your image in promotional videos and photographs, we will first obtain your consent.

If we require your consent to process your personal data in any other circumstances, we will contact you separately to request this.

Processing of your personal data

Processing means doing anything with the personal data, such as collecting, recording, organising, structuring, storing, adapting or altering, retrieving, accessing, consulting, disclosing, disseminating, aligning or combining, restricting, erasing or destroying or using the data in any way.

We will process your personal data for the purposes set out above or as we otherwise notify you.

The personal data you provide will be subject to security measures and procedures to minimise the risk of unauthorised access, loss, theft or disclosure.

Your personal data will not be used for automated decision-making.

How long do we keep your personal data?

We will only keep your personal data for as long as we need to fulfil the purposes for collecting it, including satisfying any legal, accounting, or reporting requirements.

We consider a number of factors in deciding how long to keep your data: the amount, its nature and sensitivity, the potential risk of harm from unauthorised use or disclosure; the purposes for processing it, and whether we can achieve those purposes through other means; and the applicable legal requirements.

Who do we share your personal data with?

Your personal data is stored on our database, which is password protected, and access is limited to the ICMT staff dealing with the Graduate Outcomes survey. Your personal data will not be disclosed to any other individuals or entities except in the following circumstances:

- Occasionally, we need to use trusted subcontracted parties such as IT support services in connection with our database.
- We may pass your personal data to our third-party service providers, agents, subcontractors and other associated organisations to complete tasks and provide services to you on our behalf (for example, to send out mailings). When we use third-party service providers, we only disclose personal data necessary to deliver that service and are subject to a contract to ensure your personal data is kept secure. We will not share or sell your data to third parties for their purposes unless we are required to do so by law, for example, by a court order or for the prevention of fraud or other crime. Third parties process data that we share with them, where such processing is to be conducted under a formal agreement that includes provisions around the processing of personal data and provides appropriate safeguards. Some of our suppliers may use aggregated (e.g. statistical or demographic data derived from personal data, but is not considered as such in law as it does not reveal your identity) and anonymised data for their purposes, including for benchmarking and service improvement.
- We may pass your personal data to photographers to support the services we provide to you and, if required, in connection with such services to the general public.
- Where it is necessary for the performance of our contract with you, including where you have asked us to do so or where we need to take steps to enforce any contract that may be entered into between us.
- Where we are under a legal duty to do so in order to comply with any legal obligation.
- In order to protect the rights, property or safety of our business, our staff, customers, suppliers and others. This includes exchanging information with other companies and organisations for the purposes of fraud prevention and credit risk reduction.

- We may also pass your personal data on to third-party employers or other legitimate reference seekers.
- Regarding our legitimate interest in claiming Gift Aid on donations, we may pass your personal data on to banks, other financial institutions and HMRC.
- We will pass your personal data to HESA (Higher Education Statistics Agency) to conduct the Graduate Outcomes survey 15 months after completion of the course.
- If you are participating in an event, we may share personal data with external organisations providing services for the event you are attending. In particular, we may share your information (including dietary requirements) with a catering service if you attend an event where catering is offered. The personal data shared will only be used to provide the service required and will not be retained by these external organisations after the event is concluded.

Keeping your personal data secure

We are committed to the protection and security of your personal data. We will ensure that appropriate measures are taken against its unlawful or unauthorised processing and against its accidental loss or damage.

Your data protection rights

You have the right to:

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.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data that we hold about you corrected. However, we may need to verify the accuracy of the new personal data.

Request the erasure of your personal data. This enables you to ask us to delete or remove personal data if:

- There is no good reason for us to continue processing it.

- You have successfully exercised your right to object to processing (see below).
- You believe we may have processed your personal data unlawfully.
- We are required to erase your personal data to comply with the law.

Please note that we may not be able to comply with your request for specific legal reasons, which, if applicable, will be notified to you.

Object to processing of your personal data when we are relying on a public task or a legitimate interest (or those of a third party), and you feel that this processing impacts your fundamental rights and freedoms. However, these may be overridden by the public interest or our legitimate interest grounds.

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:

- If you want us to establish the accuracy of the data.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it (for example, if you need it to establish, exercise or defend legal claims).
- If you have objected to our use of your data, but we need to verify whether we have overriding public interest or legitimate interest grounds to use it.

Request the transfer of your personal data to you or a third party. We will provide your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated data that you initially provided consent for us to use or where we used the data to perform a contract with you.

Withdraw consent at any time when we are relying on consent to process your personal data. This will not affect the lawfulness of any processing before you withdraw your consent. You can ask us to stop sending you marketing messages at any time by following the "unsubscribe" (or similar) links on any marketing message sent to you or by contacting us at any time. When you opt-out of receiving these marketing messages, you will no longer hear from us in that regard.

Exercising your rights

If you wish to exercise any of your above rights, please send a written request to the International College of Musical Theatre, 68 Wallis Road, London, E9 5LH, or email info@theicmt.com.

You will not have to pay a fee to exercise your rights. However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to confirm your identity. This is a security measure to ensure that personal data is not disclosed to anyone with no right to receive it. We may also contact you to ask you for further information to speed up our response.

We try to respond to all legitimate requests within one month. However, it may take us longer if your request is particularly complex or if you have made several requests. In this case, we will notify you and keep you updated.

Complaints and questions

We have appointed a Data Protection Officer to oversee compliance with this Privacy Notice. If you have any concerns or complaints about it, please contact the Data Protection Officer at the International College of Musical Theatre, 68 Wallis Road, London, E9 5LH, or email info@theicmt.com.

If you are not satisfied with the proposed resolution of your complaint, you have the right to contact the Information Commissioner's Office. Further information can be found on the Information Commissioner's website at www.ico.org.uk or via their helpline on 0303 123 1113.

We reserve the right to update this Privacy Notice at any time. Any updated versions will be made available on our website.