

Privacy Notice

Prospective Students and Applicants



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.

Where applicable, we will collect the following:

- Identification and contact data (including name, identification number, date of birth, photograph, physical address, electronic contact details and telephone number).

- Equality of opportunity or treatment data (including racial origin, religious beliefs, health, gender and sexual orientation).
- Images (including photographs and videos).
- Education data (including relating to your current education situation).
- Employment data (where an employer is funding your study).
- Interaction data (where you use our application portal to apply for a course).
- Special category data (including your racial or ethnic origin, disability, and medical conditions).
- Criminal record data (including criminal conviction disclosure statements and DBS checks).

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 except that.

- a) Information about your ethnicity and racial or ethnic origin, your religious or philosophical beliefs, health and disabilities and your sexual orientation may be processed in order to monitor compliance with the following:

- The ICMT's legal obligations.
- The requirements of the Higher Education Statistics Agency (HESA) and the Office for Students.
- Other equal opportunities legislation.

b) Information about your physical or mental health and any disabilities that you may have may be shared with the relevant staff of the ICMT in order to provide you with the best possible support for your studies and assessments.

Criminal convictions

Personal data relating to criminal convictions and offences may have been collected from you in the following instances:

- If we are being made aware of it by a third party, such as the police or other crime and fraud prevention and detection agencies,
- If we are notified of such information directly by you during your studies with us.

We will only process data relating to criminal convictions or alleged criminal behaviour when permitted to do so by the Data Protection Laws and only in accordance with our Disclosure of Criminal Convictions Policy. The processing of criminal conviction data occurs:

- When the ICMT must comply with the law.
- Where there is a substantial public interest in us doing so (including to ensure that we can provide a safe and secure learning environment in accordance with our safeguarding responsibilities and public interest functions).
- In legal claims, where it is necessary to protect your or someone else's interests, and you cannot give your consent, or where you have already made the information public.

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.

<p>Information that you give us</p>	<p>You may share personal data about yourself and your circumstances by:</p> <ul style="list-style-type: none"> • Providing information as part of your application process with the ICMT. • Providing us with information as part of any surveys and feedback requests we issue at open days and other engagement events. • Filling in forms on our website, registering and continuing to use our website. • Giving us information about yourself in any communications with us either by telephone, email, post or otherwise. <p>We need you to provide the personal data in the situations listed above so we can support you or give you the information that you need and so that we can comply with our contractual obligations to you, our legal obligations and our public interest tasks.</p> <p>If you do not provide this data, it may mean that we will be unable to offer you a place on one of our courses, continue with your education at the ICMT, or provide you with the level of support and assistance that we usually provide.</p>
<p>Information that we collect about you</p>	<ul style="list-style-type: none"> • 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 one of 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,

	please ensure that you clearly express your wishes to a staff member.
Information that we receive from other sources	<p>We may receive personal data about you from other third parties, including:</p> <ul style="list-style-type: none"> • Third-party recruiters engaged on our behalf. • The Police and Criminal Records Agency. • Sponsors and bodies and agencies who are funding your higher education. • Other members of the ICMT. • External health and social care professionals, including doctors, consultants, nurses, psychiatrists, social workers and paramedics, if there is serious concern about your welfare, where such information is reasonably necessary to help safeguard your wellbeing. • Other staff or students of the ICMT as part of our Case Reporting System. • Your parents, guardians or any other third parties who send us personal data on your behalf.

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

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

- To assess your application to study with us.
- To respond to your queries or requests.
- To enable us to meet our legal obligations.
- To make important information available to you relating to your application, query or request and, where applicable, to check that you are receiving and engaging with the information made available to you in connection with our public interest function and/or our legitimate interests.

- For relevant professional conduct purposes, in accordance with our legal obligations and as may be necessary for our public interest functions and/or our legitimate interests.
- To report to third parties in relation to any application, you may make to the ICMT where a third party has been involved in the application process and as may be necessary for connection with our public interest functions and/or our legitimate interests.
- To report to an employer, sponsor or other agency (if they are paying for your study) information, they require to assess compliance with the terms of your study or to comply with our contractual or legal obligations.
- To arrange open days and other engagement activities as may be necessary for connection with our public interest functions and/or our legitimate interests.
- To send you details of the courses we offer and any alterations or amendments in relation to them, where you have previously expressed an interest in the same or similar courses or as may be necessary for connection with our public interest functions and/or our legitimate interests.
- To take up any references you may provide us where necessary in connection with our public interest functions and/or our legitimate interests.
- To assess whether you are suitable for any grant or other financial support we may offer, as may be necessary for connection with our public interest functions and/or our legitimate interests.
- To assess your application as a prospective student with respect to your suitability and to comply with general regulations for access and participation requirements.
- As part of our efforts to keep our campuses and sites safe and secure (for example, through CCTV on our sites).
- For marketing and promotion of Coventry University, its courses and degree programmes.

- 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, to provide you with a parking permit. Where applicable, we may also process disability information to make reasonable adjustments for accessible parking.
- If you submit a Data Subject Access Request or a Freedom of Information Request, we will keep a record of that correspondence to deal with and/or respond to your request. We need information from you 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 the information we have released to you.
- To provide information about the ICMT, the course of interest to you and any events you have enrolled on or agreed to attend.
- To ensure equality of opportunity in terms of access and participation and equality of treatment in access to information and events.

Legal claims

Personal data, including special category data, may be processed for establishing, exercising or defending 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. The legal bases that we rely on are:

Processing is necessary to enter into or perform a contract

When you apply to become a student with us, you are taking steps to enter into a contract with

us. In order to be able to process your application, we will need to collect, process and share (as further detailed below) your personal data. Please note that we may not be able to enter into a contract with you or 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, to demonstrate compliance with Home Office regulations, or because we may be required to share your personal data with specific statutory bodies.

The processing is necessary for the performance of a task carried out in the public interest

We may need to process your personal data to carry out our public interest tasks, such as providing higher education. For example:

- Recruiting new students to the ICMT and encouraging student applications.
- Ensuring applicants and prospective students meet our course requirements and are suitable applicants.
- Ensuring the quality of the services which we provide.
- Protecting our reputation and goodwill.
- Ensuring the smooth and efficient operation of the ICMT and our recruitment and engagement activities.
- Providing the highest possible quality higher education for our students.
- Ensuring we meet our obligations of facilitating equal access, participation and outcomes.

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:

- Taking photographs at events and engagement activities, we operate for marketing and promotion.

- Reviewing CCTV footage to ensure we fulfil our legitimate interests in providing a safe and secure environment.
- Appropriately targeting our engagement activities.

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

Legitimate interest	<p>We have a legitimate interest in processing your personal data as:</p> <ul style="list-style-type: none"> • We both benefit from the ability to enforce or apply rights under any contract between us. • We need to ensure health and safety at our sites. We have a legitimate interest in ensuring that any related policies and processes are effective. • We need to ensure our site's security and assist with crime prevention and detection. • We need to ensure engagement and a safe and supportive learning environment.
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 sending you third-party direct digital marketing communications. You can 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 may be disclosed to other departments within the ICMT so that they can carry out their day-to-day activities (in relation to the provision of education and ancillary services), as well as to third parties (including information about your post-university work or study situation), including to:

- The police and other crime and fraud prevention and detection agencies for crime prevention or detection purposes.
- The Home Office, including UK Visas and Immigration, UK embassies, local authorities and other government bodies, to comply with our obligations to the Visa and Immigration Service and any successor to it.
- Government bodies and agencies, where we are legally obliged to do so, according to a valid request, such as (by way of examples only) the Higher Education Statistics Agency, the Office for Students (OfS), the Higher Education Funding Council for England and the Quality Assurance Agency for Higher Education.
- The Disclosure and Barring Service where such information is required in order to comply with a legal obligation.
- Sponsors, agencies or bodies funding or intending to fund your programme of study in accordance with our contractual or legal obligations or where it is necessary for our public interest functions and/or our legitimate interests to do so.
- Your country's government, high commission, embassy or consulate where we are legally required to do so or where our public interest functions and/or our legitimate interests must do so.
- External health and social care professionals, including doctors, consultants, nurses, psychiatrists, social workers and paramedics, if there is serious concern about your welfare and where such information is reasonably necessary to help safeguard your wellbeing.
- Third parties are engaged in organising engagement events and activities so that they can make any necessary reasonable adjustments to ensure equality of access or to ensure dietary requirements are considered. The personal data shared will only be used to provide the service required and will not be retained by these third parties after the event is concluded.

We may engage third parties to provide processing activities where it is necessary for our public interest functions and/or our legitimate interests to do so (including processing for administrative and practical purposes such as open days). We require that all third parties who process personal

data on our behalf treat it in accordance with the Data Protection Laws. We do not allow our third-party service providers to use your personal data for their purposes but only to process it for specified purposes and in accordance with our instructions. Such processing is to be conducted under a formal agreement, which 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.

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 correct any incomplete or inaccurate data that we hold about you. 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 you initially provided consent for us to use or where we used the data to 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 longer if your request is particularly complex or 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.