



## Participant Privacy Notice

### 1. About this document

This privacy notice explains how NFTS Scotland, a hub of the National Film and Television School ("we", "our", "us", "the School") collects, uses and shares your personal data, and your rights in relation to the personal data we hold. This privacy notice concerns our processing of personal data of past, present and prospective participants in training and events provided by the School ("you", "your").

NFTS is the data controller of your personal data and is subject to relevant Data Protection legislation<sup>1</sup>.

### 2. What is 'personal data'?

'Personal data' means any information which relates to or identifies you as an individual.

### 3. How do we collect your personal information?

We may collect your personal data in a number of ways, for example:

- (a) from the information you provide to us when you interact with us before joining, for example when you express your interest in undertaking training at the School;
- (b) when you apply for a course provided by the School and complete application forms and when you complete other admissions processes and procedures;
- (c) when you communicate with us by telephone, email or via our website, for example in order to make enquiries or raise concerns;
- (d) in various other ways as you interact with us during your time as a participant of training or of an event provided by the School, for the various purposes set out below;
- (e) from third parties, for example from your previous or current university or employers who may provide a reference about you or who may sponsor your studies.

#### **4. What types of information do we collect?**

We may collect the following types of personal data about you:

- (a) your name, and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality. For certain courses, we may allocate you a unique student number.
- (b) (where relevant for longer term courses) information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study and examination results. We will also keep records relating to assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record;
- (c) information about your family or personal circumstances, and both academic and extracurricular interests, for example where this is relevant to the assessment of your suitability to receive a bursary or in order to provide you with appropriate pastoral care;
- (d) sensitive personal data and information about criminal convictions and offences, including:
  - (i) information concerning your health and medical conditions (e.g. any disabilities you may have);
  - (ii) certain criminal convictions; and
  - (iii) information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation.

#### **5. How do we use information about our participants?**

The purposes for which we may use personal data (including sensitive personal data that you have chosen to give us) during a participant's association with us include:

- (a) recruitment and admissions;
- (b) academic matters, including:
  - (i) the provision of our core teaching and learning services (e.g. registration, assessment, attendance, managing progress, course evaluation, diversity monitoring, certification,);
  - (ii) maintaining participant records;
  - (iii) assessing your eligibility for bursaries and scholarships, etc.

- (c) nonacademic matters in support of our core services, including events, masterclasses and workshop tasters
- (d) monitoring equal opportunities;
- (e) reporting to the Scottish Government, who provide our bursary fund, about bursary applications made and contributions granted
- (f) safeguarding and promoting the welfare of participants;
- (g) ensuring participants' safety and security;
- (h) managing the use of social media;
- (i) managing car parking and access to internet at our training sites;
- (j) administering finance (e.g. fees, scholarships and bursaries);
- (k) other administrative purposes, including:
  - i. carrying out research and statistical analysis;
  - ii. carrying out audits (e.g. to ensure compliance with our regulatory and legal obligations);
  - iii. providing operational information (e.g. providing IT support, information about building closures or access restrictions on site, or safety advice);
  - iv. promoting our services (e.g. providing information about placements, or events happening on and off site)
- (l) preventing and detecting crime;
- (m) dealing with grievances and disciplinary actions;
- (n) dealing with complaints and enquiries.

## **6. What is the purpose and legal basis for processing your information and how do we use it?**

We may process your personal data because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract. In this respect, we use your personal data for the following:

- (a) to interact with you before you are registering as a participant in training, as part of the admissions process (e.g. to send you a course outline or answer enquiries about our courses);
- (b) once you have registered, to provide you with the services as set out in our Terms and Conditions;
- (c) to deal with any concerns or feedback you may have;
- (d) for any other purpose for which you provide us with your personal data.

We may also process your personal data because it is necessary for the performance of our tasks carried out in the public interest (as set out in our constitutional documents, which are available here:

<https://nfts.co.uk/sites/default/files/u102/Documents/Governance/Articles%20of%20Association%202013.pdf> )

or because it is necessary for our or a third party's legitimate interests. In this respect, we may use your personal data for the following:

- (a) to provide you with educational services which may not be set out in our Terms and Conditions but which are nevertheless a part of our academic and educational mission;
- (b) to monitor and evaluate the performance and effectiveness of the School, including by training our staff or monitoring their performance;
- (c) to maintain and improve the academic, corporate, financial, estate and human resource management of the School;
- (d) to promote equality and diversity throughout the School;
- (e) to seek advice on our rights and obligations, such as where we require our own legal advice;
- (f) recovering money you owe to us;

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

- (a) to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements;
- (b) for the prevention and detection of crime;
- (c) in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal data where:

- (a) it is necessary to protect your or another person's vital interests; or
- (b) we have your specific or, where necessary, explicit consent to do so.

## **7. Who will my information be shared with?**

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. You are given the opportunity to opt out of some of these data sharing

arrangements, for example when you register with us, but you should carefully consider the possible impact of doing this. Unless an opt-out is in place, we may disclose limited relevant personal data to a variety of recipients including:

- (a) our employees, agents and contractors where there is a legitimate reason for their receiving the information, including:
- (b) third parties who are contracted to provide IT and payroll services for us;
- (c) internal and external auditors.
- (d) those with an interest in tracking student progress and attendance, including:
- (e) current or potential employers (to provide references and, where participants are sponsored by their employer, to provide details of progress/attendance);
- (f) crime prevention or detection agencies (e.g. the police, the Department for Work and Pensions and Trading Standards);
- (g) parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure);

## **8. Will my information be shared outside of the EU?**

Some of the personal data we process about you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), for example where it is processed by staff operating outside the EEA who work for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA or who uses storage facilities outside the EEA.

In these circumstances, your personal data will only be transferred on one of the following bases:

- (a) where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission);
- (b) a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- (c) there exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

## **9. Fundraising and Alumni Relations**

We pass certain details of your personal data to our Alumni and Events teams for students graduating from certificate and diploma courses. This information will be used for alumni activities, including sending School communications, promotion of alumni services such as job opportunities, events and programmes. Your personal data may also be used in fundraising programmes. We may also disclose limited personal data to our contractors for analysis in connection with fundraising activities.

For more information about how your personal data is used by the Alumni and Events teams, please see the fundraising and alumni relations privacy statement, available at: <https://nfts.co.uk/privacy-policy>

If you do not want your personal data to be used for any of these purposes, please email: [scotland@nfts.co.uk](mailto:scotland@nfts.co.uk)

We may want to contact you after your course participation to discuss the impact of the course on your career development, and promote any successes which may be attributable to undertaking training with us.

## **10. How can I make changes to my personal data?**

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details. You can do this by emailing: [scotland@nfts.co.uk](mailto:scotland@nfts.co.uk)

## **11. How long is my information kept?**

Subject to any other notices that we may provide to you, we may retain your personal data for a period of 12 months after your association with us has come to an end. However, some information may be retained indefinitely by us in order to maintain your participant record for archiving purposes (or by the Alumni and Events team for the purposes of supporting your lifelong relationship with NFTS).

## **12. What are my rights under Data Protection legislation?**

You have the following rights:

- (a) to obtain access to, and copies of, the personal data that we hold about you;
- (b) to require that we cease processing your personal data if the processing is causing you damage or distress;
- (c) to require us not to send you marketing communications.

- (d) to require us to correct the personal data we hold about you if it is incorrect;
- (e) to require us to erase your personal data;
- (f) to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- (g) to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- (h) to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact our Data Protection Officer using the contact details set out below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

You can see more information about how your personal information is used or wish to exercise any of your rights, please consult the NFTS Data Protection Policy at: <https://nfts.co.uk/school/governance>

## **Who can I contact?**

If you have any queries about this privacy notice or how we process your personal data, you can contact our Data Protection Officer:

- by email: [dataprotection@nfts.co.uk](mailto:dataprotection@nfts.co.uk) or
- by post: Data Protection Officer, NFTS, Beaconsfield Studios, Station Road, Beaconsfield, Bucks HP9 1LG

To request access to the personal data that we hold about you, you may contact our Data Protection Office:

- by email: [dataprotection@nfts.co.uk](mailto:dataprotection@nfts.co.uk) or

- by post: Data Protection Officer, NFTS, Beaconsfield Studios, Station Road, Beaconsfield, Bucks HP9 1LG

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner.

You can find out more about your rights under data protection legislation from the Information Commissioner's Office website available at: [www.ico.org.uk](http://www.ico.org.uk).

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<sup>i</sup> This comprises the UK General Data Protection Regulation and the Data Protection Act 2018