

# Access Creative College (Access to Music Limited) General Privacy Policy

Last updated: 21/7/20

## Introduction

Access Creative College (Access to Music Limited, “We”, “Our”, “Us”), is committed to protecting the privacy and security of your personal data. We take care to protect the privacy of our learners, our employees, our website visitors, and anyone else that may communicate with us at any given time.

We have created this privacy policy to inform you about what personal data we collect, what we do with your personal data, how we ensure it is kept secure, and the rights and choices you have over your personal data.

Throughout this policy we will reference Data Protection Legislation, this means the Data Protection Act 2018 (DPA '18), the General Data Protection Regulation (GDPR), and the Privacy and Electronic Communications Regulations (PECR). This includes any replacement legislation that may come into effect.

Access Creative College is the controller for the personal information we process, unless stated otherwise. We are registered with the Information Commissioner’s Office (ICO). Our registration number is: Z7480437.

Our correspondence address is as follows:

Access Creative College (Access to Music Limited),  
50 Fountain Street  
Manchester  
M2 2AS

Our Data Protection Officer:

The DPO Centre Ltd.,  
50 Liverpool Street,  
London,  
EC2M 7PY.

Phone: 0203 797 1289

Website: [www.dpocentre.com](http://www.dpocentre.com)

## Information We Collect

### WEBSITE VISITORS

When you visit our website, we collect and store information relating to your use of the website. This information includes, but not limited to, activity data, location data, weblogs and other communication data. We also collect and store information about your device, including where available your IP address, operating system, and browser type.

Our lawful basis for processing these forms of your personal data is consent. We will actively seek your consent before collecting any of the information listed above.

## ENQUIRIES AND EVENT BOOKINGS

When you complete one of our website forms, we collect and store certain pieces of personal data and other information relating to you. What we collect will be linked to the nature of your enquiry and purpose for engaging with us i.e. whether you are submitting a general enquiry or a request for an event booking. We will collect the following information:

- Your name
- Your physical address
- Your email address
- Your phone number
- Course information (if relevant)
- Event information (if relevant)
- Other location information (if relevant)

The information we request from you will be used by Access Creative College only in order to contact you about your interest in the college, be that a course enquiry or event booking. Our lawful basis for this processing activity is legitimate interests. It is our interest to answer to use your information in order to answer any queries you may have, whomever you may be.

For information collected in respect of course or event enquiries we may use your data in extra marketing collateral, such as emails. We will always give you the choice to opt-in to receive such marketing materials. Our lawful basis for such marketing activity is consent.

## COURSE APPLICATIONS

When you complete a further education course application, we will collect the following information:

- Full name
- Date of birth
- Gender
- Nationality
- Residency
- Address
- Phone number
- Email address
- Parent/guardian/carer contact details
- Previous learning support information
- Disability disclosure
- Place of previous education
- Achieved/pending qualification
- Information relevant to your course application (e.g. skills and interests)

Our lawful basis for the processing of your information when applying for a further education course is contract: the processing is necessary for steps taken prior to entering into a contract with us to provide you with education and training.

## EMPLOYMENT APPLICATIONS

Job vacancies for Access Creative College are available on our website <https://www.accesscreative.ac.uk/jobs/>. When you apply for a role you are taken to our vacancy portal which is hosted by a third party company called Hireful. You can view their website and privacy policy here <https://hireful.co.uk/privacy-policy/>. When you apply for a role we collect and store certain pieces of Personal Data and other information relating to you, including:

- Full name
- Contact details, including email address, address, telephone numbers including mobile numbers,
- Work history, education, training, skills, experience, position held, dates of employment and any other information included in your CV including names of current and previous employers
- Details of job preferences
- Names and contact details of referees where provided
- Special category personal data linked to equality and diversity monitoring. This information is not available to hiring managers as part of their review and assessment of applications and is limited to representatives of People Services and Hireful for the purposes of statistical analysis or final inclusion in personal records of appointed candidates as part of their employment with the company.
- Answers to questions that we pose to ascertain your suitability for the job for which you are applying

Our lawful basis for the processing of your information when submitting an application for employment is contract: the processing is necessary for our employment contract with you, or it is necessary for steps taken prior to entering into a contract of employment.

## How We Use Your Information

### WEBSITE VISITORS

We use the information collected from you when you visit our website to:

- Improve the functionality of the website
- To help us improve the website
- To help us understand behaviour and make improvements to website processes

### ENQUIRIES AND EVENT BOOKINGS

We will use the information that you have provided to us when submitting an enquiry or requesting an event booking to:

- To contact you regarding your interest in the college i.e. responding to your enquiry or event booking
- To communicate with you on matters relating to your enquiry, or event booking
- To send you promotional emails about new events or other information that we think may be of interest

### COURSE APPLICATIONS

We will use the information that you have provided to us when submitting an application to one of our courses to:

- Effectively plan your potential learning journey with us
- Progress your application for study
- Contact you in relation to your application for activities such as arranging an interview, or to request more information

At other stages of the learner recruitment process where you submit a formal application form and/or enrol with the College we will collect further information from you as necessary for the processing of these stages in the learner journey.

Details of the information collected, the lawful basis for processing and how it is used will be made available to you at that time.

#### EMPLOYMENT APPLICATIONS

We will use the information that you have provided to us when submitting an application for employment to:

- Assess your potential employment with us
- Progress your application for employment
- Contact you in relation to your application for activities such as arranging an interview, or to request more information

## Third Parties and Onward Transfers

#### WEBSITE VISITORS

All visitors have the opportunity to use the chat function on our website. This can be used to raise general queries. We use software provided by PureChat who are based in the USA for the purposes of providing you with an opportunity to submit such an enquiry while browsing our site.

Their privacy policy can be found here: <https://purechat.com/privacy>.

#### ENQUIRIES AND EVENT BOOKINGS

For learner enquiry purposes we capture personal data via web forms embedded in our website. Any personal data collected will be used for the purposes outlined in this document.

#### PHYSICAL EVENTS

For the collection of data during external marketing events and taster days we use Software provided by SignUpAnywhere for the purposes of collecting and processing data for use in respect of direct marketing of information relating to our courses, centres and other relevant events.

Their Privacy Policy can be found here: <https://www.signupanywhere.com/privacy>.

#### EMPLOYMENT APPLICATIONS

For employment purposes we use the services of Hireful to collect and process personal data using their Applicant Tracking System (ATS). Access Creative College may receive your application via the ATS, directly via your application for a position on our website, or via embedded links in advertisements for vacancies placed with a variety of job boards either on our behalf by Hireful or directly by us. For more information you can refer to their privacy policy: <https://hireful.co.uk/privacy-policy/>

#### ONWARD TRANSFERS

The information that we collect from you may be transferred to, and stored at, various destinations. Whilst this will not normally include destinations outside the European Economic Area (EEA) for systems under our control, it may be processed by staff operating at various

locations outside the EEA who work for one of our IT service providers including hosting, connectivity or telecommunications.

An example of this would be services which utilise global business solutions e.g. Google G Suite, who can perform activities such as data back up and, disaster recovery. This means that our data systems using these platforms can pass through or be stored outside the EU. However, we ensure our service providers have established robust measures and procedures to ensure data integrity and compliance with the regulations. To view information relating to Google's GDPR compliance provisions please visit <https://cloud.google.com/security/gdpr/resource-center/>.

## How Long We Keep Your Information For

### WEBSITE VISITORS

We use analytics technologies provided by Google Analytics and other third parties. This involves cookies being set via our Website, which then collect information about your usage of our Website. Further information can be found in our Cookie Policy.

### ENQUIRIES AND EVENT BOOKINGS

For Course Enquiries or Event Bookings we will store your information for no more than one year after your initial enquiry/booking. Should you wish to remain in contact with us for the purposes of receiving further marketing or event information beyond this time you will be asked to provide additional consents to do so.

### COURSE APPLICATIONS

We will store your personal data for no more than one year after your initial application, unless you become a learner of Access Creative College. Personal data linked to your studies, funding, assessment and achievement will be retained in line with our statutory and contractual requirements as outlined in our data retention schedule.

Should you wish to remain in contact with us for the purposes of receiving further marketing or event information beyond this time, then you will be asked to provide additional consents to do so.

### EMPLOYMENT APPLICATIONS

For applications for employment we will store your Personal Data for a period of 6 months if you are not successful after which this will be deleted. The details for successful applicants will be transferred to your employment records with the business and retained in line with our data retention policies and statutory obligations, the details of which can be found here: [Privacy Notice - Workforce Data](#).

## Your Rights Over Your Information

### 1. The Right to be Informed:

You have the right to be informed about the collection and use of your personal data. We ensure we do this with our internal data protection policies and through our external website policy. These are regularly reviewed and updated to ensure these are accurate and reflect our data processing activities.

### 2. Right to Access:

You have the right to access the personal information that we hold about you in many circumstances, by making a request. This is sometimes termed ‘Subject Access Request’. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 30 days from when your identity has been confirmed.

We would ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

If you would like to exercise this right, please contact us as set out below.

### 3. Right to Rectification:

If any of the personal information we hold about you is inaccurate, incomplete or out of date, you may ask us to correct it.

If you would like to exercise this right, please contact us as set out below.

### 4. Right to Stop or Limit Our Processing of Your Data:

You have the right to object to us processing your personal information for particular purposes, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.

If you would like to exercise this right, please contact us as set out below.

### 5. Right to Erasure:

You have the right to have personal data erased. This is also known as the ‘right to be forgotten’. The right is not absolute and only applies in certain circumstances.

If you would like to exercise this right, please contact us as set out below.

### 6. Right to Portability:

The right to portability gives you the right to receive personal data you have provided to a controller in a structured, commonly used and machine readable format. It also gives them you the right to request that a controller transmits this data directly to another controller.

If you would like to exercise this right, please contact us as set out below.

The Information Commissioner’s Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers (including us) are available publicly. You can access their website here <https://ico.org.uk/for-the-public>.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have. You can contact us via our details below.

## Securing Your Information

The security of your information is important to us. We have implemented suitable physical, electronic, and procedural measures to safeguard your information. These include:

**Access control:** Access to all information will be controlled and will be driven by business requirements. Access will be granted or arrangements made for users according to their role and

the classification of information, only to a level that will allow them to carry out their duties. A formal user registration will be maintained for access to all information systems and services.

**Encryption of data:** The College will use encryption where appropriate to protect the confidentiality, authenticity and integrity of personal data, information and systems.

**Physical and environmental security:** The College will house information and data in secure environments, with a range of information technology and physical security protections in place.

**Communications security:** The College will maintain network security controls to ensure the protection of information within its networks, and provide the tools and guidance to ensure the secure transfer of information both within its networks and with external entities.

**We will never ask you for your passwords**

We have an Information Security Policy which is regularly reviewed and has been implemented across the College.

However, please keep in mind that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your information, we cannot guarantee its absolute security.

## Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). We recommend that you check this policy regularly to stay up to date.

## How to contact us

If you have any questions about this policy, please contact us.

By email: [dataprotection@accessmusic.ac.uk](mailto:dataprotection@accessmusic.ac.uk)

By phone: 0800 281 842

By post: using the address listed in the introduction

Learner related enquiries: [admissions@accessmusic.ac.uk](mailto:admissions@accessmusic.ac.uk)

Employment related enquiries: [people@accessmusic.ac.uk](mailto:people@accessmusic.ac.uk)