

# **LFA Communications Privacy Policy/Notice**

#### 1. Introduction

This Privacy Policy explains the basis on which London Film Academy ("LFA", "we", "our", "us") will collect and process personal information in the context of communications sent out by us to stakeholders (you/your").

### 2. Scope of Policy

This policy applies to stakeholders who engage with LFA via types of communication sent out by us, typically email. More specifically, this typically refers to: a) LFA newsletter b) Club Panico newsletter c) Information on LFA Annual Showcase d) information relating to LFA courses e) Any personal communication pertaining to any films created during your studies and related queries received by third parties (e.g. exhibition and distribution) Items a), b), c), and d) are available to anyone, including the general public; item e) is only available to current LFA students and recent graduates (up to two years after course completion). When not referred to individually, the items listed above will be referred to collectively as 'LFA communications'.

#### 3. Data we hold about you

The only personal data that we hold about you is personal data that you have provided to us.

If you would like us to communicate with you about any or all of the items listed in section 2 we will usually ask you to provide some basic information needed for us to include you in any communications. This information is normally collected via an online form available on our website or linked to in our communications. Information we collect includes:

- Your email address
- Confirmation of the types of communication you would like to receive.
- To better tailor some of our communications towards you and your interests, we may also ask you to provide some additional information. Providing this additional information is optional and if provided, it will be used together with the required information by the marketing automation platform ("platform") used by us to distribute communications.

### 4. Why we process your data

The main purpose of collecting data for LFA communications is for us to stay in touch with you for the following purposes:

- We would like to share information concerning achievements of students, staff and alumni.
- We also would like to update you on LFA's latest developments and events and to provide opportunities for alumni and others to support the school.
- We may use the information you provide to communicate with you for marketing, promotional, reporting and fundraising purposes.

### 5. People with whom we share your information

Access to your data is generally limited to LFA employees and only for the purposes outlined in section 4. LFA does not sell your data to third parties.

#### 6. Legal basis of processing

The legal grounds on which we process your personal data are as follows:

- Where the processing is necessary for us to perform a contract that you are party to, or to take steps at your request prior to entering a contract, that is the ground on which we are processing that data;
- Where the processing is necessary for compliance with a legal obligation to which we are subject, that is the ground on which we are processing that data;
- Where processing is necessary for the purposes of our legitimate interests, that is the ground on which we are processing that data, provided that your fundamental rights and freedoms which require protection of your data override those legitimate interests (our legitimate interests comprise furthering the aims and objectives of LFA);
- If you have given your consent to our processing the data, that is the basis on which we are processing that data.

If more than one of the above grounds apply to the processing of data in question, the applicable ground will be the one that is set out first above.





Where the basis on which we process data is that you have consented to the processing, you are entitled to withdraw that consent at any time.

### 7. Means of Collecting & Storing Data

#### 7.1. Data Collected by LFA

Data about anyone who signed up for an LFA communications as per section 2 of this policy is stored in the platform used by us to send out communications and within our internal LFA database. Access to this platform is secure and restricted to LFA staff. Both of these databases and systems used are provided and hosted by a third-party provider who will publish their own privacy policies. LFA is committed to reviewing privacy and data protection policies of providers of third-party systems on a regular basis.

### 7.2. Data Collected by Third Parties

We occasionally use a platform to send LFA communications to recipients. In addition to the information collected by us directly via the sign-up form, the platform itself collects additional information both directly and indirectly. This includes, but is not limited to: a) Contact language b) Location c) Favourite email client d) Preferred email format. Further, the platform also provides us with information about any emails sent to you, including whether it was opened or if any links were clicked.

### 8. How long we will keep your data

We will retain and continue to process any of the data you provide until you withdraw your consent either by clicking the link in any one of our communications or by emailing marketing@londonfilmacademy.com. We will delete records of anyone who has unsubscribed from all of our communications on a monthly basis unless you exercise your right to erasure (see section 11). Further details of LFA's wider data retention policies can be accessed via our LFA website.

#### 9. Methods of Communication

Our communications are normally by email and most communications are only sent out via email. If, however, you have provided your phone number (mobile or landline), we may also contact you by phone. If you have provided an address, we may also contact you by post. If you use public social media profiles and have provided the details, we may also contact you via social media. You can opt out of all communications via emailing marketing@londonfilmacademy.com

## 10. Updating Your Data

It is important to us that we always hold the most-up-date information about you. To update your data that we hold, please use the link included in each of our communications or email marketing@londonfilmacademy.com.

#### 11. Your Rights

You have various rights under Data Protection legislation. These include:

- The right to ask us not to process your personal data for direct marketing purposes, even if you have given consent;
- If our processing is based on your consent, the right to withdraw any consent you may have given for our processing of your data if you exercise this right, we will be required to stop such processing if consent is the sole lawful ground on which we are processing that data;
- The right to ask us for access to the data we hold about you;
- The right to ask us to rectify any data that we hold about you that is inaccurate or incomplete;
- The right to ask us to delete your data in certain circumstances;
- The right to ask us to restrict our processing of your data in certain circumstances;
- The right to object to our processing of your data in certain circumstances;
- In certain circumstances, the right to require us to give you the data we hold about you in a structured, commonly used and machine-readable format so that you can provide the data to another data controller.

You can exercise any of the rights set out above, free of charge, by using any applicable methods set out in our communications with you, or by contacting us by emailing marketing@londonfilmacademy.com. In respect of most of the rights referred to above, your right may be qualified by Data Protection legislation, for example where our processing of data is for the purposes of the establishment, exercise or defence of





legal claims. We may therefore not be able or required to fulfil your request, but we will discuss this with you following your request if necessary. Also, we may need more information from you, which we will ask You for following your request. We may ask you to provide further information in order to confirm your identity. Please also note that if you submit unfounded or excessive (for example repetitive) requests to exercise any of these rights, we reserve the right to make a reasonable charge for providing the requested information or taking the requested action, or to decline your request.

### 12. Complaints

You also have the right to lodge a complaint with the Information Commissioner's Office (www.ico.org.uk) if you are concerned that we are not respecting your rights under Data Protection legislation. The Information Commissioner's Office is the authority in the UK which is responsible for overseeing the application of, and enforcing, Data Protection legislation.

### 13. Changes to our Privacy Policies

Our privacy policies are reviewed regularly, usually on an annual basis. Updates will be posted on the LFA website. If we ever make significant changes to the way we process your personal data, we will either clearly highlight this on our website or write to you directly.

### 14. Version Update

Version Authored October 2018 by Vice Principal. Moderated by Joint Principal

#### 15. Controller's Contact Details

Any enquiries about this policy can be directed to:

Simon Flynn, Vice Principal London Film Academy 52a Walham Grove London SW6 1QR privacypolicy@londonfilmacademy.com +44 (0) 207 386 7711

