

## IMPERIAL COLLEGE DRAMATIC SOCIETY PRIVACY NOTICE

### What is the purpose of this document?

Imperial College of Science, Technology and Medicine (the “**College**” or “**Imperial**”) is committed to protecting the privacy and security of your personal information. Imperial College Dramatic Society (“**DramSoc**”), is a part of Imperial College Union (“**ICU**”, or the “**Union**”), and the College acts as the Data Controller for ICU and therefore DramSoc.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the applicable data protection legislation (the Data Protection Act 1998 until 24 May 2018 and the General Data Protection Regulations (the “**GDPR**”) from 25 May 2018 and the College’s Data Protection Policy.

The College is a "data controller". This means that the College is responsible for deciding how we (DramSoc) hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former students who are or were members of Imperial College Dramatic Society, as well as prospective and actual clients, including other parts of Imperial College Union, the College and external clients. It may also apply to people who interact with some parts of the Union, where DramSoc provides services to run events or productions, such as Musical Theatre Society productions, and major ICU events such as the Summer Ball and Freshers’ Week events, among others. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time. College and Union Data protection policies take precedence over this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

### Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## **The kind of information we hold about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, college CID number (if applicable), telephone numbers, and personal email addresses.
- Date of birth
- Gender
- Next of kin and emergency contact information
- Information regarding events, including pay (amount) details and location(s) of workplaces.
- Start date
- Employment or volunteer position records (including job titles, work history, working hours, training records and professional memberships)
- Compensation history – though this will mostly be held directly by ICU, rather than DramSoc, and so may be covered under the relevant ICU policies or privacy notices.
- Disciplinary and grievance information.
- Photographs.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, health and sickness records.

## **How is your personal information collected?**

We collect the personal information about you through automatic data feeds from College and Union systems, via our online forms, in person, via email, during productions, in the course of providing services to you, or after we have provided services to you, or when you purchase tickets or other products from us.

## **How we will use information about you and the legal basis for processing your data under the GDPR**

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you or in order to take steps at your request prior to the entry into a contract.
2. Where we need to comply with a legal obligation, or an obligation on DramSoc from the Union or the College.
3. Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.
4. Where it is necessary for our legitimate interests (or those of a third party) **and** your interests and fundamental rights do not override those interests.
5. Where it is necessary in order to protect your vital interests or someone else's vital interests.
6. Where you have consented to the processing.

### **Situations in which we will use your personal information**

We need all the categories of information in the list above (see 'The kind of information we hold about you') primarily to allow us to perform our contract with you or to provide services to you. In some cases, we may use your personal information to pursue legitimate interests of our own or those of ICU or the College, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- To provide you with the information and services that you request from us.
- To contact you in relation to your event, production and/or contract with us, including for the purposes of obtaining feedback.
- To ensure we meet any and all legal obligations with regards to the service we provide to you for the duration of your event, production or contract.
- In order to sell tickets via our box office, whether online or in person, or via some other method.
- To administer and fulfil requirements as agreed in the course of arranging your event/production and any related terms and conditions, including the DramSoc conditions of hire.
- To notify you about changes to our service.
- Paying you, for which details will be provided to the College payroll office. We do not hold banking or payroll records, however.
- Providing the following benefits to you: updates on our service and activities and providing service in a timely manner.

- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with DramSoc, ICU and College IT policies (such as the ICU Web and Web Conduct Policies and the College Conditions of use for IT facilities).
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- To ensure the information we hold about you is up to date and accurate.
- To ensure that content from our website is presented in the most effective manner for you and your computer or mobile device.
- To provide you with relevant news and special offers by email, phone or post where you have consented to receive this information.
- To remain in touch with our alumni via the Comus Club ([www.comus.org.uk](http://www.comus.org.uk)).
- Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

### **If you fail to provide personal information**

If you fail to provide certain information when requested, we may have difficulty in providing an appropriate service to you, contacting you when necessary, or in complying with relevant guidelines or legislation, such as health and safety law

### **Change of purpose**

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **How we use particularly sensitive personal information**

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where it is necessary in the context of employment law, or laws relating to social security and social protection.
3. Where the processing is necessary to protect your vital interests (or those of another person) where you are incapable of giving consent.
4. Where the processing is carried out in the course of our legitimate activities as a charity, with respect to our own members, former members, or persons with whom we have regular contact in connection with our purposes.
5. Where the processing relates to personal data which have been manifestly made public by you.
6. Where the processing is necessary for the establishment, exercise or defence of legal claims, or for courts acting in their judicial capacity.
7. Where the processing is necessary for reasons of substantial public interest and occurs on the basis of a law that is, inter alia, proportionate to the aim pursued and protects your rights as a data subject.
8. Where the processing is required for the purpose of medical treatment undertaken by health professionals, including assessing the working capacity of employees and the management of health or social care systems and services.
9. Where the processing is necessary for reasons of public interest in the area of public health (e.g. ensuring the safety of medicinal products).
10. Where the processing is necessary for archiving purposes in the public interest, for historical, scientific, research or statistical purposes, subject to appropriate safeguards.

## Our obligations

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to health to assist us in making a judgement about your ability to safely work with or for us and what adjustments (if any) may need to be made to accommodate you.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the course of your working with us, to assess your fitness to work, and to provide appropriate workplace adjustments.

## Do we need your consent?

We do not need your consent to process sensitive personal information if we use special categories of your personal information to fulfil or carry out your event/production and/or contract with us. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract (if applicable) with us that you agree to any request for consent from us.

With regards to mailing lists, which are operated by the College on our behalf (though we also have access to the data), your signing up to the mailing list is taken to be consent for us to hold your contact details on that list. You are free to leave such a list at any time; for Dramsoc lists, you can unsubscribe at [www.dramsoc.org/talk](http://www.dramsoc.org/talk), or for the Comus (alumni) email list, you should do so by contacting the Comus Honorary Secretary, on [honsec@comus.org.uk](mailto:honsec@comus.org.uk). If you cannot find the appropriate list, then contact [sysadmin@dramsoc.org](mailto:sysadmin@dramsoc.org) or [president@dramsoc.org](mailto:president@dramsoc.org) to have your address removed.

## Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

## **Data sharing**

We may have to share your data with third parties, including third-party service providers and other entities in the College group, and within ICU.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

## **Why might you share my personal information with third parties?**

We may share your personal information with third parties where required by law, where it is necessary to administer the relationship with you or where we have another legitimate interest in doing so.

## **Which third-party service providers process my personal information?**

The following third-party service providers process personal information about you for the following purposes: Amazon Web Services, Inc., which hosts some of the systems we use to hold and process some personal data, and Google, Inc., which also hosts some of our systems. Some data may also be held by Gandi SAS, who provide part of our email service alongside our web domains (e.g. dramsoc.org). Finally, in some cases some of our data may also be held by other parts of the College or the Union. In all of these cases, the data is used primarily for the administration of events, productions, our contract with you, or administration of your membership.

## **How secure is my information with third-party service providers and other entities in our group?**

All our third-party service providers and other entities in the College group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **What about other third parties?**

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business and operations of the College. We may also need to share your personal information with a regulator or to otherwise comply with the law.

## **Transferring information outside the EU**

We may transfer the personal information we collect about you to the following country outside the European Economic Area: United States of America, in order to perform our contract with you. There is an adequacy decision by the European Commission in respect of that country. This means that the country to which we transfer your data are deemed to provide an adequate level of protection for your personal information.

However, to ensure that your personal information does receive an adequate level of protection we have put in place the following appropriate measure[s] to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection: All accounts are marked as belonging to a UK entity, and so are covered by the Privacy Shield framework, which ensures that personal information transferred outside the EU to the US will be held and used in a way consistent with EU legislation.

### **Data security**

We have put in place measures to protect the security of your information.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Data retention**

#### **How long will you use my information for?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different records the College holds are available in our retention policy which is available on this website: <http://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/records-and-archives/public/RetentionSchedule.pdf>. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In the case of personal contact details for people who are not clients, we would expect to retain the data for as long as you are a College member, or as long as you remain associated with DramSoc or its alumni organisation. For clients, we would generally retain point-of-contact details permanently, unless we are advised (possibly by an automated College or Union system) that an individual no longer has a relationship with that client.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.



## **Rights of access, correction, erasure, and restriction**

### **Your duty to inform us of changes**

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the DramSoc Systems Administrator, or *in extremis*, the College's Data Protection Officer in writing.

### **No fee usually required**

You will not usually have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## **Right to withdraw consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the College's Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

## **Data Protection Officer**

In the first instance, if you have any questions, you should contact the DramSoc Systems Administrator on [sysadmin@dramsoc.org](mailto:sysadmin@dramsoc.org), or the person with whom you transact. However if you have a grievance, you should contact (in this order), [sysadmin@dramsoc.org](mailto:sysadmin@dramsoc.org), [president@dramsoc.org](mailto:president@dramsoc.org), [union.president@imperial.ac.uk](mailto:union.president@imperial.ac.uk) (in line with ICU disciplinary policies).

The College has appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice that DramSoc or ICU could not satisfactorily answer, please contact the Data Protection Officer at:

Data Protection Officer  
Faculty Building Level 4  
Imperial College London  
Exhibition Road  
London SW7 2AZ

e-mail: [dpo@imperial.ac.uk](mailto:dpo@imperial.ac.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the UK supervisory authority for data protection issues.

## **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.