

Glasgow School of Art Students' Association (GSASA) and Glasgow School of Art Students' Association Ltd. (GSASA Ltd.)

PRIVACY NOTICE – Trustees/Board Members, Employees, Sabbatical Officers, Members and Customers

Purpose of this Privacy Notice

GSASA AND GSASA Ltd is charity and multi-function arts venue. We act as a students' association for the Glasgow School of Art, as well as an independent business which supports the work of a variety of artists and art forms such as music, visual art and theatre.

In the course of our work GSASA and GSASA Ltd. processes personal data relating to our Trustees/Board Members; Elected Sabbatical Officers; customers and members. This data is collected for the purpose of managing our relationship(s) with you. We take our responsibility towards the handling of your data seriously, and wish to ensure that it is handled lawfully at all times and is compliant with the Data Protection Act (2018) and General Data Protection Regulation (GDPR). This Privacy Notice sets out the legal basis on which GSASA and GSASA Ltd process your personal data in accordance to Data Protection Legislation.

What is Personal Data?

Personal data means all information (paper based and digital) relating to you which could identify you directly and indirectly. This includes your name; your email address; your gender; your address; your marital status or title; your mobile number; your home telephone number; your educational status or qualifications; your current and previous employment details; and personal information which you filled out during any employment or application form or letter to us or which you provided during any interview process you had with us.

Sensitive Personal Data means any data which reveals your racial or ethnic identity; political opinions; religious or philosophical beliefs; trade union membership; your health; biometric or genetic information; or your sexual orientation or sexual life.

What is the Data Protection Legislation?

“**Data Protection Legislation**” means the Data Protection Act 1998 (to the extent it is in force); the General Data Protection Regulation (Regulation (EU) 2016/679); the Data Protection Act 2018; and any applicable legislation adopted by the United Kingdom.

Anyone processing data must ensure that data is:

- Processed fairly, lawfully and in a transparent manner;
- collected for specified, explicit and legitimate purposes and any further processing is completed for a compatible purpose;
- adequate, relevant and limited to what is necessary for the intended purposes;
- accurate, and where necessary, kept up to date;

- kept in a form which permits identification for no longer than necessary for the intended purposes;
- processed in line with the individual's rights and in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures;
- not transferred to people or organisations situated in countries without adequate protection and without firstly having advised the individual.

The purpose of the legislation is not intended to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of you as an individual.

GSASA and GSASA Ltd

Where we handle your personal data (including sensitive personal data), GSASA and GSASA Ltd acts as a 'data controller' for the purposes of Data Protection Legislation.

If you have questions regarding our Privacy Notice, you can contact our General Manager who acts as our Compliance Officer in matters pertaining to Data Protection. Their details can be found at the end of this Privacy Notice.

If you are unhappy with how we handle your personal information, you can:

1. Submit a complaint using our formal processes to complaints@theartschool.co.uk
2. Notify the Information Commissioners Office (ICO) by calling their helpline on: 0303 123 1113
3. Do both of the above

What personal data does GSASA and GSASA Ltd collect and how do we use it?

In order for us to function as a charity and as a business we collect and process a range of personal information about you. This information is provided to us by you depending on the relationship we have with you, and we only collect information if it is relevant to our relationship with you. Information we hold about you will vary depending on the relationship we have with you, but might include:

- Your name; address and contact details (including personal email address, mobile/home telephone numbers); your date of birth ;
- information about your "In Case Of Emergency" contact;
- your education information such as your course information, year group, matriculation number at Glasgow School of Art;
- your banking information where provided to us for funding purposes;
- banking information and information necessary for the processing of wages and fees (for example your Bank Details, National Insurance number and other employment status);
- equal opportunities monitoring information;

- details about your professional qualifications, previous employer, skills and work experience, information about your health or any disabilities you have (where relevant to your working relationship with us);
- information about your nationality;
- details of your working schedule;
- images provided to us through CCTV in our venue;
- information that you provide to us about complaints you have in the course of your time using the venue or Association.
- payment details and contact information if you have bought a ticket through the MusicGlue platform we use to process these sales.

Your personal data is stored in a variety of places, digitally and physically, within our venue and within the Association archive (based at The Glasgow School of Art).

Within our venue, we store your information in our email system; office computer and hard drive; cloud storage (Google Suite: please refer to this guidance on Google Suite and GDPR compliance https://gsuite.google.com/terms/dpa_terms.html); and secure hard copy filing system(s).

Within the GSA archives we store specific information of historic and artistic relevance to the activities of the Students' Association. These include some photographic and visual documentation of events and funded activities; SRC Committee meeting minutes; artworks and publications made by students which has been funded or made in connection the association.

Why do we process your personal data?

We process your personal data for the following reasons:

- Processing of payment for our events and activities (legal basis: legitimate interest);
- making a decision about an application process you have undertaken with us as part of an employment opportunity, funding opportunity, or residency or exhibition opportunity (legal basis: legitimate interest);
- communicating with you about the appointment or outcome of the above process (legal basis: legitimate interest);
- carrying out reference checks, where applicable (legal basis: legitimate interest);
- complying with health and safety obligations (legal basis: legal obligation);
- managing disabilities and reasonable adjustments you have including administering adjustments to work and/or the appointment process (legal basis: legal obligation);
- dealing with legal disputes involving you (legal basis: legal obligation);

- carrying out equalities and opportunities monitoring (legal basis: consent);
- carrying out CPD (legal basis: legitimate interest);
- processing of payment and fees for the purposes of employment or freelance work (legal basis: legal obligation);
- processing of payment obtained by you through funding opportunities (legal basis: legitimate interest);
- complying with our legal obligation that you are entitled to work in the UK (legal basis: legal obligation);
- monitoring our performance and attendance figures (legal basis: legitimate interest);
- complying with the conditions of our license and other regulatory requirements placed on us as a venue (legal basis: legal obligation);
- preventing and detecting criminal activity on our premises (legal basis: legal obligation, legitimate interest);
- for the purposes of the marketing of our events and activities both in the Association and in our venue.

GSASA and GSASA Ltd lawful basis for using your sensitive personal data

GSASA and GSASA Ltd., in accordance with the Data Protection Requirements, will only process personal data where it required for a lawful purpose. The lawful purposes include (amongst others):

- Consent has been given by you
- The processing is necessary for performing a contract (eg. an employment contract) and is authorized by UK or EU Law
- For compliance with our legal obligations (eg. the prevention of crime or the payment and deducting of tax)
- It is necessary for your vital interests (eg. we provide information about your medical history to a hospital in the event of a life threatening accident at work)
- It is necessary for the purposes of our, or our partners, legitimate interests
- It is necessary to establish, exercise or defend legal claims
- The use relates to personal data which is manifestly made public by you

How long will we hold onto your data?

GSASA and GSASA Ltd will not store your personal data longer than is necessary for the uses outlined above, unless it is required to do so to comply with the law and/or other regulatory requirements such as Licensing regulations for example.

Employment, Freelance worker and Recruitment Data

In the event you provide your personal data during the process of applying to GSASA or GSASA Ltd for the purposes of employment (speculatively or through an application process), we shall retain your information for a period of 6 months after we have communicated our decision to you. If you are unsuccessful we will securely destroy or anonymise your personal information.

If you are successful in an application to work for us, and are employed or taken on as a voluntary Board Member/Trustee, we shall retain your information for the duration of your time spent working with us. After your employment terminates, we will destroy records given by you to us for the purposes of your employment, as long as these documents are not necessary for our financial or legal requirements.

With your consent, we will retain your name and contact information for a stipulated amount of time.

If you would like us to retain your personal information on file in case similar opportunities arise in future, please email or write to us at work@theartschool.co.uk. We will continue to hold your personal information for this purpose for a maximum of 12 months after receipt of your written confirmation.

Data Provided through Funding Opportunities and Exhibition/Residency Opportunities

In the event that you are unsuccessful in applying for funding or other opportunities with us, we will retain your application for a period of 6 months after we have communicated our decision to you. If you are unsuccessful we will securely destroy or anonymise your personal information.

If you are successful in your application, we will retain a copy of your application details on file for the period of six years in order to comply with our regulatory requirements as a charity. After this period your application data will be securely destroyed.

Any banking details you provide to us for the purposes of payment during this process will be securely destroyed once payment has been made and will not be kept on file.

Transactions to you will be recorded for the purposes of our accounting and regulatory requirements as a charity.

Purchasing of tickets and/or pre booking of events

We collect email address, postal address and banking details, where there is a fee, for the purpose of processing ticket sales on Music Glue, our data processor. We have instructed our data processor to retain this information for 6 months after the event has passed, in order to fulfil legal consumer obligations, and then securely destroy the personal data attached to ticket sales. We retain only the total number of tickets sold.

Images of you recorded on our CCTV

It is a condition of our license for the venue to contain CCTV for the purposes of the prevention and detection of crime. Information recorded in our venue is stored by us for a period of 25 days and thereafter destroyed. We may need to share data from CCTV from time to time to comply with the law.

Information provided through Complaints

We have two separate complaints processes at GSASA and GSASA Ltd. One is for activities specific to the Students' Association, and another is for complaints about our activities or behaviour in our venue. Our approach to data protection is the same for both complaints procedures.

Information you provide to us via the complaints process will be stored securely digitally for the purposes of investigation and the processing of your complaint. After an outcome for you complaint has been reached and communicated to you, we will keep this data and communications from you for the period of 1 year. After this time, data relating to your complaint will be securely destroyed.

European Economic Area (EEA)

GSASA and GSASA Ltd. use Google Suite Basic cloud storage for the purposes of file sharing and collaborative working between staff, as well as for the management of calendars and email communications. The use of this may result in your data being stored in servers outside of the EEA. For guidance on Google Suite's compliance with GDPR please refer to https://gsuite.google.com/terms/dpa_terms.html

Automated Decision Making

No decisions made at GSASA and GSASA Ltd are made using automated decision making

Accurate Data

We will only collect personal data to the extent that is required for the specific purpose notified to the data subject.

Your Rights and GDPR

You have certain rights under Data Protection Legislation which can be exercised by contacting our Data Protection Officer: General Manager, Lauren MacFadyen.

As part of your rights, you may:

- Seek confirmation as to whether or not personal data concerning you is being processed;
- exercise your right to access the personal data held about you by making a subject access request in accordance with Data Protection Legislation. Until 25 May 2018 we may charge a fee of £10 for such requests. Thereafter we may charge a reasonable fee when a request is manifestly unfounded or excessive;
- rectify inaccurate or incomplete information we hold about you;
- delete in specific circumstances set out in Data Protection Legislation information we hold about you;
- ask us not to process your personal data for marketing purposes or for purposes based on our legitimate interests;

- request the transfer of your personal data to another party in certain specific circumstances as set out in Data Protection Legislation;
- where you have provided consent, withdraw your consent at any time.