

## LFS Governors Privacy Policy

### 1. Introduction

This policy is to explain when and why the London Film School (“LFS”, “we”, “our”, “us”) collects personal information about Governors (“you”, “your”) and how it is processed. We aim to be clear about data collection, storage, usage and your rights and to assure you that we would not use your data in a way you would not want or expect us to.

### 2. Scope

This policy applies to all members of the Governing Body who may otherwise be referred to as Governors, Trustees or Directors of the London Film School.

### 3. Purpose of Data Collection and Processing

LFS needs to hold and process personal data about you for a number of administrative and statutory purposes, namely:

- a) To put in place and maintain our governance structure;
- b) To administer the London Film School’s governance systems and processes;
- c) To inform you about proceedings and meetings of the Governing Body, its subcommittees and the Association;
- d) To provide IT resources, including email accounts and access to other systems;
- e) To ensure we can fulfil our statutory, regulatory and legal obligations;
- f) To carry out audits (both internally and externally) to ensure compliance with our statutory, regulatory and legal obligations;
- g) To ensure safety and prevent and detect crime, including the use of CCTV.

#### 3.1. Who Has Access to Your Data and How Is It Shared?

Access to your data in our databases and systems is limited to LFS employees and only for the purposes outlined in section 3.

LFS does not sell data of members of the Association to third parties. LFS also does not share your data with third parties for marketing purposes.

##### 3.1.1. Sharing Your Data with Other Third Parties

We will only share your personal information if required by law, to ensure we meet our statutory requirements, because it is in the public interest or because it is required for a third party’s legitimate interest. This includes (but is not limited to) Companies House, the Charity Commission, government agencies both within and outside of the UK, regulatory bodies and auditors.

Information may also be shared with third parties in cases where we need to establish, exercise or defend legal claims.

### 4. What Data Do We Hold, How Do We Collect It and Where Do We Store It?

We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as it is necessary for the relevant activity.

#### 4.1. Data Held by LFS About Members of the Governing Body

In order for LFS to meet its legal obligations we collect the following information from you when you are elected to join the governing body:

- a) Your full name

- b) Your date of birth
- c) Your nationality
- d) Your occupation
- e) Your correspondence address
- f) Your residential address
- g) Your country of residence
- h) Details about any other director- or trusteeships
- i) Your email address
- j) Your phone and/or mobile number
- k) A statement that you accept the objects and regulations laid down in the Memorandum and Articles of Association.

Further, we will also note the date on which you joined the Governing Body ('appointment date') and, at the end of your tenure, the date on which you resigned from or left the Governing Body ('resignation date').

When submitting expense claims, additional information will need to be collected, stored and processed, including your bank account details.

Any records pertaining to any fees paid be retained by the Finance Department for up to six years following the end of the fiscal year to which they relate.

Finally, additional data may be collected and stored by providers of third party applications used by LFS. This may include IP addresses of users, any location information contained there, and any actions taken by a user while signed into their account, including a timestamp, which may be stored in an activity log.

#### 4.2. Data Storage

Data about members of the governing body is stored in various databases and systems used by LFS to conduct its business. Access to those databases is secure and restricted to LFS employees who require it to perform their duties.

Some of these databases and systems used are provided and hosted by a third-party provider who will publish their own privacy policies.

LFS is committed to reviewing privacy and data protection policies of providers of third-party systems on a regular basis.

Portable data storage devices (including, but not limited to USB flash drives, magnetic tapes and optical discs) are not used to store, process or transfer personal information, but may be used to stored and transfer other types of data.

#### 5. Data Retention by LFS

We require to hold, process and retain your personal data processed for the duration of your tenure as a governor and after you resign from or leave the governing body, until the statutory accounts of the fiscal year in which you were a member of the governing body have been signed.

Details of your tenure as member of the governing body will be included in the statutory accounts which are retained by us for up to six years following the end of the fiscal year to which they relate.

Any records pertaining to any financial transactions are retained by the Finance Department for up to six years following the end of the fiscal year to which they relate.

CCTV footage recorded by LFS's systems is normally stored for 28 days. CCTV footage may be retained beyond 28 days if it is likely to be required to establish, exercise or defend legal claims.

## 6. Data Retention by Third Parties

As part of our legal obligations, your personal information will be included in documentation submitted to or shared otherwise with government agencies both within and outside of the UK, regulatory bodies and auditors.

Some of these third parties will retain your information beyond our own retention period if:

- I. it is a statutory requirement, or
- II. it is in the public interest, or
- III. it is required for a third party's legitimate interest.

## 7. Updating Your Data

It is important to us that we always hold the most-up-date information about you. To update your data held by LFS, please email [my.data@lfs.org.uk](mailto:my.data@lfs.org.uk).

Once a request has been received, it is normally processed within one month.

## 8. How Do We Contact You?

Our communications are normally by email and most communications are only sent out via email. In some instances, however, we may also contact you by phone (mobile or home). In some cases, we will also contact you by post.

Wherever possible, you will normally be contacted via an LFS email address which we will provide you with when you join the governing body. In some circumstances, however, the need may arise to contact you on your personal email account(s).

You may restrict the usage of your personal email address as outlined in section 9.3.

Beyond our data collection to ensure we fulfil our statutory and legal obligations, you have the right to specify what you like us to communicate with you about, more specifically:

- a) LFS newsletter
- b) LFS workshops newsletter
- c) LFS festivals digest
- d) LFS events
- e) Fundraising
- f) Any personal communication pertaining to any films created during your studies and related queries received by third parties (e.g. exhibition and distribution)

If you have previously opted in to receiving the LFS newsletter, LFS workshops newsletter, emails about events or fundraising and would like to no longer receive those email, you can opt out by emailing [my.data@lfs.org.uk](mailto:my.data@lfs.org.uk). It is, however, not possible for you to opt out of receiving communications related to your membership of the governing body.

## 9. Your Rights

### 9.1. Right to Access

Members of the Association have the right to access the personal and supplementary information held about them by the London Film School.

To access this information, please email [my.data@lfs.org.uk](mailto:my.data@lfs.org.uk).

Information will be provided at the latest within one month of receipt.

## 9.2. Right to Erasure

At the point where there is no longer a statutory or legal requirement for us to process your data, you have the right to ask us to stop processing your personal data.

We will, however, retain some information for up to six years following the end of the fiscal year to which the information relates, more specifically:

- a) Your full name
- b) Your date of birth
- c) Your nationality
- d) Your occupation
- e) Your correspondence address
- f) Your residential address
- g) Your country of residence
- h) Details about any other director- or trusteeships

Most data that remains in our database(s) can only be accessed by relevant staff for the purposes of meeting our legal obligations. Some personal information, however, is publicly available as part of documentation or information published as required by regulation, statute or other legal instrument.

To exercise your right to erasure, we suggest that you send us an email at [my.data@lfs.org.uk](mailto:my.data@lfs.org.uk). You may also make your request verbally by contacting a member of the Management Team who will confirm your request in writing and pass on your request to relevant members of staff.

Your request will be processed with one month and after having received and processed your request, we will no longer contact you by email, phone or post or any other means.

## 9.3. Right to Restrict Processing

You have the right to restrict the way in which your data is processed as long as the processing falls outside of our legal, statutory or regulatory obligations.

To exercise your right to restrict processing, we suggest that you send us an email at [my.data@lfs.org.uk](mailto:my.data@lfs.org.uk). You may also make your request verbally by contacting a member of the Management Team who will confirm your request in writing and pass on your request to relevant members of staff.

Your request will be processed with one month.

## 9.4. Right to Object

You have the right to object to your data being used for purposes of scientific/historical research and statistics.

To exercise your right to object, please email [my.data@lfs.org.uk](mailto:my.data@lfs.org.uk).

## 9.5. Rights in Relation to Automated Decision Making and Profiling

LFS does not use automated decision making or profiling in the context of members of the governing body.

## 10. Changes to our Privacy Policies

Our privacy policies are reviewed regularly, usually on an annual basis. Updates will be posted on the LFS 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.

## 11. Version Control

Version Number	Changes	Author, Title	Date
0.1	-	Philip Range, Academic Registrar	04/05/2018
0.2	Comments from Michelle Barkwith, Head of HR, added	Philip Range, Academic Registrar	15/05/2018
0.3	Comments from GDPR Working Group added	Philip Range, Academic Registrar	17/05/2018
0.4	Feedback from Governors incorporated	Dan Lawson, Acting Chief Operating Officer	18/05/2018
1.0	Approved by Management Team 21/05/18	-	21/05/18