

ROYAL
ACADEMY
OF
DANCE

Privacy Notice for
Service Providers

Privacy Notice for Service Providers

Issued: 11 June 2018

Revised: N/A

1. What is this notice for?

The Royal Academy of Dance (RAD) has prepared this notice to make sure that you have the information to which you are legally entitled about how we handle your personal information as a person who provides services to the RAD.

You are a service provider if you work on a non-permanent basis, whether as a casual or freelance worker, independent contractor, consultant, professional advisor, volunteer, trustee, or as any other third party engaged to carry out work for us, and who has access to our premises or our internal systems. If you are an employee of the RAD this notice does not apply to you: please see the Privacy Notice for Employees available on SelectHR. If you are a trustee of the RAD this notice does not apply to you: please see the Privacy Notice for Trustees available from the HR department.

If you have any comments or questions about your personal information and/or any of the information in this notice, please contact us via hr@rad.org.uk.

2. What types of information does the RAD collect about you and where does it come from?

Types of information

In the course of your engagement by the RAD we may process personal information about you and your dependents, beneficiaries and other individuals whose personal information has been provided to us.

The types of personal information we may process include, but are not limited to:

- Identification data – such as your title, name, gender, photograph, date of birth and ID.
- Contact details – such as home and business address, telephone/email addresses and emergency contact details.
- Engagement details – such as position, office location, terms of engagement and sickness/holiday records (where applicable).

- Background information – such as academic/professional qualifications, education, CV/résumé, and criminal records data (for vetting purposes, where permissible and in accordance with applicable law).
- National identifiers – such as national ID/passport details, immigration/visa status and social security or national insurance numbers.
- Financial information – such as bank details, tax information, fees and expenses.
- IT information – information required to provide access to company IT systems and networks (and information collected by / through those systems) such as IP addresses, log files and login information. For further information on how IT information is processed, please see the [RAD Monitoring](#) and [IT Acceptable Use Policy](#).
- Dietary and health information, including allergies and food preferences.

We may also process special personal information relating to you. Special personal information includes any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs, trade union membership, health or disability information, information about your sex life, genetic data, or biometric data for the purposes of unique identification.

As a general rule, we try not to collect or process any special personal information about you, unless authorised by law. However, in some circumstances we may need to collect, or request on a voluntary disclosure basis, some special personal information for legitimate engagement-related purposes: for example, information about your ethnic origin or gender for the purposes of equal opportunities monitoring, compliance with anti-discrimination laws and for government reporting obligations; or information about your physical or mental condition to provide work-related adjustments, health and insurance benefits or to manage absences from work.

Sources

Usually you will have provided the information we hold about you but there may be situations where we collect information from other sources. For example, we may collect the following:

- Certain background information (set out above) from recruitment agencies engaged by the RAD.
- Information about any "live" criminal proceedings collected from third party records checking agencies (where it is lawful to process such information).
- Information about your previous role(s) and other information about your suitability to work at the RAD from any referee provided by you.
- Certain information about your performance, conduct, or other information relevant to formal internal procedures (e.g. disciplinary or whistleblowing procedures), from organisations you routinely work with.
- Information about your health, including your fitness to carry out work and/or any adjustments to be considered from your GP, other specialist medical adviser or the RAD's appointed medical expert.

- Information on accidents or incidents from the RAD's insurers and their appointed agents, where they are involved.
- Information on tax payable from local tax authorities.
- Information collected through our IT systems and other devices as set out above and in the [RAD Monitoring Policy](#) and [IT Acceptable Use Policy](#).
- Information about your entitlement to participate in, or receive payments under, any pension scheme provided by the RAD, from the relevant benefit provider or its appointed agent (where applicable).

3. Why does the RAD process your information?

The RAD processes your information for numerous reasons, namely for:

(i) Recruitment purposes

Where you have successfully applied for a position at the RAD, the data collected during the recruitment process is retained. Further information on the way in which we handle personal information during the recruitment process is available in our [Recruitment Privacy Notice](#)

(ii) Work or services related purposes

Once you become a service provider to the RAD, we collect and use your personal information for the purpose of managing our working relationship with you: for example, your bank account and payment details (so that we can pay you) and details of your next of kin (for emergency contact purposes).

We process your personal information through a human resources system and an accounting system which are tools that help us to administer HR and service provider payments.

(iii) The RAD directory

We maintain a global directory of employees and some service providers on our human resources system which may contain your professional contact details (such as your name, location, photo, position and contact details). This information will be available to everyone in the RAD to facilitate cooperation, communication and teamwork.

(iv) *Other legitimate business purposes*

We may collect and use personal information when it is necessary for other legitimate purposes, such as:

- To help us conduct our business more effectively and efficiently: for example, for general HR resourcing, IT security/management, accounting purposes, or financial planning; and/or
- To investigate violations of law or breaches of our own internal policies, whether by you or any other employee or service provider. For instance, we may monitor your browsing or communications activity or location when using our devices or systems if we suspect that you have been involved in phishing scams, fraudulent activity or activities in competition with or inconsistent with your work for the RAD.

(v) *Law-related and other purposes*

We may also use your personal information where we consider it necessary for complying with laws and regulations, including collecting and disclosing personal information as required by law (e.g. tax, health and safety, anti-discrimination and other employment related laws), under judicial authorisation, to protect your vital interests (or those of another person), or to exercise or defend the legal rights of the RAD.

4. Who does the RAD share your information with?

We take care to allow access to personal information only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it. Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure the information is used in a manner consistent with this notice and that the security and confidentiality of the information is maintained.

(i) *Transfers to other offices of the RAD*

We may share your information with another office of the RAD around the world if you move to work for that office or travel to other destinations in which the RAD operates as part of your work in order to administer your preferences, human resources and, if applicable, immigration requirements, as well as for other legitimate business purposes such as IT services/security, tax and accounting, and general business management.

(ii) *Transfers to third party service providers*

In addition, we make certain personal information available to third parties who provide services to us. We do so on a "need to know basis" and in accordance with applicable data privacy law.

For example, some personal information will be available to third party companies who provide us with:

- Pension services, e.g. **Aegon** – read their [Privacy Policy](#)
- Our HR System, accounting system and HR-related services, e.g. **Select HR** and **Access Dimensions** – read their [Privacy Policy](#)
- Services in relation to criminal record screening, e.g. **Due Diligence Checking Ltd** read their [Privacy Policy](#); and
- Auditors, advisors, legal representatives and similar agents in connection with the advisory services they provide to us for legitimate business purposes and under a contractual prohibition of using the personal information for any other purpose.

(iii) *Transfers to other third parties*

We may also disclose personal information to third parties on other lawful grounds, including:

- To comply with our legal obligations, including where necessary to abide by law, regulation or contract, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant;
- In response to lawful requests by public authorities (including for tax, immigration, health and safety, national security or law enforcement purposes);
- As necessary to establish, exercise or defend against potential, threatened or actual litigation;
- Where necessary to protect the vital interests of you or another person;
- In connection with the funding, growth or other charitable activities of the RAD; and/or
- With your consent.

5. **What is the legal basis for the RAD's processing of your personal information?**

Our legal bases for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. Some of the bases we rely on are set out above.

However, we will normally collect personal information from you only where it is in our legitimate interests (as summarised above in Section 3, which are not overridden by your rights, particularly taking into consideration the safeguards that we put in place, for example, those outlined in Section 4 above), where we need the personal information to perform a contract with you (i.e. to administer a professional relationship with us), to comply with applicable employment and/or immigration laws and regulations, where we have your consent to do so (in which case you have the right to withdraw your consent at any time), to protect your vital

interests or those of another person, and/or to protect the rights and interests of the RAD, our employees, applicants and others, as required and permitted by applicable law.

If we collect special personal information about you we will normally only do so in circumstances where you have made the data public, to comply with applicable employment and/or immigration laws and regulations, for the assessment of your working capacity, to protect your vital interests or those of another person, to establish, exercise or defend legal claims, and/or for reasons of substantial public interest in accordance with relevant law.

Where we request personal information and special personal information from you, you can choose not to provide that information to us. However, unless otherwise indicated, the information we request from you is required in order to enter into our contract of engagement with you or in order to comply with our legal obligations. Failure to provide it prevents us from effectively administering our contractual relationship with you (including any related benefits where applicable) and/or complying with our legal obligations, which may mean we are unable to continue your engagement.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us via hr@rad.org.uk.

6. How will your information be transferred if it is transferred out of this country?

As we provide opportunities around the world, we may need to transfer your personal information to a country other than the UK if you move to work for another office of the RAD or travel to other destinations in which the RAD operates as part of your work. When we export your personal information to a different country, we will take steps to ensure that such data exports comply with applicable laws. For example, if we transfer personal information from the European Economic Area to a country outside it, such as the United States, we will implement an appropriate data export solution such as entering into EU standard contractual clauses with the data importer, or taking other measures to provide an adequate level of data protection under EU law. If and when such a transfer takes place and you want access to information about the safeguard in place please contact us via hr@rad.org.uk.

7. How long does the RAD keep your data for?

Personal information will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this notice or as otherwise required by applicable law. Generally this means your personal information will be retained until the end of your engagement with us plus a reasonable period of time thereafter to respond to inquiries or to deal with any legal matters (e.g. judicial or disciplinary actions) or to document the proper deductions during and on termination of your engagement (e.g. to tax authorities).

8. What rights do you have in relation to your information?

You have numerous rights available to you under applicable data protection laws and may exercise them as follows:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us via hr@rad.org.uk.
- In addition you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us via hr@rad.org.uk.
- If we have collected and processed your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information please contact your local data protection authority. Of course, we would prefer you to raise any concerns with the RAD directly first via hr@rad.org.uk.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

9. How will you know if this notice changes?

This notice may be updated periodically to reflect any necessary changes in our privacy practices. In such cases, we will inform you by email and indicate at the top of the notice when it was most recently updated. We encourage you to check your email regularly in order to ensure you are aware of the most recent version of this notice.