



URDANG ACADEMY

The Old Finsbury Town Hall Rosebery Avenue, London EC1R 4RP
+44 (0)20 7713 7710 • theurdang.london • info@theurdang.london

Urdang International Website Privacy Policy



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Privacy policy - Urdang Website

Urdang is committed to protecting your privacy online. Please read the following privacy policy to understand how we use and protect the information obtained from those visiting and using the Urdang Website. The Site is operated by Urdang.

If you have any requests concerning your personal information or any queries with regard to our processing please contact the College Administrator

By using the Site you consent to the collection/retention and use of your personal information in accordance with this policy.

What information do we collect?

- We collect email addresses.
- Online applications: if you make an online application to a course we will ask for your name, email address, geographical address and other personal information.
- From time to time we will ask you for further information, for example if you decide to accept your course offer and enrol with Urdang.
- Information for external agencies related to education and compliance for Urdang, your course or participation.

How do we use your information?

We use your information:

- To enable us to supply you with the services and information which you have requested;
- To ensure that content from the Site is presented in the most effective manner for you and for your computer, handset, personal device
- To analyse the information we collect so that we can administer, support and improve and develop the Site;
- To provide you with information or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To notify you about changes that may affect you.

We may contact you by post, telephone or fax as well as by email, SMS and MMS. If you change your mind about being contacted in the future by any of these means then please contact: karen@theurdang.london or federico@theurdang.london who will alert Urdang Data Controllers.



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How do we share information?

Urdang collect and store the addresses and email addresses of customers who study with us or who enquire direct to us.

Data is used for a range of college activities, including the mailing of publications, the promotion of benefits and services provided by the college, notification of events. We may also contact you on occasion with information we think might be of interest to you. Under the terms of the GDPR Data Protection Act you have the right to object to the use of your data for any of the above purposes. If you do wish your name to be removed from our mailing lists please contact karen@theurdang.london or federico@theurdang.london letting us know what you received.

How we store your information

Where we have given you (or where you have chosen) a password that enables you to access certain parts of the Site, you are responsible for keeping this password confidential. You must not share passwords with anyone.

Although we maintain a number of safeguards, fraudulent email requests are occasionally delivered to staff and students. We will **never** ask for your username or password by email. Any message that does so should be treated as a potential breach of security, no matter how legitimate it may appear.

If you are in any doubt, **do nothing** until you have spoken to a Data Controller.

Unfortunately the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

International enquiries

The data sent in international enquiries to Urdang will be used for the purposes of dealing with your enquiry, and sending you relevant information about Urdang. If you wish to remove yourself from Anglia Ruskin Urdang's database please contact karen@theurdang.london or federico@theurdang.london

Disclosure of your information

Authorised personnel within Urdang will be able to access the information you provide to us. We may also disclose your information to other third parties who act for us for the purposes set out in the policy or for purposes approved by you.

Please note that where you nominate a third party or an agent to discuss your application/course with us or to make decisions on your behalf and you provide contact details for that third party/agent, you are consenting for us to disclose information relating to your application/course to that third party/agent.

Please note that countries outside the European Economic Area do not always have the same strong data protection laws. However, we will always take steps to ensure that your information is used by third parties in accordance with the terms of this Privacy Policy.

Unless required or permitted to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.



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Other websites

The Site may contain links to other web sites which are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

Cookies

Cookies are small text files stored on your device (desktop, tablet, mobile phone etc.) by your device's web browser. They relate to a specific site and can be used to enhance that site's functionality and your interaction with it; they may also be used for usage tracking, research, targeting etc.

Urdang uses cookies for a number of purposes including (but not limited to):

- to monitor how our Site is used, to plan improvements to user experience, and
- to enhance the functionality of the Site.

Modifying cookie settings

You can also control the use of cookies on your device by adjusting your web browser preferences, choosing to allow them, block them, only allow them from a specific site or only allow certain types of cookies.

Further information about how to manage cookies on some of the most commonly used web browsers can be found below:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Apple Safari \(desktop\) / Safari \(mobile\)](#)
- [Google Chrome \(desktop\) / Chrome \(mobile\)](#)
- [Opera](#)



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To edit settings for Local Shared Objects, also known as 'flash cookies', used by some Adobe Flash Player applications, guidance can be found on the [Flash Player Help](#).

Access rights

You have the right to access the personal data that is held about you in our records and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you would like to do this, you should contact karen@theurdang.london or federico@theurdang.london

We are entitled by law to charge a fee of £10 to meet our costs in providing you with details of the information that we hold about you. In the first instance you will need to complete a request form. You will be required to personally collect your data providing two types of valid proof of identity one needing to be photographic proof and the other to confirm your address and signature.

Intellectual Property Rights

The information, images and documents on the Urdang website are copyright of Urdang unless otherwise stated. It is forbidden to reproduce any information without prior consent from Urdang.

Web statistics

We monitor website traffic to assist in the continuous improvement and development of the site, but do this only by monitoring IP addresses that are not linked in any way to any personal data, retaining the anonymity of our visitors.

Image capture

Urdang produces a range of published materials and online information. We often take photographic/video images of subjects in order to enhance and illustrate our materials and make them more motivating and inspiring to our audiences.

For children under 16 years of age, full parental/guardian consent is required and Urdang has an Image Consent Form which should be completed. This is available from karen@theurdang.london or federico@theurdang.london or a course leader/ admissions officer.

For children between 12 and 16 years of age, who have a sufficient understanding of the consent process and its implications for them, the child should be involved in completing the form and their consent should be sought. The child may also sign the form.

As it is mandatory for Urdang to obtain permission prior to each photographic/video session, it is necessary for each child to have a copy of this form signed by the parent/guardian prior to the relevant photographic/video session.

Urdang acknowledges its responsibilities in capturing images by photography or other means under the provisions of the following legislation;

The Children and Young Persons Act 1963: Urdang undertakes to seek a licence where necessary from the appropriate local authority for any performance activity in which children are taking part and which may be recorded with a view to being broadcast, published or shown to the public.

The Protection of Children Act 1978: Urdang recognises that it is a criminal offence to take, permit to be taken, distribute, have in one's possession or publish indecent photographs (including films and other imagery) of children.



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The Human Rights Act 1998: Urdang recognises an individual's rights to privacy as protected by this Act.

The Data Protection Act 1998 and General Data protection Regulations 2018: Urdang undertakes to inform all those whose images may be recorded (or their parents/guardians if under 18 years of age) of the purposes for which the images may be used by Urdang.

In this context Urdang informs all persons taking part in activities that they may be photographed, filmed, videoed or otherwise captured in image form. Where possible and practical to do so, Urdang seeks written consent to image capture. Where this is not possible for practical reasons, unless express objections are received, individuals attending an event at Urdang are deemed to have given their consent by attending or remaining at the event. Any queries or complaints should be raised with the event host in the first instance.

Changes to this Privacy Policy

Urdang may from time to time change this Privacy Policy or change, modify or withdraw access to this Site at any time with or without notice. However if this Privacy Policy is changed in a material, adverse way, Urdang will post a notice advising of such change at the beginning of this policy. We recommend that you revisit this Privacy Policy from time to time to learn of any such changes to this Privacy Policy.



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Urdang Int. General Public Privacy Policy

Dated Oct 2019



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Data protection compliance statement – Urdang Academy

This document demonstrates our commitment to protecting the privacy and security of your personal information. It contains information regarding how we collect and use personal data or personal information about you in accordance with the General Data Protection Regulation (GDPR) and all other data protection legislation currently in force.

Pursuant to that legislation, when processing data we will;

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your study in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be lost or destroyed or used for anything that you are not aware of or have consented to (as appropriate)

Urdang have a team of “data controllers”. This means that we are responsible for determining the purpose and means of processing personal data relating to you.

“Personal data”, or “personal information”, means any information relating to an identified, or identifiable individual in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

There are “special categories” of sensitive personal data, meaning data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health conditions, sex life or sexual orientation, genetic data, and biometric data which require a higher level of protection.

This data protection compliance statement (privacy notice) applies to current and former customers.



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DETAILS OF INFORMATION WE WILL HOLD ABOUT YOU

The list below identifies the kind of data that we will hold about you:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- date of birth
- marital status
- bank account details, payroll records and tax codes
- attendance, sickness absence etc
- copy of identification/ passport
- information included on applications you may complete
- information used for equal opportunities monitoring about your sexual orientation, religion or belief and ethnic origin
- medical or health information including whether or not you have a disability
- CCTV footage and other information obtained through electronic means such as building entry card records
- information about your use of our information and communications systems
- References and personal details of referees

The following list identifies the kind of data that that we will process and which falls within the scope of “special categories” of more sensitive personal information

- information relating to your race or ethnicity
- information about your health, including any medical conditions and disabilities
- information about criminal convictions and offences

METHOD OF COLLECTION OF PERSONAL INFORMATION

Your personal information is obtained through your contact with Urdang, this may be in the form of email, paper copy or verbal. Further information will be collected directly from you when you complete forms at the start of your employment, course or booking, for example, your bank and next of kin details. Other details may be collected directly from you in the form of official documentation such as your driving licence, passport or other right to reside evidence. Data may be collected during the course of your engagement with us to enable its continued existence or development. Personal data is kept in secure data files or within our HR and IT systems.



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PROCESSING INFORMATION ABOUT YOU

We will only administer personal information in accordance with the lawful bases for processing. At least one of the following will apply when we process personal data:

- consent: You have given clear consent for us to process your personal data for a specific purpose.
- contract: The processing is necessary for a contract we have with you, or because we have asked you to take specific steps before entering into a contract.
- legal obligation: The processing is necessary for us to comply with the law (not including contractual obligations).
- vital interests: the processing is necessary to protect someone's life.
- public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests.

LAWFUL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

We consider that the basis for which we will process the data contained in the list above (see section above - **details of information we will hold about you**) is necessary for the performance of the contract we have with you and to enable us to comply with our legal obligations. Occasionally, we may process personal information about you to pursue legitimate interests of our own or those of third parties, provided there is no good reason to protect your interests and your fundamental rights do not override those interests.

The circumstances in which we will process your personal information are listed below.

- making decisions about who to offer opportunity to
- responding to requests from third parties such as a reference request
- maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained
- offering a method of recourse for you against decisions made about you via a grievance procedure
- gaining expert medical opinion when making decisions about your fitness for work .
- planning and restructuring exercises
- dealing with legal claims made against us
- preventing fraud
- ensuring our administrative and IT systems are secure and robust against unauthorised access
- Be able to contact you for late payments, unpaid invoices or debt collection



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There may be more than one reason to validate the reason for processing your personal information.

LAWFUL BASIS FOR PROCESSING “SPECIAL CATEGORIES” OF SENSITIVE DATA

“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:

- consent: You have given clear consent for us to process your personal data for a specific purpose.
- contract: The processing is necessary for a contract we have with you, or because we have asked you to take specific steps before entering into a contract.
- legal obligation: The processing is necessary for us to comply with the law (not including contractual obligations) and meets the obligations under our data protection policy.
- vital interests: the processing is necessary to protect someone’s life.
- public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law and meets the obligations under our data protection policy. (For example in the case of equal opportunities monitoring)
- legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests (For example to assess your capacity to work on the grounds of ill health)

Occasionally, special categories of data may be processed where you are not capable of giving your consent, where you have already made the information public or in the course of legitimate business activities or legal obligations and in line with the appropriate safeguards.

Examples of the circumstances in which we will process special categories of your particularly sensitive personal information are listed below (this list is non-exhaustive):

- in order to protect your health and safety
- to determine if reasonable adjustments are needed or are in place
- to administer benefits
- In order to fulfill equal opportunity monitoring or reporting obligations

Where appropriate, we may seek your written authorisation to process special categories of data. Upon such an occasion we will endeavor to provide full and clear reasons at that time in order for you to make an informed decision. In any situation where consent is sought, please be advised that you are under no contractual obligation to comply with a request. Should you decline to consent you will not suffer a detriment



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INFORMATION ABOUT CRIMINAL CONVICTIONS

Information regarding criminal convictions may be processed in accordance with our legal obligations. Occasionally we may process such information to protect yours, or someone else's interests and you are not able to give your consent or we may process such information in cases where you have already made the information public. Such information may be sought as part of the recruitment process or in the course of your study with us.

We anticipate that we will process information about criminal convictions for DBS and safeguarding purposes.

AUTOMATED DECISION-MAKING

We do not anticipate that any of our decisions will occur without human involvement. Should we use any form of automated decision making we will advise you of any change in writing.

SHARING DATA

Your data will be shared with colleagues within the Company where it is necessary for them to undertake their duties. This includes, for example, your course leaders and tutors for their management of you, the Student records and Admissions departments for maintaining personnel records and the finance department for administering payment under your contract.

It may be necessary for us to share your personal data with a third party or third party service provider (including, but not limited to, contractors, agents or other associated/group companies) within, or outside of, the European Union (EU). Data sharing may arise due to a legal obligation, as part of the performance of a contract or in situations where there is another legitimate interest (including a legitimate interest of a third party) to do so.

The list below identifies which activities are carried out by third parties on our behalf:

- IT services
- legal advisors
- security
- insurance providers
- Disclosure and Barring Service
- Recruitment agencies
- Debt Collection Agencies



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Data may be shared with 3rd parties in the following circumstances:

- in the process of regular reporting activities regarding our performance,
- with regards to a business or group reorganisation, sale or restructure,
- in relation to the maintenance support and/or hosting of data
- to adhere with a legal obligation
- in the process of obtaining advice and help in order to adhere with legal obligations
- To chase late payments or unpaid invoices
- Agencies such as the Health and Safety Inspectorate, HM Revenue Service, Police or Government agency.

If data is shared, we expect third parties to adhere and comply with the GDPR and protect any data of yours that they process. We do not permit any third parties to process personal data for their own reasons. Where they process your data it is for a specific purpose according to our instructions.

We do not anticipate that we will transfer data to other countries.

DATA SECURITY

As part of our commitment to protecting the security of any data we process, we have put the following measures in place

- Secure drives on our computer network
- Restrictions on who can access the data and why
- Encrypted password access to HR data

If you would like further details please contact Craig Philips.

In addition, we have put further security measures in place to avoid data from being accessed, damaged, interfered with, lost, damaged, stolen or compromised. In cases of a breach, or suspected breach, of data security you will be informed, as will any appropriate regulator, in accordance with our legal obligations.

Any data that is shared with third parties is restricted to those who have a business need, in accordance with our guidance and in accordance with the duty of confidentiality.

DATA RETENTION

We anticipate that we will retain your data as part of the recruitment process for no longer than is necessary for the purpose for which it was collected.



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We have given consideration to the following in order to decide the appropriate retention period:

- quantity
- nature
- sensitivity
- risk of harm
- purpose for processing
- legal obligations

At the end of the retention period, upon conclusion of any contract we may have with you, or until we are no longer legally required to retain it, it will be reviewed and deleted, unless there is some special reason for keeping it. Occasionally, we may continue to use data without further notice to you. This will only be the case where any such data is anonymised and you cannot be identified as being associated with that data

YOUR RIGHTS IN RELATION TO YOUR DATA

We commit to ensure that any data we process is correct and up to date. It is your obligation to make us aware of any changes to your personal information.

In some situations, you may have the;

- **Right to be informed.** This means that we must tell you how we use your data, and this is the purpose of this privacy notice.
- **Right to request access.** You have the right to access the data that we hold on you. To do so, you should make a subject access request
- **Right to request correction.** If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it.
- **Right to request erasure.** If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it.
- **Right to object to the inclusion of any information.** In situations where we are relying on a legitimate interest (or those of a third party) you have the right to object to the way we use your data where we are using it.
- **Right to request the restriction of processing.** You have the right to ask us to stop the processing of data of your personal information. We will stop processing the data (whilst still holding it) until we have ensured that the data is correct.



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- **Right to portability.** You may transfer the data that we hold on you for your own purposes.
- **Right to request the transfer.** You have the right to request the transfer of your personal information to another party.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact Karen Farrell or Federico Angelini

Consequences of your failure to provide personal information

If you neglect to provide certain information when requested, it may affect our ability to enter into or continue with an employment contract with you, and it may prevent us from complying with our legal obligations.

Change of purpose for processing data

We commit to only process your personal information for the purposes for which it was collected, except where we reasonably consider that the reason for processing changes to another reason and that reason is consistent with the original basis for processing. Should we need to process personal information for another reason, we will inform you of this and advise you of the lawful basis upon which we will process.

Important note: We may process your personal information without your knowledge or consent, in compliance with the above rules (see above section - **lawful basis for processing your personal information**).

In the event that you enter into a study contract with us, any information already collected may be processed further in accordance with our data protection policy, a copy of which will be provided to you.

Image capture

Urdang produces a range of published materials and online information. We often take photographic/video images of subjects in order to enhance and illustrate our materials and make them more motivating and inspiring to our audiences.

For children under 16 years of age, full parental/guardian consent is required and Urdang has an Image Consent Form which should be completed.

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The Protection of Children Act 1978: Urdang recognises that it is a criminal offence to take, permit to be taken, distribute, have in one's possession or publish indecent photographs (including films and other imagery) of children.

The Human Rights Act 1998: Urdang recognises an individual's rights to privacy as protected by this Act.

The Data Protection Act 1998 and General Data protection Regulations 2018:

Urdang undertakes to inform all those whose images may be recorded (or their parents/guardians if under 18 years of age) of the purposes for which the images may be used by Urdang.

In this context Urdang informs all persons taking part in activities that they may be photographed, filmed, videoed or otherwise captured in image form. Where possible and practical to do so, Urdang seeks written consent to image capture. Where this is not possible for practical reasons, unless express objections are received, individuals attending an event at Urdang are deemed to have given their consent by attending or remaining at the event. Any queries or complaints should be raised with the event host in the first instance.

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QUESTIONS OR COMPLAINTS

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.