

# Privacy Policy: Supplier, Contractor & Commercial Clients

## **Introduction**

University of the Arts London Students' Union ("Arts Students' Union", "we", "our" or "us") promises to respect any personal data you share with us, or that we get from other organisations and keep it safe. We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect. We understand that the current UK Data Protection Legislation, the new General Data Protection Regulations (GDPR) and the Privacy and Electronic Communications Regulations (PECR), are the main legislation we must ensure we keep to. Facilitating our legal requirements, organisation policy and services to our suppliers and contractors through using your personal data allows us make better decisions, communicate more efficiently and, ultimately, ensure you receive the services required.

## **Where we collect information about you from**

### **We collect information in the following ways:**

When you as a supplier contact the Students' Union you provide us with certain personal data. When you register as a supplier/contractor with the Students' Union you provide us with certain personal data.

## **What personal data we collect and how we use it**

The type and quantity of information we collect and how we use it depends on why you are providing it.

### **Suppliers**

In registering and becoming a supplier we may ask you to provide us with the following personal information:

- Name
- Address
- Email
- Telephone number
- Bank Details
- Job Title
- VAT Registration
- Right to Work Documents

### **Contractor**

In registering and becoming a contractor we may ask you to provide us with the following personal information:

- Name
- Address
- Email
- Telephone number
- Bank Details
- Job Title
- VAT Registration
- Right to Work Documents

### **Commercial Clients**

In registering and becoming a commercial client we may ask you to provide us with the following personal information:

- Name
- Address
- Email Telephone number
- Bank Details
- VAT Registration
- Job Title

We will mainly use your data to administer our contracted duties with you. This includes processing payments, contacting you and ensuring that both parties satisfy any legal obligation that we are party to.

## **How we keep your data safe and who has access**

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff and contracted processors. Personal data collected and processed by us may be shared with Students' Union employees and volunteers and under strictly controlled conditions the following groups where necessary:

- Contractors
- 3 rd Party Processors such as ACT, Google, LSE and Exchequer.
- Service provider partners
- The LSE

Some of our processors run their operations outside the European Economic Area (EEA). Although they may not be subject to same data protection laws as companies based in the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law and satisfy conditions necessary for a transfer of data outside the EEA. This includes EU Model Contract Clauses and Privacy Shields if applicable. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

We may need to disclose your details if required to the police, regulatory bodies or legal advisors.

We will only ever share your data in other circumstances if we have your explicit and informed consent.

## **Data Retention**

We try and delete data as soon as we can and we will keep your data for as long as one or more of the following conditions apply:

- a) 6 years after the last financial year (our financial year ends in July) in which you or your organisation was paid.
- b) 6 years after the end of any contract that is held between you as an individual and the Union.

## **Keeping your information up to date**

We request that suppliers and contractors make best attempts to ensure data held by the Students' Union is up to date and accurate. In the event of any changes to data or the discovery of any inaccuracies please contact your main point of contact within the Union, so this can be updated as necessary.

## **Understanding the detail of our data security measures**

When we process your data we will have already carefully assessed the lawful basis (reason) for doing so, the parameters in which the data is processed, the length of time the data is held for, the secure storage of your data, an overview of this analysis can be accessed under the Documentation section on our [data protection webpage](#). Where we rely upon a legitimate interest to process your data we will have completed a legitimate interest assessment. The Students' Union operates a Data Protection, Information Security and Systems Policy which is supported by a practical handbook for our employees and a separate handbook for our volunteers. All employees and volunteers handling data are required to undertake general data protection training, these are done on an annual basis and third parties handling data are required to provide a contract which meets the requirements of the Information Commissioner's Office.

## **Your Rights about Your Data**

You have rights under Data Protection Legislation regarding your own personal data. We detail all of your actionable rights on our [data protection webpage](#). Depending upon the lawful basis that is required for the processing of the personal data above, some rights may or may not apply. Under our process of ensuring any rights upon request, we will inform you of what personal data is exempt from your request and the lawful basis why. If you have any questions please send these to [info@su.arts.ac.uk](mailto:info@su.arts.ac.uk), and for further information see the Information Commissioner's Office Guidance (<https://ico.org.uk/for-the-public/>)

## **Changes to this statement**

We may change this Privacy Statement from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on our Website or by contacting you directly.

If you have any questions, comments or suggestions, please let us know by contacting [info@su.arts.ac.uk](mailto:info@su.arts.ac.uk).