



Guildhall School of Music & Drama Student Accommodation Privacy Notice

This policy is of relevance to all students living in Sundial Court Accommodation

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Approved by Shimon Agur

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Version Control

Date	Amendments	Amended by

Introduction

Guildhall School of Music & Drama is committed to protecting the privacy and security of your personal information. This Privacy Notice provides important information about how Guildhall School of Music & Drama (through the Student Accommodation and Student Services Team) (“the School,” “we,” or “us”) manages its Data Protection responsibilities in respect of accommodation bookings and enquiries.

Applying for student accommodation (“Sundial Court”) is designed to work with your student ID (where your personal data as a student is stored), this notice should be read in conjunction with [Guildhall School Privacy Notice PNGS 18.1 and Higher Education Privacy Notice 18.1](#)

Who we are

Guildhall School is a department of the City of London Corporation (“the City of London”) and the City of London is the data controller. The City of London’s privacy notice which explains how the City uses your data can be found at www.cityoflondon.gov.uk/privacy

Contact: Comptroller and City Solicitor, Sophie Jordan,
at information.officer@cityoflondon.gov.uk

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This Privacy Notice applies to all students deciding to applying for student accommodation (“you” or “your”) (our “Student Accommodation”).

Please read this and other Privacy Notices carefully and contact our Data Protection Officer if you have any questions about our privacy practices or your personal information choices.

We may need to update this Privacy Notices from time to time. If changes made to this Privacy Notice are considered to be material, we will notify you of the changes.

Personal Information

The School is committed to the responsible handling and protection of personal information.

Personal Data, or personal information, means any information about an individual from which that person (a “Data Subject”) can be identified. It does not include data where the identity has been removed (anonymous data). The information will be Personal Data if a person can be identified either directly or indirectly, 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 person. For example personal data may include names, addresses, email addresses and telephone numbers; it may also include images in photographs or films and recorded telephone conversations.

Why we process your DATA

We collect, use, disclose, transfer, and store personal information to deliver our accommodation services to you and for our operational and business purposes as described in this Privacy Notice. We want to be clear about our privacy practices so that you are fully informed and can make choices about the use of your information, and we encourage you to contact us at any time with questions or concerns: sundial-accommodation@gsmd.ac.uk.

Legal basis for processing your personal data

Guildhall School of Music & Drama processes your personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The lawful bases we rely on for processing your personal data in relation to student accommodation include:

Contract : processing is necessary to enter into and administer your accommodation agreement (Licence to Occupy), including managing accommodation applications, bookings, payments, and communication with residents.

Legal obligation: processing may be necessary for compliance with legal or regulatory requirements, including safeguarding, health and safety obligations, financial record-

keeping, and obligations arising under the Counter Terrorism and Security Act 2015 (Prevent Duty).

Legitimate interests : we may process personal data where it is necessary for the legitimate interests of the School in managing accommodation services, ensuring the safety and wellbeing of residents, responding to complaints or incidents, monitoring accommodation usage, and improving our services. Where we rely on this basis, we ensure that our interests do not override your rights and freedoms.

Consent : where we use photographs or images of residents for marketing or promotional materials, we will seek your explicit consent. You may withdraw your consent at any time.

Special category data: where we process sensitive personal data such as health or disability information in order to provide appropriate accommodation adjustments, we do so in accordance with Article 9 of the UK GDPR and the Data Protection Act 2018, for reasons of substantial public interest and to support individuals with specific needs.

Types of personal information we collect

We collect personal information from you when you apply to our student accommodation.

The categories of personal information that we may collect, store and use about you include (but are not limited to):

- Your Student ID number (Registry will automatically provide our Student Accommodation and Student Services Team with the necessary student data linked with the School ID number, including the data listed below)
- Your name and contact details (email address and phone number)
- Date of Birth
- The course you have applied for
- Your accommodation preference
- Financial details (this will be for payment of the deposit and accommodation charges)

We process this data in order to enter into and administer the contract and License to Occupy for accommodation with you (if you do not provide this information this could limit the services we are able to provide you).

In addition we will also retain a record of any general enquiries, complaints, reports about accommodation usage, as well as any feedback you submit to us via our online form or survey results (anonymised where appropriate). We process this data typically because we have a legitimate interest in upholding our accommodation regulations, responding to complaints, and monitoring, evaluating, auditing and developing our accommodation services; and for compliance with the [Accommodation Code of Practise](#) (we will ensure that

any processing undertaken in this area is not overridden by your individual rights and freedoms).

Sensitive types of data

We may also need to process some sensitive personal information about you in order to properly provide the accommodation services. This is sometimes referred to as 'Special Category' personal data which includes *racial or ethnic origin, physical or mental health conditions, sexual orientation and biometric or genetic data*.

We will not need to process all these types of information for the purposes of providing accommodation, but we do need to ensure that in certain circumstances the accommodation that you are offered is suitable in the event you have any particular requirements (e.g. a disability).

In particular, we might ask you for:

- Your gender.
- Any disabilities or relevant health/medical information (for applicants applying for accommodation on medical grounds)

How we collect your data

In most cases the above data will be provided directly by you. We will, however, collect personal information from Registry and Student Service to help us maintain data accuracy and provide and enhance accommodation services.

How we use data about you

We have covered above why we require certain specific types of personal data from you for the provision of student accommodation services. In the course of providing those services we may also use your personal information for the following purposes:

- To provide you with information on products or services that you may request from us.
- To carry out our contractual obligations between you and us.
- Where it is necessary to comply with a legal obligation.
- To provide management statistics through reporting using accommodation services data which may be used by us to enhance the student experience.
- For security, safety and disciplinary purposes (through the use of CCTV and information to support our Student Code of Conduct, infringements on our License to Occupy)
- To ensure that content from our website or intranet is presented in the most effective manner for you and for your computer or device by gathering aggregate information about our users, using it to analyse the effectiveness and efficiency of communications.

- To ensure we meet our statutory obligations, including those related to diversity and equal opportunity.
- Photographs demonstrating our accommodation opportunities as part of general marketing materials, for example in our annual report, accommodation guides or materials. Personal data alongside photographs will only be used with explicit consent.
- To ensure compliance with the Prevent Duty under the Counter Terrorism & Security Act 2015
- To notify you about changes to our services.
- For the purposes of compliance with the Accommodation Code of Practise.

Who we share your data with

The School shares or discloses personal information when necessary to provide Services or conduct our business operations. When we share personal information, we do so in accordance with data privacy and security requirements. We may occasionally share non-personal, anonymised or pseudonymised, and statistical data with third parties.

We may share your personal information with third parties where required by law, where we have another legal requirement or legitimate interest in doing so. Third parties will only process your personal data on our instructions and where they have agreed to treat that information confidentially and to keep it secure.

Below are the parties with whom we may share personal information and why:

- Within the School: Associated entities or services around the world are provided data by a variety of School teams and functions, and personal information will be made available to them if necessary for the provision of Services, account administration, marketing, student support and technical support, for instance.
- Other third-party service providers: Our third-party service providers are not permitted to share or use personal information we make available to them for any other purpose than to provide services to us.
- Payment service providers.
- We may be required to use and retain personal information for legal and compliance reasons, such as the prevention, detection, or investigation of a crime; loss prevention; fraud or safeguarding. Accommodation records are typically retained in line with the Guildhall School retention schedule (7 years)
- We may also use personal information to meet our internal and external audit or governmental requirements, information security purposes, and as we otherwise believe to be necessary or appropriate.
 - (a) Under applicable law, which may include laws outside your country of residence;
 - (b) To respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include such authorities outside your country of residence;
 - (c) To enforce our terms and conditions; and

- (d) To protect our rights, privacy, safety, or property, or those of other persons.

All such third parties are prohibited from using your personal information except to provide these services, and they are required to maintain the confidentiality of your information. The School ensures such third parties handle your information in accordance with the GDPR (as applied, enacted and amended in UK law).

Your data protection rights

Under UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, you have a number of rights in relation to your personal data. These include the right to request access to the personal data we hold about you, to request that inaccurate or incomplete data is corrected, and in certain circumstances to request the deletion or restriction of processing of your personal data. You may also have the right to object to certain types of processing and to request that your data is transferred to another organisation.

If you wish to exercise any of these rights, please contact the Guildhall School Data Protection Officer at **information.officer@cityoflondon.gov.uk**.

If you are not satisfied with how your personal data has been handled, you also have the right to lodge a complaint with the UK Information Commissioner's Office (ICO), the UK's independent authority for data protection matters. Further information about your rights and how to complain can be found at:

<https://ico.org.uk/for-the-public/>