

Student Privacy Notice

This privacy notice explains how we use any personal data we process on students.

Data Controller and contact details

Spirit Studios is the trading name of Spirit SSR Ltd. Spirit SSR Ltd is the data controller of any personal data processed on students. Please use the following contact details if you have any questions about our privacy notice or the personal data we hold about you:

- By email: dpo@spiritstudios.ac.uk
- Or write to us at: Data Protection Officer, Spirit SSR Ltd, 65-69 Downing Street, Manchester, M1 7JE, UK

If you wish to opt-out of all marketing processes, please email opt-out@spiritstudios.ac.uk

What personal data do we collect about you?

Personal data refers to any data which relates to or identifies you as an individual. We collect personal data about you when you complete our student induction form. Further personal data may be collected from you whilst you study. We only collect the personal data necessary to perform the processes outlined below.

How will we use your personal data?

We process your personal data in a number of ways as an educator. For example, without such processing you won't be able access resources necessary for your learning and we won't be able to track your progress throughout the course to provide you with any final marks or certification. Below is a list of the processing we do, along with the lawful basis for such processing:

Processing	Description	Article 6 lawful basis
Student Induction	To collect personal data needed to perform other processing tasks.	Legitimate interests
Student ID Card Creation	All students are provided with a Student ID card to help maintain the safety of individuals and security of equipment.	Legitimate interests
Student Sign-In/Out Records	Students are required to sign-in and out when entering and leaving the premises. An account for each student is created in our sign-in system for this purpose This information is used for any fire/bomb drills and alerts. We may also use sign-in	Legitimate interests

	information to verify whether students were on the premises on a particular date and time.	
IT Network User Account and Workspace Creation	To access personal storage space and learning materials relating to your course.	Legitimate interests
G-Suite Account Creation	Students are provided with a G-Suite account to access a range of services required to complete their studies. This includes the creation of a @spiritstudios.ac.uk email account.	Legitimate interests
Spanning Backup account creation	Students are provided with a Spanning account, allowing them to see the status of their backups and to perform any restorations.	Legitimate interests
Backup of data	We backup email, files and documents, calendars, contacts and more on a daily basis	Legal Obligation
Virtual Learning Environment (VLE) account creation	To access learning materials, forums and submit assignments.	Legitimate interests
Aerohive account creation	To provide Wi-Fi access for student devices.	Consent
LibraryWorld account creation	To loan books and reading materials.	Consent
Equipment Booking System Account Creation	Students are provided with an account for our equipment booking system so they can book out equipment for studio sessions.	Legitimate interests
Studio Attendance	We keep a record of student attendance in relation to facility and equipment bookings. Penalties can be applied for late check-ins, check-outs and no-shows.	Legitimate interests
Tracking	We keep a record of all student assessment marks to provide total mark scores for each student for each module, year and at completion of the course, as well as statistical information on class, year and completion averages.	Legitimate interests
Attendance	We keep records of attendance for classes. We'll contact students if we have concerns relating to their attendance. We also create statistical information using this data, such as average module/course attendance.	Legitimate interests
Bulk Correspondence	There will be times when we contact multiple students simultaneously, such as rescheduling of a lesson, guest lectures and job opportunities. Such correspondence can be done by phone, SMS, email and post.	Legitimate interests
Finance	Student accounts are regularly processed to ensure all tuition fees have been paid.	Legitimate interests
Student welfare	Students may contact us to request advice or support during their studies.	Legitimate interests
Outstanding achievement awards	Occasionally Spirit Studios and/or academic partners recognise outstanding achievement with awards or prizes.	Legitimate interests

Student discounts	Discounts may be available to students on various hardware/software from third parties. With some discounts, Spirit Studios needs to purchase the hardware/software on the student's behalf.	Legitimate interests
Withdrawals/ Interruptions to study	Students may choose to suspend or end their studies prior to the completion of the course. This will require us to inform the academic partner, if applicable, update student records and disable/delete various accounts for security purposes.	Legitimate interests
Alumni tracking	We contact alumni for updates on their careers, as well as to provide information on job opportunities. We promote stories of student successes on our website, our social media channels and during events.	Legitimate interests
Enrolment status	We need to know that academic students are enrolled with an academic partner to ensure legitimacy of tuition.	Legitimate interests
CCTV	We operate a CCTV system that captures footage around the premises and is used to investigate reported harm to individuals and damage or theft of property.	Legitimate interests
Marketing	Students can choose whether they would like to receive marketing information on our courses and services. Such correspondence could be by phone, SMS, Email and post	Consent
Sage Account	We create an account for each student on Sage to record all payments throughout a student's studies	Legitimate interests
Bursary Payments	Bursary payments may be available for some students	Contract
Transfer of data to Academic Partners	We need to continually update academic partners on their applicable students, such as a student's study status and their grades.	Legitimate interests
Transfer of data to Accreditation Partners	Some students will be eligible for industry accreditation. For this to occur, limited data will need to be transferred to the applicable accreditation partner(s) to take exams and receive certification.	Contract
Summer School Numbers	We create a spreadsheet to manage summer school courses	Legitimate interests
Proof of Study Letter	Some students may be exempt from paying council tax. We can provide a letter on request.	Consent
Risk Assessments	We create risk assessments when required. i.e. for a field trip.	Legal Obligation
Creative Spirit Management	We occasionally run events and workshops and students will register in advance if they wish to attend. We also keep a record of attendees to previous events to analyse student engagement	Legitimate interests

Video conferencing account creation	Students are provided with a Zoom user account, allowing them to join lessons, tutorials and events remotely. Such online meetings may be recorded.	Legitimate interests
Self-service of Active Directory user account	Students can change and reset their account password, and unlock their user account by themselves using a dedicated portal.	Legitimate interests
Remote Access Technologies	Students can remotely access designated workstations, allowing them access to software and processing power from home.	Legitimate interests
Apple computer and device management Solution	We utilise JAMF to improve security and the user experience of our Apple computers and devices.	Legitimate interests

Relevant Article 6 lawful basis definitions:

Consent: the individual has given clear consent for you to process their personal data for a specific purpose.

Contract: the processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

Legal Obligation: processing is necessary for compliance with a legal obligation to which the controller is subject.

Legitimate interests: the processing is necessary for your [Spirit SSR Ltd.'s] legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Special category data

Special category data is personal data which the General Data Protection Regulation (GDPR) says is more sensitive and so needs more protection. We collect the following special category data about you.

Special category data	Article 6 lawful basis for processing personal data	Article 9 condition for processing special category data	Why we collect this special category data
Ethnicity	Consent	Explicit Consent	To monitor the performance of our Equal Opportunities Policy
Medical information	Legitimate interests	Explicit Consent	It may be necessary for us to store some of our student's medication on-site. It may also be necessary for some staff to be informed

			on student medical conditions so that they can better assist in any emergencies.
Learning difficulties and disabilities	Legitimate interests	Explicit Consent	Additional support may be available for students with learning difficulties and/or disabilities.

Relevant Article 9 conditions for processing special category data:

Explicit Consent: The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject

Details of transfers to a third country and safeguards

Update: On July 16, 2020, the European Court of Justice (ECJ) ruled that the E.U-U.S Privacy Shield Framework used by thousands of companies, including Spirit SSR Ltd, to transfer data between the E.U and U.S does not adequately protect the privacy of European citizens. Spirit Studios is in the process of moving to Standard Contractual Clauses (SCCs) for transfers of data to third countries and international organisations.


Extreme Networks (formerly Aerohive) - We utilise an Aerohive Wi-Fi network for staff, students and guests. The Aerohive network consists of a number of access points and a cloud platform for administration. Spirit Studios' dedicated account on the cloud platform is located within the EU, along with all personal data, and is accessible by technical staff.

Each student can choose whether they would like a personal Wi-Fi account during inductions. If a student chooses to do so, their First Name(s), Last Name(s), Course and Email Address will be transferred to Aerohive. Login details will then be provided to the student via email.

Spirit Studios and Extreme Networks have agreed to standard contractual clauses for the transfer of personal data from the EEA to third countries and international organisations, providing adequate safeguards with respect to protection of privacy and the fundamental rights and freedoms of individuals.

Aerohive's privacy notice can be viewed here:
<https://www.aerohive.com/legal/privacy-policy/>

Avid - Some students may be eligible to undertake industry accreditation by Avid. For this to occur, limited personal data must be transferred Avid. The data transferred to Avid is used to set up user accounts on their system so students can login and undertake exams and receive certificates. This will include First Name(s), Last Name(s), Email



Address, Course Name and Course Year/Term. This information can be stored in the U.S. The transfer of data to Avid is necessary for the performance of a contract between the student and Spirit SSR Ltd. Avid's privacy notice can be viewed here: <https://www.avid.com/legal/privacy-policy-statement>

Google (G-Suite) - Personal data, such as first name, last name and Spirit Studios email address are added to G-Suite to create each student's account. Each student can then choose to add a personal mobile phone number and/or email address as a method of recovering access to their account. Students can also choose to provide additional data, such as a profile photo.

Personal data stored in documents and spreadsheets, such as assessment tracking, attendance, bursary applications, letters for council tax exemptions and any emails sent to and/or from an @spiritstudios.ac.uk email address will also be stored in G-Suite.

Spirit Studios and Google LLC have agreed to standard contractual clauses for the transfer of personal data from the EEA to third countries and international organisations, providing adequate safeguards with respect to protection of privacy and the fundamental rights and freedoms of individuals.

Google is certified under the EU-U.S Privacy Shield Frameworks that facilitate the transfer of data outside of the EU as required by GDPR. The G-Suite privacy notice can be viewed here: https://gsuite.google.com/terms/education_privacy.html

LibraryWorld - Spirit Studios utilises LibraryWorld; a cloud-based library management platform. Spirit Studios' dedicated account on this cloud platform is in the U.S, along with all personal data.

Each student can choose whether they would like a LibraryWorld account during inductions. If a student chooses to do so, their First Name(s), Last Name(s), Campus and Spirit Studios Student ID will be transferred to LibraryWorld. LibraryWorld's privacy notice can be viewed here: <https://www.libraryworld.com/tos.html>

Spanning - Spirit Studios utilises Spanning Backup for G-Suite to backup data from our G-Suite domain. This includes Gmail, Drive (personal and Shared/Team Drives), Calendar, Contacts and Sites.

Spirit Studios and Spanning Cloud Apps have agreed to standard contractual clauses for the transfer of personal data from the EEA to third countries and international organisations, providing adequate safeguards with respect to protection of privacy and the fundamental rights and freedoms of individuals.

Spanning (under Kaseya US LLC) are certified under the EU-U.S Privacy Shield Framework to facilitate the transfer of data outside of the EU as required by GDPR. Spanning's privacy notice can be viewed here: <https://spanning.com/privacy-statement/>

Zoom - Spirit Studios utilises Zoom to facilitate online lessons, tutorials and events. Lessons and events may be recorded for rewatching and catch up purposes.

Spirit Studios and Zoom Video Communications, Inc. have agreed to standard contractual clauses for the transfer of personal data from the EEA to third countries and international organisations, providing adequate safeguards with respect to protection of privacy and the fundamental rights and freedoms of individuals.

Zoom is certified under the EU-U.S Privacy Shield Frameworks to facilitate the transfer of data outside of the EU as required by GDPR. Zoom’s privacy notice can be viewed here: https://zoom.us/privacy#_Toc44414846

JAMF

Spirit Studios utilises JAMF as an enterprise management solution for our Apple computers and devices. This provides security and improves the user experience when using such devices.

JAMF is certified under the E.U-U.S Privacy Shield Framework to facilitate the transfer of data outside of the EU as required by GDPR. JAMF’s privacy notice can be viewed here: <https://www.jamf.com/privacy/>

How long do we keep your personal data?

Academic courses

Time frame	Personal data to be deleted.
As soon as processed	Passport details where international placements/internships have been arranged Bank details in relation to bursary applications
Three months after induction	Proof of identification for enrolment
On completion/exit of course	Disable Spirit Studios user account Disable Stingray Student Portal user account
The first August following completion/exit of course	Avid ISIS workspace eSendex information Aerohive account LibraryWorld account Student ID card information Studio Attendance Zoom Account
The second August following completion/exit of course	Emergency Contact Name Emergency Contact Relationship Emergency Contact Mobile no Emergency Contact Tel no Emergency Contact Address Emergency contact postcode Medical Information Learning Difficulties and Disabilities Sign-in system activity

The fourth August following completion/exit of course	<ul style="list-style-type: none"> Spirit Studios user account Spirit Studios user account self-service data Remote desktop technology user data G-Suite user account Spanning user account VLE account Archive of Stingray account Archive of equipment booking system account Student File (physical) Student submissions (physical) Attendance Student letters/correspondence Data transferred to academic partners Withdrawal information, if applicable Student welfare Bursary application Risk Assessments Event Management Student discount processing documents
The sixth August following completion/exit of course	<ul style="list-style-type: none"> Student financial and funding records shared by Academic partners

Industry courses (and short, online courses where applicable)

Time frame	Personal data to be deleted
As soon as processed	<ul style="list-style-type: none"> Passport details where international placements/internships have been arranged
One month after induction	<ul style="list-style-type: none"> Proof of Identification for enrolment
On completion/exit of course	<ul style="list-style-type: none"> Disable Spirit Studios user account Disable Stingray Student Portal user account
The first August following completion/exit of course	<ul style="list-style-type: none"> Avid ISIS workspace Esendex information Aerohive account LibraryWorld account Student ID card information Studio Attendance Zoom Account Emergency Contact Name Emergency Contact Relationship Emergency Contact Mobile no Emergency Contact Tel no Emergency Contact Address Emergency contact postcode Medical Information Learning Difficulties and Disabilities Bank Details (where they have been provided) Spirit Studios user account Spirit Studios user account self-service data Remote desktop technology user data

	G-Suite Account Spanning user account Sign-in system activity Student File (physical) Student submissions (physical) Attendance VLE account Archive of Stingray account Archive of equipment booking system account Student letters/correspondence stored on Admin Drive Withdrawal information, if applicable Student welfare Student discount processing documents
The sixth August following completion/exit of course	Student financial and funding records

CCTV footage is kept for up to 30 days.

Log entries older than three months are automatically deleted in JAMF.

All other information is kept indefinitely. Archiving of Stingray accounts allows us to fulfil our duty of care to alumni. This includes providing them with job references, details on their qualifications and job opportunities. Personal data is also kept for purposes of statistical analysis. Students have the right to erasure for any data that was provided consensually, such as gender and ethnicity.

Personal data transferred to accreditation partners is left with them indefinitely. Spirit Studios assumes the students would like to retain their certification and access to the various systems for future certification.


Your rights

Right to be informed – This privacy notice outlines how we process your personal data.

Right of access – You have the right to obtain confirmation that your personal data is being processed by us, as well as request a copy of the personal data we have on you. We may make a small charge for requests that are considered unfounded or excessive.

Right to rectification - We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

Right to erasure – You can request that the deletion or removal of personal data where there is no compelling reason for its continued processing.



Right to restrict processing – You have the right to block the processing of personal data under certain circumstances. This would allow us to continue to store your personal data but not further process it.

Right to data portability – You have the right to obtain and reuse the personal data we store on you for your own purposes across different services.

Right to object – You have the right to object to us processing your personal data for direct marketing and we will stop such processing when we receive an objection from you.

You also have the right to object to processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority. You must have an objection on grounds relating to your particular situation. We will stop such processing unless we can demonstrate legitimate grounds for the processing, or that the processing is for the establishment, exercise or defence of legal claims.

Rights related to automated decision making – We do not process any of your personal data with any wholly automated decision-making systems, nor do we carry out any profiling.

Children’s personal data

Consent needs to be obtained from a parent or guardian to process the personal data of a child aged 16 or under for any information society service or for the purposes of marketing.

Changes to our privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated in August 2020.

Supervisory Authority

If you believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner’s Office (ICO): <https://ico.org.uk>