

Service Provider Privacy Notice

1. Introduction

London Business School (the **School**), whose main campus is located at Regent's Park, London, NW1 4SA, is a registered data controller with registration number Z8182937. The School collects and uses personal data about certain service providers in accordance with the data protection principles set down in UK and European Data Protection Laws.

This privacy notice outlines what you can expect when the School collects your information if you have a temporary or ongoing relationship with the School because you are engaged to provide services.

2. What personal data do we collect about you?

Personal Data means any information, which can directly or indirectly identify a person. For the purpose of your contract for services, this includes:

- your name, date of birth, address and contact details, including email address and telephone number;
- CVs and/or applications that include details of your qualifications, skills, experience and employment history;
- pre-appointment screening details, references and meeting notes;
- information about your entitlement to work in the UK
- whether or not you have a disability for which the organisation needs to make reasonable adjustments
- photographs and video including CCTV images;
- letters of offer and acceptance of contracts for services and subsequent amendments;
- information needed for payment purposes;
- rate of pay per point for teaching services;
- contacts and emergency contact information;
- correspondence with or about you, for example letters to you about your rate of pay or at your request, a letter to support a visa application or permitted paid engagement
- information needed for equal opportunities monitoring policy
- records relating to your service history, such as reviews and teaching evaluations ;
- and, where appropriate, records of grievances or student complaints
- Location data, IT network usage, and phone records which are collected automatically via the School's IT network.

3. How is your personal data used?

Your data will be used primarily by London Business School in the administration of your contract. As a general rule, London Business School collects personal information directly from you, but some may come from internal sources, such as employees of the School that you liaise with, or in some cases, external sources. In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you or implied from your actions).

You will, of course, inevitably be referred to in London Business School documents and records that are produced by you and your colleagues in the course of providing your services and the business of the School. You should refer to the School Data Protection Policy which is available on portal.

4. Why do we collect personal data?

London Business School needs to keep and process information about you for normal contractual purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable both the School to operate and also manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your contract ends and after it has ended. This includes using information to enable us to comply with the contract for services, to comply with any legal requirements, pursue the legitimate interests of the School and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

The personal information collected is used and disclosed for our business purposes, including establishing, managing or terminating your contract with London Business School. Such uses include:

- determining eligibility for initial appointment, including the verification of references and qualifications;
- administering payment;
- establishing training and/or development requirements;
- conducting contract reviews and determining performance requirements;
- assessing qualifications for a particular job or task;
- gathering evidence for LBS procedural investigations;
- establishing a contact point in the event of an emergency (such as next of kin);
- complying with applicable contract law;

If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

5. What about special categories of Personal Data?

London Business School may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor inclusion and diversity statistics. We may also collect information about whether or not service providers are disabled to make reasonable adjustments for those who have a disability. We process such information to carry out our obligations and exercise specific legal rights in relation to employment.

Where we process special categories of information relating to your racial or ethnic origin, religious belief, biometric data, gender identity or sexual orientation we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

6. Sharing and disclosing your personal information

The School may disclose certain personal data to external bodies as categorised below. At all times, the amount of information disclosed and the manner in which it is disclosed will be in accordance with the provisions and obligations of Data Protection laws. Please note this is not an exhaustive list.

Disclosure to	Details
Home Office, UK Visas and Immigration	In order to fulfil the School's obligations as a visa sponsor
Disclosure and Barring Service (DBS)	Required to assess an applicant's suitability for positions of trust.
UK agencies with duties relating to the prevention and detection of crime, apprehension and prosecution of offender, collection of a tax or duty, or safeguarding national security	As necessary, and with appropriate consideration of your rights and freedoms (such as Benefit or Tax Inspectors, the Police, UK Visas and Immigration, or the Foreign and Commonwealth Office).
Financial Times	Faculty information is provided to the Financial Times for international rankings purposes.
Accreditation Agencies	Faculty information is provided to School accreditation agencies as part of our accreditation requirements.
Third party software suppliers	Where external computer systems are required to facilitate the purposes listed in section 3, data may be shared with software suppliers. Any such transfer will be subject to a formal agreement between the University and those suppliers, to ensure protection of your personal data. Example: systems underpinning authentication to Library subscription databases.
Office for Students (OfS) and Quality Assurance Agency (QAA)	OfS are the schools official regulator for higher education with the QAA to carry out quality and standards assessments.

7. Other disclosures to third parties

The School may, from time to time, need to make other disclosures of your personal information without your consent but any such disclosures will be made in accordance with the obligations imposed on the School by Data Protection laws and other relevant legislation, and with due consideration of your rights.

8. International Data Transfers

In limited and necessary circumstances, your information may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements.

In these circumstances, your personal data will only be transferred on one of the following bases:

- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by the GDPR (for example, standard data protection clauses adopted by the European Commission); or
- there exists another situation where the transfer is permitted under applicable law (for example, where we have your explicit consent).

9. How long will you keep my data?

We adhere to the Business Classification Scheme (BCS) and Records Retention Schedule (RRS) for Higher Education Providers published by JISC. These documents provide sector wide guidance covering statutory or recommended retention periods for the records produced by each activity. Further details are available from the Dean's Office.

10. Legal basis for processing your data?

In most cases, our legal basis for processing your personal information will be one of the following:

- To fulfil our contractual obligations to you in connection with your contract for services; failure to provide this information may mean that we cannot fulfil our obligations under our contract with you;
- To comply with our legal obligations, for example obtaining proof of your right to work status to enable us to meet relevant obligations;
- To comply with our legal obligations to you, for example health and safety obligations that we must comply with as your employer, or to a third party (e.g. the Health and Safety Executive);
- To meet our legitimate interests including our commercial interests, for example to manage the provision of teaching effectively, for budgeting, forecasting, and resource distribution, and to protect us against theft or other crime;
- To protect your or another person's vital interests, for example by providing contact details to the Police in the case of an emergency.

11. What rights do I have?

Under Data Protection laws, you have the following rights in relation to our processing of your personal data. Please note that these rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us to erase your personal data in certain circumstances;
- to require us to restrict our data processing activities in certain circumstances;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on you;
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and
- where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.

Note: If you have given your consent and you wish to withdraw it, please contact dpo@london.edu. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to comply with our contractual obligations towards you, where compliance relies on the provision of certain personal data.

Please contact dpo@london.edu should you wish to exercise any of these rights. If you believe that London Business School has not complied with your data protection rights, you can contact the Information Commissioner (ICO):

The Information Commissioner's Office

Wycliffe House, Water Lane
Wilmslow, Cheshire, SK9 5AF
United Kingdom
Tel: +44 (0)303 123 1113 (local rate)
Email: www.ico.org.uk/global/contact-us/email/
Web: www.ico.org.uk

12. Automated Decisions about you

We do not automatically process your personal information to make decisions or conduct 'profiling' about you.

13. Updating this Privacy Notice

We may update or amend this Privacy Notice from time to time, to comply with law or to meet our changing business requirements. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. Any updates or amendments will be posted on the Website. By continuing to access the Website, you will be subject to these updates and amendments