

PRIVACY STATEMENT

Welcome to the Architectural Association Inc's privacy statement.

The Architectural Association or 'AA' respects your privacy and is committed to protecting your personal data. This privacy statement will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how the AA collects and processes your personal data including any data you may provide when you sign up for communications through our communications preference centre, purchase our products and publications or take part in an event.

It is important that you read this privacy notice together with our <u>Cookies Policy</u> and the privacy fair processing notices for the <u>school</u>, <u>membership</u> and <u>development</u> as appropriate.

Controller

The AA is the data controller and responsible for your personal data. We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy statement, including any requests to exercise your legal rights (see below), please contact the DPO using the details set out below.

Email: dataprotection@aaschool.ac.uk

Postal address: 36 Bedford Square, London WC1B 3ES

Telephone number: 020 7887 4047

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (https://ico.org.uk/). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Details of the data we collect, use, store and transfer about you can be found in the relevant fair processing notices for <u>school</u>, <u>membership</u> and <u>development</u> and may include:

- first name, last name, title, date of birth and gender.
- postal address, email address and telephone numbers.
- details about payments to and from you and other details of products and services you have purchased from us.
- your preferences in receiving marketing from us and your communication preferences.
- We may receive personal data about you from various third parties and public sources including:
 - (a) Analytics providers which provide details including internet protocol (IP) addresses, browsing patterns, browser type and other technology on the devices you use to access this website (see <u>Cookies Policy</u> for more information)
 - (b) Identity and Contact Data from publicly availably sources such as Companies House and the Electoral Register (see <u>Development Fair Processing Notice</u> for more information).

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for membership;
- apply for courses;
- create an account on our website;
- subscribe to our publications; or
- request marketing to be sent to you.

Automated technologies or interactions. As you interact with our website, our third party analytics provider(s) may collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies (see <u>Cookies Policy</u> for more information).

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you (for example to provide your membership benefits).
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (for example to create your membership number which helps us administer your membership account)
- Where we need to comply with a legal or regulatory obligation.
- Where we have your consent (for example to send you marketing communications)

Purposes for which we will use your personal data

Details of how we use your personal data can be found in the <u>school</u>, <u>membership</u> and <u>development</u> <u>fair processing notices</u>.

Opting out

You can ask us to stop sending you marketing messages at any time by logging into the preference centre and checking or unchecking relevant boxes to adjust your marketing preferences or by using the unsubscribe option contained in all our marketing emails.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. **Disclosures of your personal data**

We may have to share your personal data with the third parties set in the <u>school</u>, <u>membership</u> and <u>development</u> fair processing notices.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

There are limited circumstances under which we may transfer personal data outside of the EEA for example when using PayPal for payments which is a US company or where personal data of AA Visiting School students is transferred to Visiting Schools outside the EEA (where data is only accessible only by AA staff).

If it should be necessary to transfer your personal data outside the EEA which have not been deemed to provide an adequate level of protection for personal data by the European Commission we will ensure the data is transferred under the terms of specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. **Data retention**

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. Your legal rights

You have the right to:

- Request Access to your personal date (see data subject access request below)
- Request correction of the personal data that we hold about you.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data.
- Object to processing of your personal data where we are relying on a legitimate interest
- Request restriction of processing of your personal data
- Request the transfer of your personal data to you or to a third party.
- Withdraw consent at any time where we are relying on consent to process your personal data.

Further information about your legal rights can be found on the <u>Information Commissioners Office</u> website

Subject Access Requests

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

If you wish to request access to the personal data we hold about you please contact the Data Protection Officer as follows:

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Postal address: 36 Bedford Square, London WC1B 3ES

Telephone number: 020 7887 4047