



# Beyond the Frame Competition Privacy Notice

## Introduction

Throughout this privacy notice, "University" "we", "our" and "us" refers to the Norwich University of the Arts. "You" and "your" refers to the applicant for Beyond the Frame (BTF) competition.

Norwich University of the Arts is a registered data controller. We collect, hold and process personal information relating to your enquiries. This is essential for us to carry out your request for services and functions, and to manage our operations. We hold personal information and comply with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA).

This privacy notice applies to any person who has applied to enter the Beyond the Frame competition.

You may also want to read other Norwich University of the Arts privacy notices. If you use our website, please read the website privacy notice. We do our utmost to protect your privacy. As such we have security systems and procedures to protect information from unauthorised disclosure, misuse, or destruction.

## What types of information we hold about you

When you apply to enter the competition, the personal information that we will collect includes your name, date of birth and contact details and, if you are under 13 years old, the name and contact details of your parent or guardian. The information collected also includes the institute where you are studying. We also ask for some information which is classed as 'special category personal data' this being your nationality and your country of domicile.

## How and why we collect this information

We collect personal information from you to be able to process your application for the competition.

The University complies with the provisions of the Data Protection Act 2018 which sits alongside the UK General Data Protection Regulation (UK GDPR). Article 6 of the UK GDPR defines six different lawful grounds for an organisation to be permitted to process personal data, and the University is legally obliged to determine and advise you of under which of the legal bases your personal data is processed. We rely on consent from you, or your parent/guardian where you are under 13 years old, under Article 6(1)(a), as our legal basis and it is important to note that you have the right to withdraw that consent at any time.

Information about your nationality and country of domicile is useful to the University as it helps us to measure the reach of the competition, helps us make sure we are being inclusive, and lets us see how we can improve our communications internationally. The University has to identify an appropriate lawful condition under Article 9 of the UK GDPR which is Article 9(2)(a) 'explicit consent'.

## How we use your information

The University uses your information in a number of ways. These may include;

- Crediting your work on the BTF website and BTF exhibition.
- Carrying out the functions and managing the operations of the BTF competition.
- Promoting and publicising the University and this competition.

## Automated Decision Making and Profiling

As part of our commitment to protecting your personal data, we want to inform you that the University currently limits the use of automated decision-making and profiling in line with the requirements of the UK GDPR. However, as we continue to develop our services, there may be instances in the future where automated processes are used to make decisions or create profiles. Should this occur, we will ensure that appropriate safeguards are in place and will always ensure that human intervention is involved when decisions are made that impact you.

## Who we might share your information with

Your competition entry will be shared and credited with your name with BTF competition judges and shortlisted entries with sponsors. We may also share with third parties engaged by the University to launch on the internet, and to carry out the functions and manage the operations of the BTF competition.

## How long we keep your information

We will keep your personal information only as long as is necessary to fulfil the purpose for which it was collected. This means that, we may display, reproduce and publish in any media, any entry, until one year after the closing date, for the sole purpose of promoting and publicising Norwich University of the Arts and this competition. We also may display all the shortlisted images on the competition website and archive for an indefinite period unless the entrant requests otherwise in writing to [info@norwichuni.ac.uk](mailto:info@norwichuni.ac.uk).

## International Transfers

### International Data Transfers

We may transfer your personal data to countries outside the UK (third countries), including countries within the European Economic Area (EEA) and beyond, where our third-party service providers or affiliated organizations are based. Such transfers may involve countries that do not have data protection laws equivalent to those in the UK.

When transferring personal data to a third country, we take steps to ensure that your data is protected in line with the UK General Data Protection Regulation (UK GDPR). These measures include the use of the following safeguards, where appropriate:

1. **Standard Contractual Clauses (SCCs):** For transfers to third countries that do not provide an adequate level of data protection, we implement the European Commission's Standard Contractual Clauses (SCCs) or equivalent contractual mechanisms as approved by the UK Information Commissioner's Office (ICO). These clauses legally bind the recipient of the personal

data to ensure that your data is processed in accordance with the standards set out by the UK GDPR.

2. **Adequacy Decisions:** Where applicable, we may transfer your personal data to a third country that has been recognised by the UK government as providing an adequate level of data protection. In such cases, no further safeguards are required, and the transfer will be made in compliance with the UK's adequacy regulations.
3. **Additional Safeguards:** In some cases, additional measures may be taken, such as encryption, pseudonymisation, or other technical and organisational safeguards, to further protect your personal data during the transfer process.
4. **Transfers to Internal Organizations:** Your personal data may also be transferred to other entities within our university group or related organizations, including those based outside the UK, to support internal administrative functions, academic services, or research purposes. Any such transfers will be governed by appropriate safeguards, including but not limited to SCCs or other legally recognised measures under the UK GDPR.

We will ensure that any data transfer to third countries is carried out with appropriate legal protections in place, and we will provide you with further information upon request regarding the specific safeguards applied in relation to your data.

## Your rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information (this is known as a Subject Access Request or SAR).
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate or incomplete. If you wish to correct any information we hold about you, please contact [info@norwichuni.ac.uk](mailto:info@norwichuni.ac.uk) in the first instance.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact our Data Protection Officer (Chris Dubinski) at [dataprotection@norwichuni.ac.uk](mailto:dataprotection@norwichuni.ac.uk) if you wish to make a request or have any queries.

If you believe your data has been breached, please speak to the University. The [Information Commissioners website](#) provides more information on data breach rights.

## How to contact us

If you require further information or have any concerns about how your personal information is held and processed by us, please email the University's Data Protection Officer (Chris Dubinski) at [dataprotection@norwichuni.ac.uk](mailto:dataprotection@norwichuni.ac.uk) or write to us at Data Protection Officer, Norwich University of the Arts, Francis House, 3 -7 Redwell St, Norwich NR2 4SN.

You can also complain to the ICO if you are unhappy with how we have used your data.  
Information Commissioner's Office

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

ICO Helpline number: 0303 123 1113  
ICO website: <https://www.ico.org.uk>

## Changes to this privacy notice

We keep our privacy notices under regular review.

This privacy notice was last updated April 2025.