

## **Confetti Media Group Privacy Notice – for Employees, Workers and Contractors**

### **Introduction**

Confetti College (part of Nottingham Trent University) is committed to protecting the privacy and security of your personal information and strictly adhere to the rules laid out by the UK General Data Protection Regulation (UK GDPR), Data Protection Act of 2018 and Data Use and Access Act of 2025. This Privacy Notice provides important information about how Confetti College (CC) and its associated entities (“Confetti”, “we”, or “us”), which includes Nova Centric Ltd; and Nottingham Trent University (“NTU”), identifies and manages its Data Protection responsibilities in accordance with its legal and regulatory obligations. CC is wholly owned by NTU, and as such NTU’s Privacy Notice has been adopted, with additions to reflect local business practice.

Confetti encourage you to review the privacy statements of any websites you choose to navigate to from our website (or navigate from to our website) or digital services that we provide links to, so that you can understand how those websites collect, use and share your information as well. Any third-party sites that you can access through the website are not covered by this Privacy Notice and we accept no responsibility or liability for these sites.

### **Who we are**

Confetti is a “data controller” which means we are responsible for deciding how we hold and use personal information about you.

This Privacy Notice applies to all Confetti staff, including current and former employees, workers, contractors and candidates for recruitment (“you” or “your”) or services that link to it (collectively, our “Services”). Occasionally, a Service will link to a different Privacy Statement that will outline the particular privacy practices of that Service (e.g. Access Creative, for further education students; Nottingham Trent University Students, for higher education students; website and cookies).

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

Data Protection Services to Confetti are provided by NTU’s data protection team. The Data Protection Officer can be contacted by the details below:

Attn: Data Protection Officer  
Nottingham Trent University  
50 Shakespeare Street  
Nottingham  
NG1 4FQ  
Email: [DPO@ntu.ac.uk](mailto:DPO@ntu.ac.uk)

We may need to update this Privacy Notice from time to time. If changes made to this Privacy Notice are considered to be material, we will notify you of the changes. This Policy was last updated on 19 September 2025.

### **Personal information**

Confetti 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 provide 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 about the use of your information, and we encourage you to contact us at any time with questions or concerns.

### **The types of personal information we collect**

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

- Name, address, phone number, date of birth, gender;
- National Insurance Number, Passports, Driving Licence and driving history;
- Right to work documentation (visas and other immigration data);
- Requests for special arrangements;
- Family details, such as next of kin and emergency contact information;
- Your position, role, contract terms, salary, benefits and entitlements;
- Your financial details, including bank account numbers, sort codes, NI numbers, tax codes, payslips;
- References, qualifications, recruitment and training and development records;
- Communications relating to decisions we make;
- Pensions data;
- Performance, promotion and progression data;
- Grievance and disciplinary investigations/proceedings;
- Visual images / photographs (including CCTV);
- Computing and email information including login details, network access.

In some circumstances, we may, during the course of your employment with us, also collect, store and use the following the "special categories" of more sensitive personal information which may include (but are not limited to):

- Trade union membership;
- Information about your race, ethnicity, religious or similar beliefs, political beliefs, sexual orientation and equality monitoring data;
- Information about your health, including medical conditions that you have notified to us, disability, decisions and consideration of reasonable adjustments, and sickness absence records; and
- Details of any relevant criminal convictions we have asked you to declare.

We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations and to comply with employment, health and safety, and other laws;
- Where it is needed in the public interest, such as for equal opportunities monitoring and reporting or to carry out Criminal Record background checks;
- Where it is needed to assess your working capacity on health grounds and provide appropriate workplace adjustments, subject to appropriate confidentiality safeguards;
- To manage leaves of absence, sickness absence and administer benefits;
- Where the processing is necessary for archiving purposes in the public interest, or for scientific or historical research purposes, or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law.

We will identify Article 9 exception under UK GDPR and DPA 2018's Schedule 1 when processing special categories of data

We may also use your personal and sensitive personal information where this is necessary to protect your vital interests, or someone else's vital interests, typically in an emergency. In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you and/or we may be prevented from complying with our legal obligations. This may affect your employment status with Confetti, for example, if you fail to provide copies of your passport and right to work visa or financial data including bank account and sort code for us to pay you.

You have a contractual duty to inform us of any conflicts of interest that may affect your role and decision making at Confetti.

### **How we collect your data**

We typically collect personal information about employees, workers and contractors through the application and recruitment process, either directly from candidates or through an employment agency or background check provider (including your previous educational establishments and/or former employers if they provide references to us).

Not all the personal information Confetti holds about you will always come directly from you. We may collect personal information from third parties such as our partners, service providers, and publicly available websites, to assist Services and facilitate business operations that help us maintain data accuracy and provide and enhance our Services.

We will collect additional personal information in the course of job related activities throughout the period of you working for us.

Our servers, logs, and other technologies automatically collect certain information to help us administer, protect, and improve our Services; analyse usage; and improve users' experience.

Confetti uses CCTV around campus, and will collect and store information. For full details of our CCTV use, please refer to our CCTV Policy.

### **Lawful Basis Of Processing Information**

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where:

- The data subject (you) has given consent to the processing activity taking place.
- If the processing is necessary for the performance of a contract
- If the processing is necessary for compliance with a legal obligation to which the controller is subject
- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners.
- If the processing is necessary for the purpose of recognised legitimate interest
- If processing is to fulfil vital interest

Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:

**The purpose test** – to identify the legitimate interest

**Necessity test** – to consider if the processing is necessary for the purpose identified

**Balancing test** – considering the individual's interests, rights or freedoms and whether these override the legitimate interests identified.

However, where processing is based on recognised legitimate interest, we would not conduct a balancing exercise of legitimate interest assessment

### **How we use data about you**

We use your personal information for the following purposes:

- To carry out our obligations under your employment contract with us;
- To administer your employee file, including paying you and providing any benefits or schemes (e.g. healthcare, pension);
- To allow you to use business tools (e.g. email, cloud based services)
- To provide information about your employment, and allow you to participate in interactive features of our Service, when you choose to do so;
- To monitor and support your professional development and annual appraisal review;
- To manage your leave from work (e.g. holidays, sickness absence);
- To assess your fitness to work and/or legal entitlement to work in the UK;
- To allow financial transactions to and from us, including payments for Services and expenses, to ensure safe and legal transfer of currency and information;
- To ensure we meet our statutory obligations, including those related to diversity, equal opportunity and management statistics;
- To allow us to complete statutory and regulatory data returns for HESA and OfS (where required);
- To enable the development of a comprehensive picture of the workforce;
- To ensure compliance with the Prevent Duty under the Counter Terrorism & Security Act 2015;
- For the maintenance of our financial accounts;

### **Who we share your data with**

Confetti 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 it is necessary to administer the working relationship with you or 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 Confetti: We provide data to a variety of Confetti teams and functions, and personal information will be made available to them where necessary for the provision of Services or technical support.
- We may provide personal data to Nottingham Trent University (our parent organisation) in order to provide you with access to relevant systems, benefits, training etc. and for reporting and monitoring purposes.
- We share data with our
- Our business partners: We occasionally partner with other organisations to deliver services. This includes but is not limited to: My HR Hub, who provide HR professional services to Confetti Staff.
- Awarding and accredited bodies.

- 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; or fraud.
- We are required to share your information within data returns to HMRC and Pension providers.
- Our benefit suppliers: We are required to share your information within data returns to deliver employee benefits.
- We process personal information with a range of regulatory and statutory bodies, in fulfilling our public and legal obligations which includes with the Home Office to fulfil Confetti's obligations as a visa sponsor.
- 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.

### **How long we keep your data for**

We will not store your personal information for longer than is necessary. Confetti will ensure that our trusted partners and selected third parties with whom we share your personal information in accordance with this Privacy Notice will delete your personal information when they no longer require it.

In determining data retention periods, Confetti takes into consideration local laws, contractual obligations, and the expectations and requirements of our data subjects. When we no longer need personal information, we securely delete or destroy it. Full details can be found in our data retention schedule.

### **How we secure your data**

We have appropriate security measures in place 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 information to those employees, agents, contractors and other third parties who have a business requirement to know.

Confetti takes data security seriously, and we use appropriate technologies and procedures to protect personal information. For example:

- Policies and procedures – measures are in place to protect against accidental loss and unauthorised access, use, destruction, or disclosure of data.
- Business Continuity and Disaster Recovery strategies that are designed to safeguard the continuity of our service and to protect our people and assets.
- Appropriate restrictions on access to personal information.
- Monitoring and physical measures, to store and transfer data securely.
- Data Privacy Impact Assessments (DPIA) in accordance with legal requirements and our business policies.
- Periodic training on privacy, information security, and other related subjects for employees and contractors.
- Vendor risk management.
- Contracts and security reviews on third-party vendors and providers of services.

### **How we keep your data secure in other countries**

Your personal information may be transferred by us or our trusted partners outside of the European Economic Area (the "EEA"). Confetti has networks, databases, servers, systems,

and support located throughout the world. Confetti collaborates with third parties such as cloud hosting services, suppliers, and technology support located around the world to serve the needs of Confetti, workforce, and students.

We take appropriate steps to ensure that personal information is processed, secured, and transferred according to applicable law. In some cases, we may need to disclose or transfer your personal information within Confetti or to third parties in areas outside the UK. The areas in which these recipients are located will vary from time to time, but may include the United States, Europe, Canada, Asia, Australia, India, and other countries.

When we transfer personal information from the European Economic Area (EEA) OR United Kingdom (UK) to other countries in which applicable laws do not offer the same level of data privacy protection as in the EU/UK, we take measures to provide an appropriate level of data privacy protection. They are :

International Data Transfer Agreement

EU Standard Contractual Clauses + UK Addendum

Binding Corporate Rules

An exception as defined in Article 49 of the EU GDPR

In other words, your rights and protection remain with your data, i.e. we use approved contractual clauses, multiparty data transfer agreements, and other measures designed to ensure that the recipients of your personal information protect it.

### **Your rights**

We respect your right to access and control your information, and we will respond to requests for information and, where applicable, will correct, amend, or delete your personal information.

Under certain circumstances, by law you have the right to:

- **The right to be informed:** We are required, to provide clear and transparent information to you about how we process your personal data. This privacy notice addresses this right
- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of personal information that we hold about you. This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- **Request erasure** of your personal information in limited circumstances. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are processing your personal information on the basis of our legitimate interest (or that of a third party) or consent and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes

- **Request the restriction or suspension of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it. This means we will still hold it but not process it. This is a conditional right which may only be exercised when:
  - Processing is unlawful
  - We no longer need the personal data, but it is required for a legal process
  - You have exercised your right to object to processing and require processing to be halted while a decision on the request to object is made.
  - If you are exercising your right to rectification
  
- **Object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
  
- **Object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.
  
- **Right to Data Portability** of your personal information to another party. You can request that your personal data is transferred to another controller or processor in a machine-readable format if:
  - Processing is based on consent
  - Processing is by automated means (i.e. not paper based)
  - Processing is necessary for the fulfilment of a contractual obligation

### **How to contact us**

Please contact our Data Protection Officer with any requests related to your personal information – [DPO@ntu.ac.uk](mailto:DPO@ntu.ac.uk)

If you are not satisfied with how Confetti manages your personal data please contact the Data Protection Officer. In addition you have the right to make a complaint to a data protection regulator. The ICO contact details are:

#### **Post:**

Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**Website:** [Click Here](#)

**Email:** [Click Here](#)

**Phone:** 0303 123 1113