

SWTA Privacy Policy

Samantha Wood Theatre Academy
Effective Date: 25.05.2018
Revised: 11.02.2020
Revision Number: v1.2



INTRODUCTION

Samantha Wood Theatre Academy (SWTA) is committed to protecting your privacy and security, whether a parent or person with parental responsibility, or a child. We aim to be transparent and raise awareness of both children and parents to your rights and freedoms relating to data protection and safeguards. When we refer to a child we mean anyone under the age of 18.

We are not only committed to providing a safe environment for all our students and customers, but also for teachers, casual and freelance workers and everybody who comes into contact with us, both physically and virtually (online).

This Privacy Statement applies to the use and processing of personal information provided by you and collected by SWTA, e.g. via our online registration process, Customer Portal, telephone, email exchange, letters or other correspondence; and used in accordance with the requirements of the General Data Protection Regulation 2018 (GDPR).

Please read this Privacy Statement carefully, should you have any queries in respect of this statement or our use of personal data, please contact our data protection officer Samantha Wood here:
Samanthawoodtheatreacademy@hotmail.com

SWTA GDPR POLICY

GDPR stands for General Data Protection Regulation and replaces the previous Data Protection Directives that were in place. It was approved by the EU Parliament in 2016 and came into effect on 25th May 2018.

GENERAL DATA PROTECTION REGULATION POLICY STATEMENT

GDPR states that personal data should be 'processed fairly & lawfully' and 'collected for specified, explicit and legitimate purposes' and that an individual's data is not processed without their knowledge and are only processed with their 'explicit' consent. GDPR covers personal data relating to individuals.

The Data Protection Act gives individuals, including children of all ages, the right to know what information is held about them. It provides a framework to ensure that personal information is handled properly.

SWTA is registered with the ICO (Information Commissioners Office) under registration reference:
ZA383559

DATA PROTECTION PRINCIPLES

The legislation sets out various data protection principles. These state that personal information should be:

- Used fairly and lawfully.
- Used for limited, specifically stated purposes.
- Used in a way that is adequate, relevant and not excessive.
- Accurate.
- Kept for no longer than is absolutely necessary.
- Kept safe and secure.
- Not transferred outside the European economic area without adequate protection.

GDPR INCLUDES 7 RIGHTS FOR THE INDIVIDUAL:

1) THE RIGHT TO BE INFORMED

SWTA aims to provide total transparency over how personal data is collected, stored, managed, protected and processed.

2) THE RIGHT OF ACCESS

At any point an individual can make a request relating to their data and SWTA will need to provide a response (within 1 month). SWTA can refuse a request if we have a lawful obligation to retain data, but we will inform the individual of the reasons for the rejection. The individual will have the right to complain to the ICO if they are not happy with the decision.

3) THE RIGHT TO ERASURE

You have the right to request the deletion of your data where there is no compelling reason for its continued use. However, SWTA has a legal duty to keep children's and parent's details for a reasonable time in line with business operating requirements. This data is archived securely onsite and shredded after the legal retention period.

4) THE RIGHT TO RESTRICT PROCESSING

Parents, visitors and staff can object to SWTA processing their data. This means that records can be stored but must not be used in any way, for example reports or for communications.

5) THE RIGHT TO DATA PORTABILITY

SWTA requires data to be transferred from one IT system to another; such as from SWTA to the Local Authority for performance BOPA licences. These recipients use secure file transfer systems and have their own policies and procedures in place in relation to GDPR.

6) THE RIGHT TO OBJECT

Parents, visitors and staff can object to their data being used for certain activities like marketing or research.

7) THE RIGHT NOT TO BE SUBJECT TO AUTOMATED DECISION-MAKING INCLUDING PROFILING

Automated decisions and profiling are used for marketing based organisations. **SWTA does not use personal data for such purposes.**

LEGAL OBLIGATION

We may disclose your information to governmental agencies or entities, regulatory authorities, or other persons in line with any applicable law, regulations, court order or official request.

WHAT INFORMATION DOES SWTA HOLD?

The legislation requires that there is a clear legal basis for processing personal information.

In general, SWTA relies on the individual's consent in order to process their data. SWTA does **NOT** share your personal information with third parties, unless clearly stated. We do **NOT** sell your data, and neither do we buy data from third parties.

SWTA is required to collect and manage certain data in order to operate efficiently. We collect information about you from various sources, for example information you send directly to us via our online registration process, Customer Portal, consent forms, emails, telephone conversations and our website contact forms.

We need to know student's/parent's names, addresses, telephone numbers, email addresses and on rare occasions, financial information (e.g. to issue refunds via BACS – this information is deleted on completion of the transaction). We also require a child's date of birth, their school of education, along with any medical issues that teachers need to be aware of.

We are required to collect certain details of visitors and chaperones to our dance school, e.g. names, telephone numbers, and where appropriate, company name. This is in respect of our Safeguarding Policy.

Although our teachers are freelance, SWTA is required to hold certain data relating to their names, addresses, email addresses, telephone numbers, date of birth and in some cases, photographic ID such as passport and driver's license, bank details. This information is also required for Disclosure and Barring Service checks (DBS).

When you participate in, or sign up to any SWTA show, activity or workshop, we may collect and store additional personal information, such as costume sizes.

By submitting your details, you enable us to provide you with the products or services that you have selected or signed up to and all relevant information relating to the same.

When taking photographs of students in class or filming performances, SWTA ask for student/parental permission. SWTA may use these images and any reproductions or adaptations of the images for publicity, celebrating achievements, or other purposes to help achieve our goals. This might include (but is not limited to) the right to use them in printed and online publicity (our website), social media (our Facebook and Instagram accounts), press releases and funding applications (please see our 'Photography and Filming Policy' for more details).

HOW WILL WE USE YOUR PERSONAL INFORMATION?

We will use your personal information for a number of purposes including:

- Creating and managing your customer account.
- Providing you with information about our services, uniform and activities; and to deal with your requests and enquiries, including complaints.
- To send you information you requested when you voluntarily contacted us.
- For "service administration purposes", which means that we may contact you for reasons related to the service or activity you signed up for (e.g. change of details regarding a class you attend, fee invoices, etc.).
- To provide information relating to events, competitions, shows.
- Enforce our Terms and Conditions and otherwise manage our business.

- To send you relevant communications regarding payment of fees and changes to classes or new classes.
- Information is sent via a secure file transfer system to DDC for the processing of DBS checks. Copies of teacher's DBS certificates are held on a central staffing record and are shared with the respective schools in which the teachers work, for safeguarding purposes.
- Data portability - SWTA requires data to be transferred from one IT system to another, for example: from SWTA to the Local Authority (for performance licenses, such as Body Of Persons Approval - BOPA), and dance associations (for examinations). These recipients use secure file transfer systems and have their own policies and procedures in place in relation to GDPR.
- Staff appointments.

This list is representative and not exhaustive. As and when we need to use your personal information for reasons other than the ones specified above, we will ensure that we provide you with reasonable notice first. You will be given the opportunity to withhold or withdraw your consent for the use of your personal information for purposes other than those listed above.

CAN YOU FIND OUT WHAT PERSONAL INFORMATION SWTA HOLDS ABOUT YOU?

You have the right to access personal information held about you. If you wish to make a Data Subject Access Request, please contact: Samantha Wood at: admin@swtheatreacademy.co.uk

CHILDREN'S PRIVACY

We are particularly concerned with the protection and privacy of children and are confident that our systems and processes are designed to be fair to children, to protect their rights and freedoms, and to be fully in line with their reasonable expectations and those of their parents/guardians. We have taken practical precautions to avoid any risks associated with processing children's data. On occasions we may need to contact students/parents/guardians to check the age of a student and accuracy of their data.

Children have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased. They should be aware of what their personal data is used for and they can raise any issues they may have with their teacher, who will pass it on to the Academy Principal.

A parent may exercise these rights on behalf of their child if the child is too young to understand the implications of their rights.

If you are under 18 and you provide us with information on an application form (online or printed), we may require your parent(s)/guardian(s) permission.

Our online sites are not directed to children under the age of thirteen and we do not knowingly collect personal information from children under the age of thirteen from any of these sources.

THIRD-PARTY SERVICE PROVIDERS

USE OF DATA PROCESSORS

Data processors are third parties who we have contracts with and who provide services for us and have their own GDPR policies in place. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. The following is a list of our main data processors:

Thinksmart

We use ThinkSmart software to hold all of our business administration in one place. It stores your information and uses it for administrative purposes such as timetables, registers, emailing and invoicing.

Xero Accounting Software - provides multiple layers of security to protect our data and access is tightly controlled. Data is encrypted

POSTING

When sending letters, parcels and purchases we will share your postal address with the delivery service (Royal Mail or Parcel Force).

WEBSITE HOSTING

We use a third party service, 1&1 IONOS Limited to host our website. 1&1 IONOS Limited have their own GDPR policy in place and are contractually obliged to treat any information on our private website as confidential and only use such information for the purpose of providing SWTA with web hosting.

WHAT ARE COOKIES AND DO WE USE THEM?

Cookies are text files that websites place on your own computer to store information specific to you. The SWTA website uses cookies to improve your experience while you navigate through the website. Of these cookies, the cookies that are categorized as necessary are stored on your browser as they are essential for the working of basic functionalities of the website. We also use third-party cookies that help us analyse and understand how you use this website. These cookies will be stored in your browser only with your consent. You also have the option to opt-out of these cookies, but opting out of some of these cookies may have an effect on your browsing experience. We do not store any personal data on this website.

CRB/DBS SERVICE

A DBS checking service for SWTA teachers and chaperones is provided by Due Diligence Checking Ltd. Information provided by them to SWTA will only be shared with the individual concerned and other organisations that we provide our services to. The records are kept for 3 years and then deleted.

USER GENERATED CONTENT- SOCIAL MEDIA

If you engage with SWTA on any of our social media channels you should know that we do not collect your personal information; it remains within the platform that we are using and so you should familiarise yourself with their privacy notices and policies.

If you send us a direct message, your information still remains within the platform unless we ask you to provide us with your contact details to continue the conversation offline or privately, and you consent to do that.

Please remember that any information you submit or post as user-generated content to our Social Media sites (Facebook and Instagram) becomes public information. You should exercise caution when deciding to disclose your personal, financial or other information in such submissions or posts. SWTA cannot prevent others from using such information in a manner that may violate this Privacy Statement, the law, or your personal privacy and safety. SWTA is not responsible for the results of such postings.

HOW LONG WILL WE KEEP PERSONAL INFORMATION?

We limit access to personal information to those who have a business need and only keep the information we hold about our customers and students for as long as is reasonable necessary to deliver the services we

are providing you with, to complete the relevant financial accounting years and in line with legislative requirements.

SWTA retains data records for 2 years after a student leaves the dance school to enable the completion of relevant business accounts. Children's accident and injury records are held for 19 years (or until the child reaches 21 years), and Child Protection records for 22 years (or until the child reaches 24 years). Teachers records must be kept for 6 years after the member of staff leaves, before they can be erased.

WHERE IS THE INFORMATION STORED?

We use secure, password protected and encrypted technologies to help protect your personal information from unauthorised access, use or disclosure. We store the personal information you provide on computer systems and software which have carefully controlled and limited access and which are located in secure facilities.

The security measures described above ensure that all reasonable steps are taken to protect your personal information. However, the nature of the Internet means that an absolute guarantee of security cannot be offered, and, as with all Internet transactions, you should be aware that there may be a very small security risk when disclosing information online.

All paper copies of children's and staff records are kept in a locked filing cabinet at SWTA's office address and remain on site at all times. These records are shredded after the relevant retention period.

SWTA stores personal data held visually in photographs or video clips or as sound recordings within secure technologies and written consent has been obtained by means of a customer signature on our Photography and Filming Policy. No names are stored with images in photo albums, displays, on the website or on SWTA's social media sites.

Access to SWTA computers and the Dancebiz database for registers is password protected and where possible additional security levels have been applied, such as 2-step verification. When a teacher leaves the company passwords are changed in line with this policy and our Safeguarding policy. Should any portable data storage be required to store personal data (e.g. USB memory stick) we will ensure it is password protected and/or stored in a secure location.

UPDATES TO OUR PRIVACY STATEMENT

We will post changes to this Privacy Statement in line with any legislative changes and indicate the effective date when these come into effect. If we make any material changes, we will notify you by sending an e-mail to the e-mail address you have most recently provided us with.

Samantha Jayne Wood, Principal & Director, Samantha Wood Theatre Academy

Sue Wood, Business Manager & Director, Samantha Wood Theatre Academy

THE ICO (INFORMATION COMMISSIONERS OFFICE) NUMBER FOR SWTA IS:
ZA383559

IF YOU ANY QUESTIONS OR COMMENTS ABOUT THIS PRIVACY STATEMENT OR GDPR
POLICY PLEASE EMAIL: ADMIN@SWTHEATREACADEMY.CO.UK