



Rochester School of Dance

Privacy Policy

1. INTRODUCTION

This privacy policy provides you with details of how I collect and process your personal data.

Samantha Nicholson of The Rochester School of Dance is the data controller and I am responsible for your personal data (referred to as "I", "me" or "my" in this privacy policy).

Contact Details

My full details are:

Name: Samantha Nicholson trading as Rochester School of Dance

Email address: samseenan@hotmail.co.uk

Telephone number: 07710 547672

It is very important that the information I hold about you is accurate and up to date. Please let me know if at any time your personal information changes by emailing me at samseenan@hotmail.co.uk

2. WHAT DATA DO I COLLECT ABOUT YOU, FOR WHAT PURPOSE AND ON WHAT GROUND I PROCESS IT

Personal data means any information capable of identifying an individual.

I may process the following categories of data about you

Personal data if you are a visitor

This includes all students who attend The Rochester School of Dance initially on the 4 week trial period. During this period I will need to collect the students full name, contact number for use as an emergency contact and for general administration purposes and an email address. My legal grounds for processing your data is my legitimate interest to develop my service to you.

Personal data from the Enrolment Form.

- I will use your non-sensitive personal data (that is the data you completed in section 1 of the Enrolment Form) to (i) register you as a new client, (ii) manage payment, (iii) collect and recover monies owed to me (iv) to manage my relationship with you, (v) send you details of my services and goods.
My legal grounds for processing your data in relation to points (i) to (iv) above are for performance of a contract with you and in relation to (iii) and (v) above, necessary for my legitimate interests to develop my services and grow my business and to recover monies owed.
- I will use your sensitive personal data (that is the data you completed at section 2 of the Enrolment Form) for the purposes of providing a safe service to you or if I need to comply with a legal obligation. My legal ground for processing this data is your explicit consent.

I will not share your details from the Enrolment Form with third parties for their marketing purposes.

Communication Data

This includes any communication that you send to me whether that be through the contact form on my website, through email, text, phone calls, social media messaging, social media posting or any other communication that you send me. I process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. My lawful ground for this processing is my legitimate interests which in this case are to reply to communications sent to me, to keep records and to establish, pursue or defend legal claims.



PHOTOGRAPHIC DATA

This includes any photo or video taken by me or a professional photographer/videographer during an activity or lesson. I process this data for (i) documenting and recording activities, (ii) recording learning and development progress (iii) for publishing on my website, (iv) for social media posting and advertising, (v) for advertising on flyers, banners, leaflets and theatre programmes. My legal ground for processing this data is your explicit consent. (Consent Form – Use of Images). You can withdraw this consent at anytime by emailing samseenan@hotmail.co.uk.

USER AND TECHNICAL DATA FROM MY WEBSITE

that includes data about how you use my website. I process this data to operate my website and ensure relevant content is provided to you, to ensure the security of my website, to maintain back- ups of my website and to enable publication and administration of my website. I collect technical data such as your IP address, details about your browser, length of visit to pages on my website, page views and navigation paths, details about the number of times you use my website, time zone settings and other technology on the devices you use to access my website. The source of this data is from an analytic tracking system. I process this data to analyse your use of my website, to administer and protect my business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of my advertising. My lawful ground for this processing is my legitimate interests which in this case is to enable me to properly administer my website and my business and to grow my business and to decide my marketing strategy. My website host is Yell.com and their privacy policy and terms of use can be found on every page of my website in the footer.

MARKETING COMMUNICATIONS

My lawful ground for processing your personal data to send you marketing communications is your consent. If you opt out of receiving marketing communications this opt-out does not apply to personal data provided for registration, invoicing, collecting monies owed and managing my relationship with you.

3. DISCLOSURES OF YOUR PERSONAL DATA

I may have to share your personal data with the parties set out below:

- Service providers who provides IT and system administration services.
- If your child wishes to take a dance examination I will need to share some of your data with the examination board. The name of the exam board is the ISTD (Imperial Society of Teachers of Dancing).
- If your child wants to perform in our school shows or any of our performances I will need to share some of your data with the local council to apply for a performance licence.
- HMRC for tax purposes.
- Cloud based storage systems.
- Government bodies that require me to report processing activities.
- Children's services or the police in relation to any safeguarding issues.
- Software companies to enhance photos ,edit videos and add text to videos or photos.
- Printing companies to print photos onto leaflets, flyers, banners or brochures.

I require all of these third parties to whom I transfer your data to respect the security of your personal data and to treat it in accordance with the law. They are only allowed to process your personal data on my instructions and they must keep it confidential.



4. INTERNATIONAL TRANSFERS

Some of our third party providers (in particular some cloud based storage systems) are businesses based outside of the EEA in countries which do not always offer the same levels of protection for your personal data. I do my best to ensure a similar degree of security by ensuring that contracts, code of conduct or certification are in place which give your personal data the same protection it has within Europe (mainly protected under the US Privacy Shield). If I am not able to do so I will request your explicit consent to the transfer and you can withdraw this consent at any time.

5. DATA SECURITY

I have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation.

I have secured your data in the following ways:

- All data stored on my phone will be encrypted.
- All data stored on my laptop or in a cloud based storage system will be encrypted with a password.
- All data stored in paper form will be kept in a locked container at my home and only I have access to this.
- Any data that needs to be transferred by email will be transferred on an attached password protected document. The password will be forwarded separately to the email.
- Registers will be paper form and will only contain first names. If there are duplicate names in the same class then your first name followed by the first letter of your surname will appear on the register.

6. DATA RETENTION

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

When deciding what the correct time is to keep the data for I look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires me to keep basic information about my customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

7. YOUR LEGAL RIGHTS

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email me at samseenan@hotmail.co.uk

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

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

A handwritten signature in black ink, consisting of several loops and strokes, positioned in the upper right corner of the page.

If you are not happy with any aspect of how I collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). I would be grateful if you could contact me first if you do have a complaint so that I can try to resolve it for you.

8. Keeping your data up to date

I have a duty to keep your personal data up to date and accurate so from time to time I will contact you to ask you to confirm that your personal data is still accurate and up to date.

If there are any changes to your personal data (such as a change of address) please let me know as soon as possible by emailing samseenan@hotmail.co.uk