

# Caroline Graham School of Dance Privacy Policy



On 25<sup>th</sup> May 2018, the General Data protection Regulation (GDPR) came into force. This gives you more control over how your data is used. The Caroline Graham School of Dance (CGSD) has updated its privacy policy in line with the new GDPR. You can trust us to respect your privacy and to keep your personal information safe.

We will :

- Be transparent about the information we are collecting and the what we will do with that information
- Only use your personal information for the purposes described in our privacy policy
- Put in place measures to protect your personal information and to keep that data secure
- Respect your data protection rights and aim to give you control over your own information
- Listen if you tell us you don't want to receive any marketing messages. We will, of course, continue to send you essential information relating to classes and invoicing.

## What do we mean by personal information?

Personal information means details which identify you, or could be used to identify you, such as name, contact details or email address. It also applies to any relevant medical information that you need to provide CGSD in order to keep staff and students safe and well. This policy applies to personal information about you and your child, or children, that we collect, use and otherwise process regarding your relationship with us as a customer. We take care to keep all personal information provided to CGSD protected and secure.

## What do we use your personal information for?

The personal information that you provide CGSD with on enrolment of your child or children is used to:

- Compile class registers including emergency contact details in order to protect your child or children at all times
- Compile class registers for termly attendance information
- Invoice you for class fees in respect of lessons taken or to be taken
- Contacting you regarding class information or CGSD events. We only contact you with essential information.
- To create WhatsApp groups of your child's class so that you can be contacted quickly and easily with essential information regarding that class

## Who are the "Controllers" and "Processors" of the personal information held by CGSD?

Caroline Graham is the controller of the information held by CGSD and, as such, determines the purposes and means of processing personal data. At present, **Becky Florey** and **Samantha Hartley** are the processors for CGSD and, as such, are responsible for processing personal data on behalf of the controller.

## How long do we keep your personal information?

We keep your personal information active for the time that you, your child or children are enrolled in the school. Once you have left CGSD, your information remains active until your account is clear of any outstanding invoices and monies owed. Once you, your child or children are no longer active members of CGSD, your information will be anonymised and then securely deleted after 3 years. Paper enrolment forms are securely kept until the information is securely stored in the CGSD data base and then securely destroyed. Registers are kept for attendance information and securely destroyed at the end of term.

### **Who do we share your information with?**

CGSD will never sell your personal information to any third parties. We limit access to your personal data to those teachers or administration staff who have a business need to know. Personal information is only shared with class teachers, in the form of class registers, so that you, your child or children are kept safe during class time. For students of CGSD entering examinations, your consent will be required in order to share personal information with the examination board in question. Personal information might be shared in response to valid, legal requests from Government and law enforcement agencies. Personal data may be shared with third parties, such as law firms and law courts, to enforce or apply any contract with you. Personal information may be shared with third parties, such as police or regulatory authorities, to protect our rights or safety of customers, staff and assets.

CGSD has put in place appropriate security measures to prevent data being lost, used or accessed in an unauthorised way, altered or disclosed. In addition we only process your data on instruction of the controller and all staff are subject to a duty of confidentiality.

### **Gaining access to the personal information we hold on you**

Under the UK Data Protection Act 1998, you may request a copy of any personal data held about you by CGSD. There is no fee for this request. Any request must be in writing and must contain the following information:

- Your full name and postal address
- Details of your request

You must also provide:

- A photocopy of your current passport or driving license so we can verify your identity
- Your signature and date of request

Please send your request to Caroline Graham.

### **What are your legal rights in relation to the personal information we hold about you?**

Under data protection laws in the EU and UK, you have certain rights in relation to your personal data. Your rights include the following:

- Requesting that we do not send you any marketing emails
- You may access the personal information we hold on you for free. Please see the preceding section for details of how to go about this.
- You may ask us to correct your personal information (the right of rectification), if that information is incorrect.

- You may ask for personal information which identifies you to be erased, taking into consideration that CGSD requires emergency contact and invoicing details if you, your child or children are to be actively enrolled.

### **The right of rectification**

You are legally able to request that CGSD amend any personal information, in order that the personal data we hold on you is correct. CGSD would ask that you inform us immediately of any change of name, address, email address or mobile number. CGSD would also ask you to inform us of any medical information that is vital for the safety and wellbeing of students and staff.

CGSD will undertake to review data periodically in order to make any rectifications necessary. As of September 2018 you will have access to the CGSD Customer Portal where you will be able to check and rectify your own data.

### **How will we inform you of any changes to this privacy policy?**

If we change this privacy policy, we will let you know by publishing an updated version via the Customer Portal. It is also available via the CGSD website. We are committed to protecting and respecting your privacy and will continue to do so in any future changes to this policy.

### **Update to the Privacy Policy with regard to our Covid-19 Management Guidelines October 2020**

In line with current Government guidance, class teachers keep and hold a register of classes in order to Track and Trace should this become necessary. These registers contain student names and emergency contact details and are always kept secure and in confidence by class teachers. As stated previously in this policy these registers are taken to provide CGSD with attendance information and emergency details should the need arise in class. Registers are securely destroyed at the end of term. With Track and Trace requirements CGSD shall continue to keep attendance records as outlined here so that if a case of positive Covid-19 is reported to us and affects a class, the data controller and processors are able to contact all those impacted. Details for Track and Trace would be kept for 21 days after the final class of a term and then securely destroyed as per our usual privacy policy.

This policy came into effect on 25<sup>th</sup> May 2018, replacing our previous privacy policy. This privacy policy applies to all the information we process about you, your child or children in connection with your relationship with us as a customer of CGSD.

If you have any questions about this policy, please contact **Caroline Graham**.

We work hard to handle your information responsibly. If you unhappy about the way we do this, please contact **Caroline Graham**, who will address your concerns.