

## **ABC Ballet School – Privacy Notice & Data Handling Policy**

ABC Ballet School is committed to protecting your data and your privacy. We aim to ensure that any information you give us is held securely and safely.

Please read this policy carefully, together with any other documents referred to in this policy, to understand how we collect, use and store your personal information.

If you have any questions about this policy or how your data is handled, please write to:

### **The Data Protection Officer**

**ABC Ballet School  
53 Corsehill Street  
London SW16 6NE**

**Email:** [dataprotection@abcballetschool.org](mailto:dataprotection@abcballetschool.org)

**Telephone:** **020 8769 4337 (voicemail when unattended)**

### **Data Protection:**

ABC Ballet School will never share your information with any other organisation for their own marketing purposes and we will never sell your information for any reason whatsoever. All data physically collected is stored in a locked filing cabinet. All electronic data is stored on an encrypted computer using industry-standard encryption algorithms. All electronic data is backed up securely to an encrypted online datastore to which neither the backup vendor nor anyone else has access.

### **Purposes:**

We will always endeavour to be clear, honest and transparent with you whenever we collect and use your personal data. The overview below summarises the reasons why we may collect and use your data.

The main reason for collecting and storing your personal information is to enable the provision of ballet classes and associated teaching activities, including the submission of pupil information to the relevant examination bodies, and the processing of information relating to Ballet School events such as shows and festivals etc.

### **Lawful Processing:**

ABC Ballet School, like all organisations in the UK, needs a lawful basis to collect and use your personal data. The law allows for six legitimate purposes which organisations can rely on to process people's personal data legally. Of these, only three are relevant for the type of activities listed above:

- Information is processed on the basis of parental/carer's individual's consent.
- Information is processed in line with a contractual relationship.
- Information is processed on the basis of it being a legitimate interest for ABC Ballet School to do so.

We may also share your personal information if we are compelled to do so by a legal authority acting in compliance with the law.

**Consent:**

ABC Ballet School will always ask for your consent in processing the data required for your child to participate in the school's activities. This consent is granted by you on the enrolment form which each parent/carer signs to enrol their child in the school. Additional activities outside the normal scope of ballet lessons, such as ballet shows, festivals and special demonstrations, require explicit, written consent by the parent/carer too, and this will always be obtained prior to a child's participation in any such events.

Where you give us consent to process your data in line with the above objectives, it is your right to withdraw that consent at any time. This would normally be done by withdrawing your child from the school and thereby ending the contractual right for us to process your data. To pursue this option please contact the Principal in the first instance on [mail@abcballetschool.org](mailto:mail@abcballetschool.org) or the Data Protection Officer on [dataprotection@abcballetschool.org](mailto:dataprotection@abcballetschool.org) or telephone 020 8769 4337. The Data Protection Officer is Chris Allen.

ABC Ballet School holds and processes personal details in accordance with the Data Protection Act 1998 and is registered with the office of the Information Commissioner <https://ico.org.uk/>

**Contractual Relationships:**

We enter into a contractual relationship with you to provide termly ballet tuition for your child until such time as you notify us in writing to cancel.

**Legitimate Interests:**

The law allows personal data to be legally collected and used by an organisation if it is necessary for a legitimate business interest of the organisation - as long as its use is fair and balanced and does not unduly impact the rights of the individual concerned.

**What information we collect:**

We collect and use personal information such as names and address details, age and ethnicity, as well as other contact information such as email addresses and telephone numbers. We also collect medical information, where appropriate, regarding your child that may have an impact on the way their teaching is conducted so that informed, responsible care can be provided during their classes.

We also keep a record of payments made for tuition fees, uniform purchases, exam bookings, show tickets and other related items.

### **Sensitive personal information:**

Under data protection law, certain categories of personal information are recognised as sensitive, including health information, race, religious beliefs, and political opinions ('sensitive personal data'). In limited cases, we may collect sensitive personal data about you. Of those categories, the only ones that we may collect information on are health information (where necessary) and race (ethnic origin).

We would only collect sensitive personal data if there is a clear reason for doing so, as outlined earlier in this policy, such as where we need this information to ensure that we provide appropriate facilities or enable your child to participate in an event (such as a ballet show or festival demonstration, where we would need prior knowledge of any relevant medical conditions).

We will only use sensitive information provided to us for the purpose it is provided.

### **Data Retention:**

ABC Ballet School removes personal data from its systems in line with its data retention policy. The length of time each category of data will be retained will vary on how long we need to process it, the reason it is collected, and in line with any statutory requirements.

After this point the data will either be deleted or rendered anonymous.

### **Data Sharing:**

As mentioned above, ABC Ballet School will never sell your personal information and will never share it with another organisation for their own marketing purposes. However, there may be a number of legitimate situations where we may potentially share your information with third parties whom we have contracted to fulfil specific services for us. In the event of this happening, communication will be made to ensure that you are aware of this and have the opportunity to opt-out should you so wish.

Again, we may also share your personal information if we are compelled to do so by a legal authority acting in compliance with the law.

### **Your Data Protection Rights:**

**Right to be informed:** You have the right to be told how your personal information will be used. This policy document, and shorter summary statements used on our communications, are intended to be a clear and transparent description of how your data may be used.

**Right of Access:** You can write to the Data Protection Officer asking what information we hold on you and to request a copy of that information. Currently the Data Protection Act 1998 gives us 40 days to respond. From May 2018 we will have 30 days to comply once we are satisfied you have rights to see the requested records and we have successfully confirmed your identity.

**Right of erasure:** From May 2018, you have the right to be forgotten (i.e. to have your personally identifiable data deleted). This would only be applicable upon withdrawal of your child from the school and is subject to the legal requirement to hold certain tax and financial data for a statutory period of time.

**Right of rectification:** If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated.

**Right to restrict processing:** In certain situations you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

**Right to data portability:** Where we are processing your personal data under your consent the law allows you to request data portability from one service provider to another. This right is largely seen as a way for people to transfer their personal data from one service provider to a competitor and is unlikely to be relevant to your relationship with ABC Ballet School.

**Right to object:** You have an absolute right to stop the processing of your personal data for direct marketing purposes. [Note - ABC Ballet School does not use your personal data for any marketing purposes whatsoever.]

#### **Data Security:**

We maintain a high level of physical and electronic security in relation to the collection, storage and disclosure of your information. We take reasonable steps to ensure that any information we hold about you is protected, including industry-standard encryption on the computer that stores your information and similar encryption on the data backups. Sensitive personal information, as referred to in the categories above, will be encrypted before emailing and we would encourage all parents/carers to adopt the same policy if they intend to email similar, sensitive information to the school.

#### **Cookies:**

A cookie is an alphanumeric text file that is sent from a website and stored on your computer's hard drive by your web browser. Cookies are essential for some websites to operate effectively but also to make your visit to a website a better experience, for example, by remembering who you are, so that when you visit again, it recognises you as a previous visitor.

ABC Ballet School does not currently make any use of cookies to track or analyse visits to our website. Links to 3<sup>rd</sup>-party websites may incur the presence of cookies when you access those links. Please refer to the relevant 3<sup>rd</sup>-party website for its policy on cookie management.

#### **Changes to ABC Ballet School's Privacy Statement:**

From time to time, we will make changes to this statement to keep it up to date and relevant. Please make sure you check regularly to see what's changed. This statement was last updated on 15<sup>th</sup> May 2018.

#### **What to do if you have any concerns?**

In the first instance, please talk to us directly so we can help resolve any problem or query. You can contact the Principal directly – Alison Allen – [alison@abcballetschool.org](mailto:alison@abcballetschool.org) or the Data Protection Officer – Chris Allen – [dataprotection@abcballetschool.org](mailto:dataprotection@abcballetschool.org)