

## **INTRODUCTION**

Harlequins Theatre School is committed to protecting you and your dependents' personal information. We are committed to providing a safe environment for all our customers, employees, casual and freelance workers and everybody who comes into contact with us, both physically and virtually (online). This Privacy Statement relates to the use of any personal information provided to us online or via application forms, telephone, email exchange, letters or correspondence.

Whenever you provide such information, we are legally obliged to use your information in line with current legislation concerning the protection of personal information, including the Data Protection Act 1998 and the General Data Protection Regulations.

## **DATA PROTECTION PRINCIPLES**

The legislation sets out various data protection principles. These include that personal information is:

- 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

## **YOUR RIGHTS**

The legislation conveys various individual rights. These include the following:

- The right to be informed
- The right of access
- The right to rectification
- The right to erase
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

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## **WHAT INFORMATION DOES HARLEQUINS THEATRE SCHOOL HAVE ABOUT ME?**

The legislation requires that there is a clear legal basis for processing personal information. In general Harlequins Theatre School relies on the individual's consent in order to process their data.

When you participate in or sign up to any Harlequins Theatre School class, activity or workshop, we may collect and store personal information about you. This can consist of information such as your name, email address, postal address, telephone or mobile number and date of birth, depending on how you are engaging with us. By submitting your details, you enable us to provide you with the products or services that you have selected.

Harlequins Theatre School may use images resulting from the photography/video filming, and any reproductions or adaptations of the images for fundraising, publicity or other purposes to help achieve the group's aims. This might include (but is not limited to), the right to use them in their printed and online publicity, social media, press releases and funding applications.

Harlequins Theatre School 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.

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## **WHAT ARE COOKIES AND HOW DO YOU USE THEM?**

Cookies are text files that websites place on your own computer to store information specific to you. Our website does NOT use cookies.

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## **HOW WILL YOU USE MY PERSONAL INFORMATION?**

- We will use your personal information for a number of purposes including:
- To provide you with information about our products, services and activities and to deal with your requests and enquiries, including complaints
- 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, etc.)
- To contact you about an application you have made
- To process your application for employment and where applicable your employment once appointed
- As and when we need to use your personal information for reasons other than the ones specified above, we will ensure that we notify you 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.

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## **USE OF DATA PROCESSORS**

Data processors are third parties who provide services for us. We have contracts in place with our data processors. 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.

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## **POSTING**

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

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## **WEBSITE HOSTING**

We use a third party service, Very good website to host our website. Very Good website are contractually obliged to treat any information on our private website as confidential and only use such information for the purpose of providing Harlequins Theatre School with web hosting.

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## **CRB/DBS SERVICE**

A DBS checking service for Harlequins Theatre School teachers and chaperones is provided by Ucheck. Information provided by them to Harlequins Theatre School will only be shared with the individual concerned.

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## **SUPPLIERS / 3RD PARTIES**

Registers, Invoicing and Database

We use a third party service, ThinkSmart software to store your information and use it for administrative purposes such as timetables, registers, emailing and invoicing customers.

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## **HARLEQUINS THEATRE SCHOOL MAY CONTACT YOU**

- To send you relevant communications for payment of fees and changes to classes
- In relation to any service or activity you have signed up for in order to ensure that we can deliver the services to you
- In relation to any correspondence we receive from you or any comment or complaint you make about our products or services
- To send you information you requested when you voluntarily contacted us via our website

## **HOW LONG WILL WE KEEP PERSONAL INFORMATION?**

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We keep the information we hold about our customers and students for as long as is necessary to deliver the services we are providing you with.

## **WHERE IS THE INFORMATION STORED?**

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We use secure technologies to help protect your personal information from unauthorised access, use or disclosure. We store personal information you provide on computer systems which have carefully controlled 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 small security risk when disclosing information online.

## **CAN I FIND OUT WHAT PERSONAL INFORMATION HARLEQUINS THEATRE SCHOOL HOLDS ABOUT ME?**

You have the right to access certain personal information held about you. If you wish to make a Data Subject Access Request, please contact

## **LEGAL OBLIGATION**

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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.

## **HARLEQUINS THEATRE SCHOOL 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 comes into effect on 25th May 2018.

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

Harlequins Theatre School is committed to protecting the rights and freedoms of individuals with respect to the processing of children's, parents, visitors and staff personal data.

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

## **GENERAL DATA PROTECTION REGULATION POLICY STATEMENT**

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### **1) THE RIGHT TO BE INFORMED**

Harlequins Theatre School is required to collect and manage certain data. We need to know parent's names, addresses, telephone numbers, email addresses. We need to know children's' full names, addresses, date of birth along with any SEN or medical requirements.

We are required to collect certain details of visitors and chaperones to our dance school. We need to know visitors and chaperones names, telephone numbers, and where appropriate company name. This is in respect of our Health and Safety and Safeguarding Policies.

Although our teachers are freelance, Harlequins Theatre School is required to hold data on its Teachers; names, addresses, email addresses, telephone numbers, date of birth, National Insurance numbers 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) and proof of eligibility to work in the UK. This information is sent via a secure file transfer system to DDC for the processing of DBS checks. DBS Numbers and date of issue are also held on a central staffing record. Copies of teachers DBS are shared with the respective schools in which the teachers work in for Safeguarding purposes.

Harlequins Theatre School does not use Cookies on its website nor do we collect data for Google Analytics.

### **2) THE RIGHT OF ACCESS**

At any point an individual can make a request relating to their data and Harlequins Theatre School will need to provide a response (within 1 month). Harlequins Theatre School 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 Harlequins Theatre School has a legal duty to keep children's and parents details for a reasonable time, Harlequins Theatre School retain these records for 3 years after leaving the

dance school, children's accident and injury records for 19 years (or until the child reaches 21 years), and 22 years (or until the child reaches 24 years) for Child Protection records.

Teachers records must be kept for 6 years after the member leaves, before they can be erased.

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 Harlequins Theatre School 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**

Harlequins Theatre School requires data to be transferred from one IT system to another; such as from Harlequins Theatre School 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 Harlequins Theatre School does not use personal data for such purposes.