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**Privacy Statement**

**Introduction**

DanceMode Academy (DMA) 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 • Accurate

& not excessive

* Kept for no longer than absolutely necessary • Kept safe and secure
* Not transferred outside the European economic area without adequate protection

**GDPR includes 7 rights for individuals**

* 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

**What information does DanceMode have about me?**

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

When you participate in or sign up to any DMA Dance 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.

When taking pictures of students in class or filming performances, DMA ask for parental permission at the time of registration. DMA may use the 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.

DMA 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.

**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.

**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.

**How will you use my personal information?**

**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.

**Posting**

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

**Website hosting**

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

**CRB/DBS service**

A DBS checking service for DanceMode.Academy Dance teachers and chaperones is provided by Due Diligence Checking Ltd. Information provided by them to DMA will only be shared with the individual concerned. The records are kept for 3 years and then deleted.

**Registers, Invoicing and Database**

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

**Suppliers / 3rd parties**

* 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

**DanceMode may contact you**

If you are under 18 and you provide us with information on an application form (online or printed), as your parent(s)/guardian(s) permission will be required.

**Young users**

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

**How long will we keep personal information?**

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.

**Where is the information stored?**

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

**Can I find out what personal information DMA holds about me?**

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.

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**DanceMode Academy GDPR Policy (General Data Protection Regulation 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.

DMA 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 Individual Rights**

**1) The right to be informed**

DanceMode Academy is a registered Performing Arts provider with the IDTA and as so, 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 and Education school, along with any SEN requirements or medical requirements

We are requested to provide this data to the Council if and when our students participate in public performances and the IDTA for those students taking exams; this information is sent to the Local Authority via a secure electronic file transfer system.
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, email address and where appropriate company name. This is in respect of our Health and Safety and Safeguarding Policies.

Although our teachers are freelance, DanceMode Academy 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.

DMA 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 DMA will need to provide a response (within 1 month). DMA 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 DMA has a legal duty to keep children’s and parents details for a reasonable time, DMA 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 of 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 DMA 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**

DMA requires data to be transferred from one IT system to another; such as from DMA to the Local Authority, for performance BOPA licences 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.

**6) The right to object**

DMA will send out marketing material relating to DMA related activities from time to time, to our students, parents and persons who have enquired about our classes. Parents, visitors and staff can object to their data being used for certain activities like marketing or research. Please inform us if you do not wish to receive this information

**7) The right not to be subject to automated decision-making including profiling**

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

**GDPR includes 7 rights for individuals**

All paper copies of children's and staff records are kept in a locked filing cabinet at DMA Head Office. Members of staff can have access to these files but information taken from the files about individual children is confidential and apart from archiving, these records remain on site at all times. These records are shredded after the retention period.

Information about individual children is used in certain documents, such as, a weekly register, medication forms, referrals to external agencies and disclosure forms. These documents include data such as children's names, date of birth, contact numbers and sometimes address. These records are shredded after the relevant retention period.

DMA collects a large amount of personal data every year including; names and addresses of those on the waiting list. These records are shredded if the child does not attend or added to the child’s file and stored appropriately.

DMA stores personal data held visually in photographs or video clips or as sound recordings. Written consent is obtained at registration and via the photo and video consent form/permission to Perform reply slip form. No full names are stored with images in photo albums, displays, on the website or on DanceMode social media sites. Access to all DMA computers and the Membermeister database for registers is password protected. When a teacher leaves the company these passwords are changed in line with this policy and our Safeguarding policy. Any portable data storage used to store personal data, e.g. USB memory stick, are password protected and/or stored in a locked filing cabinet.

GDPR means that DMA must;
\* Manage and process personal data properly
\* Protect the individual’s rights to privacy
\* Provide an individual with access to all personal information held on them

This Policy was created for DanceMode Academy in April 2018. Signed on behalf of DanceMode Academy

Suzanne Mendonca, Principal DanceMode Coulsdon

Policy review date: April 2019

**If you any questions or comments about this Privacy Statement or GDPR Policy please email** **suzanne@dancemode.co.uk**