

**Privacy and Data Protection Policy**

1. **CLIENTS**

This notice sets out what information about you we will hold and process if you, or your children, are enrolled as students in Turning Pointe School of Dance.

* 1. **Data we hold**

As our client, we will hold the following information (i.e. personal data) about you and/or your child/children:

* Name, identity and contact information
* Information and documents about your matters, enquiries and involvement with the school, including communications with you (e.g. emails, enrolment, timetabling, invoices, billing etc.)
* Information relating to any health and/or medical conditions and allergies that we need to be aware of
* Photographs and video recordings that may allow for identification
	1. **Uses of your information**

All of our processing (i.e. uses) of personal data have a basis in law. References to the basis of processing (e.g. “(Basis: Art.6(1)(b).)”) are a reference to the article of the UK General Data Protection Regulation under which we undertake the processing in question.

* + 1. **Providing you with dance teaching-related services**

We use the information hold about you, both personal and otherwise, to provide you with dance teaching/classes and other associated services.

For example, we will add your contact details, details of your identity and, if applicable, details of your child’s/children’s identity to our database in order to timetable dance classes, monitor attendance, and communicate with you.

We will also use this information to invoice you and keep track of payments that you make, and may also use this information to contact you regarding dance classes and offers that we think may be of interest to you.

(**Basis**: Art.6(1)(b): processing your contact information and other personal data is necessary for us to deliver our services to you. Art.6(1)(f): processing your contact information to communicate dance school offers and services to you is a legitimate interest of the school.)

* + 1. **Protection of health and welfare**

We will only use information relating to health and medical conditions and allergies in order to ensure specific care is taken and you/your child’s health and wellbeing is protected to the best of our ability.

For example, in the event of an emergency, information relating to your/your child’s medical conditions may be shared with a medical professional so that appropriate care can be provided.

(**Basis**: Art.6(1)(d): this processing is necessary to protect the vital interests of Turning Pointe pupils or other natural persons.)

* + 1. **Fulfilment of legal obligations**

The majority of the dance school’s pupils are minors/children, and as a result the school is subject to a number of legal and regulatory obligations pertaining to safeguarding and child protection (e.g. under The Children Act 1989). If we are required by law to process personal data in order to fulfil these, or any other, legal obligations (for example, in order to report an instance of suspected abuse or neglect to the relevant authorities) we will do so.

(**Basis**: Art.6(1)(c): this processing is necessary to comply with legal and regulatory obligations.)

* + 1. **Training, educational and marketing purposes**

We often take photos and videos in our classes, for training, educational and marketing purposes. For example, photographs taken in classes may occasionally be included on promotional or advertising material, such as leaflets. We will only use photos or videos for marketing purposes if the appropriate permission has been given on the enrolment form.

(**Basis**: Art.6(1)(a): processing of personal data of Turning Pointe pupils for marketing purposes will only be undertaken if consent has been given on the enrolment form. Art.6(1)(f): using photographs and videos taken in classes for internal educational and training purposes is a legitimate interest of the school.)

* + 1. **Examinations, competitions and productions**

In order to enter pupils for examinations and competitions some processing of personal data will be required. For example, in order to enter pupils for Royal Academy of Dance (RAD) or Imperial Society of Teachers Dancing (ISTD) exams, we will need to register those pupils with the exam board and provide certain personal data, including name and date of birth. Similarly, in order to enter pupils for dance competitions, we will need to provide pupils’ personal data, including name and date of birth, to the competition organiser. Pupil personal data, including names and dates of birth, will also occasionally be shared with local authorities for the purposes of securing performing licences for dance school productions.

(**Basis**: Art.6(1)(a): processing of personal data for purposes relating to examinations, competitions and productions will only be undertaken if consent has been given by parents at the time.)

* 1. **Data storage**

All personal data about pupils and parents given to us at the point of enrolment is entered into our database; online software which fully complies with data protection legislation. Access to our database is password protected and only available to Turning Pointe staff.

Personal data we hold will not be processed or transferred outside of the UK unless we have your specific consent, or where the nature of the processing requires it (for example, if you wish to liaise with us via email at a time that you are based or situated outside the UK).

* 1. **Your rights**

Under data protection law you enjoy a range of rights in respect to your/your child’s personal data. In particular, you have a right to:

* Access your/your child’s personal data and details regarding how we use it;
* Obtain a copy of the personal data we hold in relation to you/your child;
* Request deletion/erasure of any personal data we hold in relation to your or your child

If you wish to exercise any of these rights, please contact the Principal.

* 1. **Third parties**

We will only share your/ your child’s personal data with third parties in the following situations (as set out above):

* You have given explicit consent to the data being shared; or
* The sharing of personal data is necessary for compliance with a legal obligation; or
* The sharing of personal data is necessary to protect your or your child’s vital interests, or those of another natural person.

There are, however, some limited exceptions to this:

* In the event of a non-payment of an invoice we may choose to engage a third party to recover moneys owed to the school. This would necessarily require us to share some of your personal data with the third party.
* It is possible, though unlikely, that we might be forced to disclose personal data pursuant to a court order or other binding mandate.
	1. **Retention period**

Any personal data pertaining to your and/or your child/children will be retained for the duration of your relationship with us, and then for seven years. After this period of time has elapsed the data will be deleted.

1. **PROSPECTIVE CLIENTS**

This notice sets out what information about you we will hold and process if you contact us as a prospective client.

* 1. **Data we hold**

If you contact as, we will hold the following information about you:

* Your name, identity and contact information
* Information regarding your query and/or the nature of your communication
	1. **Uses of information**

All of our processing (i.e. uses) of personal data have a basis in law. References to the basis of processing (e.g. “(Basis: Art.6(1)(b).)”) are a reference to the article of the UK General Data Protection Regulation under which we undertake the processing in question.

If you call us or make contact via email or social media, we will follow up your enquiry and discuss your queries with you. We keep a record of all enquiries received to help us plan our business strategy and classes we offer. We will use information obtained during your enquiry to contact you about dance classes and offers that we think may be of interest to you.

(**Basis**: Art.6(1)(b) use of your contact information is necessary for us to follow up your queries. Art.6(1)(f): developing the business strategy, products and services of the school is a legitimate interest of the school.)

* 1. **Your rights**

Under data protection law you enjoy a range of rights in respect to your/your child’s personal data. In particular, you have a right to:

* Access your/your child’s personal data and details regarding how we use it;
* Obtain a copy of the personal data we hold in relation to you/your child;
* Request deletion/erasure of any personal data we hold in relation to your or your child

If you wish to exercise any of these rights, please contact the Principal.

* 1. **Data storage**

All personal data about pupils and parents given to us at the point of enquiry is entered into our database; online software which fully complies with data protection legislation. Access to our database is password protected and only available to Turning Pointe staff.

Personal data we hold will not be processed or transferred outside of the UK unless we have your specific consent, or where the nature of the processing requires it (for example, if you wish to liaise with us via email at a time that you are based or situated outside the UK).

* 1. **Third parties**

As a general matter, we will only share your/ your child’s personal data with third parties with your explicit consent, or when doing so is necessary for compliance with a legal obligation, or when doing so is necessary to protect your or your child’s vital interests (as set out above).

There are, however, some limited exceptions to this:

* In the event of a non-payment of an invoice we may choose to engage a third party to recover moneys owed to the school.
* It is possible, though unlikely, that we might be forced to disclose personal data pursuant to a court order or other binding mandate.
	1. **Retention period**

Any personal data pertaining to your and/or your child/children will be retained for the duration of your enquiry, and then for two years. After this period of time has elapsed the data will be deleted, unless you tell us that you would like us to retain your data for longer so that we can continue to inform you of dance classes and offers that we think may be of interest to you.

Last updated by Lianne Carter, August 2022