



PRIVACY 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 individual's data is not processed without their knowledge and are only processed with their 'explicit' consent. GDPR covers personal data relating to individuals. 360 DANCE is committed to protecting the rights and freedoms of individuals with respect to the processing of children's, parent's, visitor's and staff's 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.

GDPR includes 7 rights for individuals

- 1) The right to be informed: 360 DANCE is a registered dance provider with ISTD and RAD 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. We are requested to provide this data to Kent County Council if and when our students participate in performances and to the ISTD and RAD for those students taking exams; all information is sent to the via a secure electronic file transfer system. We are required to collect certain details of visitors to our Schools. We need to know visitors names, telephone numbers, email address and where appropriate company name. This is in respect of our

Health and Safety and Safeguarding Policies.

As an employer 360 DANCE is required to hold data on its Teachers; names, addresses, email addresses, telephone numbers, date of birth, National Insurance numbers, 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 KCC for the processing of DBS checks.

360 DANCE uses cookies on its website via CloudAccess, this data is anonymous.

2) The right of access: At any point, an individual can make a request relating to their data and 360 DANCE will need to provide a response (within 1 month). 360 DANCE 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, 360 DANCE has a legal duty to keep children's and parent's details for a reasonable time*, 360 DANCE may retain these records for 3 years after leaving pre-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. Staff records must be kept for 6 years after the member of staff leaves employment, before they can be erased. This data is archived securely on Dancebiz (Our online database) and deleted after the legal retention period.

4) The right to restrict processing: Parents, visitors and staff can object to 360 DANCE 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: 360 DANCE requires data to be transferred from one IT system to another; such as from 360 DANCE to the Local Authority, for performance BOPA licences, and to 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: 360 DANCE will send out marketing material relating to 360 DANCE, 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 organizations. 360 DANCE does not use personal data for such purposes.

Storage and use of personal information

All paper copies of children's and staff records are kept in a locked filing cabinet in the 360 DANCE 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 and sometimes address. These records are shredded after the relevant retention period.

360 DANCE 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. Information regarding families' involvement with other agencies is stored both electronically on Dancebiz and in paper format, this information is kept in a locked filing cabinet at 360 DANCE Head Office. These records are shredded after the relevant retention period.

360 DANCE stores personal data held visually in photographs or video clips or as sound recordings, unless written consent has been obtained via the model Release form/fit to perform agreement form. No names are stored with images in photo albums, displays, on the website or on 360 DANCE social media sites.

Access to all computers is password protected. When a member of staff 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 360 DANCE 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

POLICY SIGNED BY: *SADIE VAN DER SPUY* MAY 2018

Policy review date: MAY 2019