



LOUISE MIDDLETON SCHOOL OF DANCE

PRIVACY & DATA PROTECTION POLICY

We at Louise Middleton School of Dance (Referenced in this policy as LMSD) are the data controller. Our contact address is First Floor 7 High Street, Lutterworth LE17 4AT, telephone 07850656081 and office email info.lmsd@gmail.com . This Privacy Policy explains how we will use any personal information we collect and store for you.

WHAT INFORMATION WE COLLECT ABOUT YOU

We collect your personal information when you register your child/children and enrol into our classes.

We also collect information when you voluntarily complete surveys, provide feedback, interact on our social media sites and participate in any discount offers. Website usage information is collected using cookies.

The personal information we collect and use may include:

- Full name and contact details (e.g. home, work, email and web addresses; home and mobile telephone numbers)
- Records of products and services purchased
- Bank and payment details to administer payments
- Date of birth and/or age for safeguarding children and other legal requirements
- Education, professional qualifications/memberships, insurance details, DBS certificate, work history and any references
- Personal information about persons connected to you such as legal guardians, legitimate carers and referees. You must have their authority to provide their information to us.
- Photographs, for promotional purposes, with appropriate permissions and credits only.

THE PURPOSE OF COLLECTING YOUR INFORMATION

We only process your personal information as is necessary:

1. For legitimate interests including:

- Communications, such as news newsletters, notices and updates.
- Payments, invoices & payments via Stripe Inc. automated payment.
- Competitions, Use of student details for application to competitions.
- For surveys, market research and developing statistical data that allow us to improve.

You have the 'right to object' to all legitimate interests relating to you.

2. To comply with a legal obligation including:

- Compliance with legal and regulatory requirements and related disclosures e.g. work with children and vulnerable groups, HMRC
- Exercising your rights under data protection law and making rights' requests

- Verifying your identity under data protection law, other legal and regulatory requirements and related disclosures.
- The establishment and defence of legal claims and rights

3. Based on your consent including:

- Sending you marketing, advocacy and other communications about us where you've given us consent to do so
- Any information that may put you at risk of unlawful discrimination i.e. Special Category Data, such as racial or ethnic origin, health, sexual orientation and disabilities. We seek your consent to provide a fairer service based on equality and we take extra security around your information
- Photographs for use in LMSD publications, publicity materials and online platforms including websites

You can withdraw your consent at any time and we will work to activate it within one month or sooner of the request. Please note that withdrawal of consent from one activity does not mean withdrawal from other activities you've given consent to. Withdrawal of consent may also affect what we can do for you.

WHO WE SHARE YOUR INFORMATION WITH

We may share your information as follows:

- Payments online, by phone or at events: payment systems (e.g. online banking and Stripe inc.) to process your payments for products and/or services. For more information please see Stripe inc. and privacy notices
- Competition entries: Once on our competition team data that you have consented for LMSD to give out is given in strict confidence to legitimate competition organisers, used only for age categorisation and child licensing.
- Exams and Events: If you have opted for your child to take an examination (BBODANCE & Acrobatic Arts) required data will be shared with the named bodies, please see the data protection policy for the relevant body for more information. Shows - We will also contact Harborough district council with regards to Child Licensing.
- Event registration and ticket purchases: Stage Stubs who may use your information to issue receipts. For more information please see Stage Stubs's privacy policy.
- Social media: Facebook, Twitter, LinkedIn and Instagram. For more information please see the 'Terms & Conditions' of the relevant software platform.
- Other parties connected to you where you have given consent to contact them as referees, legal guardians or legitimate carers.
- Government bodies and agencies in the UK: Disclosure & Barring Service for DBS checks and the Information Commissioner's Office
- Courts or tribunals to comply with legal requirements and for the administration of justice.
- Sub-contractors, including consultants, who help us provide our products and services e.g. inspections, meetings, catering, access, technical and accommodation requirements
- Emergency services to protect your vital interests
- Anyone else where we have your consent or as required by law.

HOW LONG WE HOLD YOUR INFORMATION FOR

We will hold your personal information for as long as is necessary to meet the purpose for which it was originally collected.

Where you have given your consent for collecting your personal information, we may hold it for as long as your consent is not withdrawn. We aim to refresh your consent after a reasonable period subject to the exceptions above.

Where you have given consent for direct marketing, we will stop processing your data once we receive a withdrawal of your consent or you have unenrolled from classes. Your information will then be destroyed within 12 months of class withdrawal.

Where we may have collected your personal information to meet a legal obligation (e.g. DBS checks, HMRC, Safeguarding children) we will hold your data in accordance with the retention periods given by legal and regulatory bodies and subject to the exceptions below.

Exceptions: We may hold your personal information for longer than originally collected for archiving, keeping statistical information, to defend or make a legal claim or for as long as a claim may be brought against us or made by us and/or in accordance with legal and regulatory requirements.

YOUR RIGHTS

• **Right to be informed:** You have the right to be informed about the collection and use of your personal data. This Privacy Notice meets this.

• **Right to access your personal information and rectify it:** You have the right to confirm that your data is being processed and to access the information we hold about you. You have the right to have inaccurate data rectified or completed if it is incomplete. You can make these requests verbally or in writing.

We will aim to provide these requests separately within one month following the date of your access or rectification request or three months if it is complex to provide it.

• **Right to erasure** (the “right to be forgotten”): You have the right to have your data deleted by us:

- Your personal information is no longer necessary for the purposes we originally collected it for
- You have informed us that you’ve withdrawn your consent and we do not have any legal grounds to continue to hold your data
- You object to direct marketing from us
- You object to any of the legitimate interests listed in “The purpose of collecting your personal information and the lawful basis”
- We did not collect your information lawfully
- Where we must comply with legal and regulatory requirements

We give emphasis to personal information collected from children where they may have joined social media groups and/or may no longer be a child as they may not have been aware of the risks at the time they may have given consent to us.

Your right to erasure may not apply where we hold your information for one of the following reasons:

- To exercise the right of freedom of expression and information
- To comply with a legal obligation
- For the performance of a task carried out in the public’s interest or in the exercise of official authority
- For archiving purposes in the public interest, scientific or historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of these purposes
- For the establishment, exercise or defence of legal claims.

Where your right to erasure applies we will aim to provide this request within one month following the date of your request or three months if it is complex to provide it.

• **Right to restrict processing:** You have the right to request that we only store your personal information but not use it. This right only applies where:

- You contest the accuracy of your personal information and we are working to verify the accuracy of your information
- We did not collect your information lawfully
- We no longer need your personal information, but you need us to keep it to establish, exercise or defend a legal claim
- You have objected (see “right to object”) to us using your personal information and we are considering whether our legitimate grounds override the nature of the objection.

We will not process your restricted information in any way except to store it, unless:

- You give your consent to continue processing it
- It is for the establishment, exercise or defence of a legal claim
- It is for the protection of the rights of another person (natural or legal), or
- It is for reasons of important public interest

You can make this request verbally or in writing. Where an erasure request is manifestly unfounded or excessive we may charge a fee or refuse to respond. Where we refuse to respond we will explain why and you have the right to complain to the Information Commissioner’s Office.

• **Right to object:** You have the right to object to:

- Processing based on legitimate interests (see “The purpose of collecting your personal information and the lawful basis”) or the performance of a task in the public interest/exercise of official authority (including profiling);
- Direct marketing (including profiling); and
- Holding information for purposes of scientific/historical research and statistics.

You must have “grounds relating to your particular situation” in order to exercise your right to object to processing for research purposes. If we are conducting research where the processing of personal data is necessary for the performance of a public interest task, we are not required to comply with an objection to the processing.

• Right to object to processing our legitimate interests and the performance of a legal task: You have the right to object to:

- Processing based on legitimate interests (see “The purpose of collecting your personal information and the lawful basis”) or the performance of a task in the public interest/exercise of official authority (including profiling).

You must have an objection on “grounds relating to your particular situation”. We will stop processing your personal information unless:

- We can demonstrate compelling legitimate grounds for holding your information after considering your rights and expectations;
- It is for the establishment, exercise or defence of a legal claim.

• Right to object to direct marketing: You have the right object to direct marketing. We will stop processing your personal information purposes as soon as we receive an objection. There is no ground for exemption.

• **Right to data portability:** You have the right to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

The right to data portability only applies:

- to personal data an individual has provided to us;

- where the processing is based on the individual's consent or for the performance of a contract; and when processing is carried out by automated means.

We are only able to provide some personal information in CSV format and are unable to provide data portability for data outside this.

We will aim to provide this request within one month following the date of your request or three months if it is complex to provide it. If we are unable to meet your request we will explain why and you have the right to complain to the Information Commissioner's Office.

SECURITY

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

HOW TO CONTACT US

For data protection matters, you can contact us via post at First Floor 7 High Street, Lutterworth LE17 4AT, telephone 07850656081 and office email info.lmsd@gmail.com

HOW TO COMPLAIN

You can complain to us using our "How to contact us" details above. You also have the right to complain to the Information Commissioner's Office. It has enforcement powers and can investigate compliance with data protection law: ico.org.uk