

Hummingbird School of Dance - Privacy Policy

I. Introduction

Hummingbird School of Dance 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 2018 (GDPR).

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

II. Managing & Protecting your Data

What information does Hummingbird School of Dance hold about me?

The legislation requires that there is a clear legal basis for processing personal information. In general, Hummingbird School of Dance relies on the individual's consent in order to process their data. When you participate in or sign up to any Hummingbird School of Dance class, activity or workshop, we may collect and store personal information about you. Depending on how you contact us, this can consist of;

Personal information – any data that could be used to personally identify an individual, including full name of parent and child, postal address, telephone number and email address.

Sensitive information – including date of birth and medical information.

We do not hold data on religion, political opinions or sexual orientation.

By submitting your details, you enable us to provide you with products or services that you have selected.

When taking pictures of students in class or filming performances Hummingbird School of Dance ask for parental permission. Hummingbird School of Dance 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.

How do 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.

If we require your personal information for reasons other than those specified above, we shall 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.

Where is the information stored?

Hummingbird School of Dance collects a large amount of personal data every year including; names, email and addresses of those on the waiting list. 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 that have carefully controlled access, data encryption and password protection. Paper records are shredded if the child does not attend or added to the child's file and stored in a secure filing system.

Information about individual children is used in certain documents, such as weekly registers, 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 details. Any paper records are shredded after use, or after the relevant retention period.

Any printed documents containing personal information gathered by Hummingbird School of Dance used are transported in a locked file folder, accessible only by Hummingbird School of Dance teachers under the guidelines of GPDR. Members of staff may at times require access to these files, but any information taken from the files remain confidential and secure. These records are shredded after the retention period.

Hummingbird School of Dance securely stores personal data held visually in photographs or video clips or as sound recordings, and written consent has been obtained via the GDPR consent form.

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 could be a small security risk when disclosing information online.

In the event of a data breach, Hummingbird School of Dance will contact the relevant individuals within 72 hours, giving full details of the breach and the actions being taken to ensure it does not happen again. Whilst we will always do everything we can to protect your data in accordance with GDPR, we cannot accept responsibility for an illegal breach of our data systems, either physical or virtual, providing we have protected your data in accordance with the terms of this policy.

How long will you keep personal information?

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.

Should you leave Hummingbird School of Dance, your personal and sensitive data is only stored for a period of 1 year past current use. It will then be destroyed in a correct manner. We will store your GDPR consent form, which contains your name, child's name and email

address but no other personal or sensitive data. This information will be stored offline and will be encrypted and protected by password.

Should you have completed exams through the Royal Academy of Dance and/or Imperial Society of Teachers of Dance whilst at Hummingbird School of Dance we will store your exam results. These will contain the child's name, ID number (given by the examinations board), date of exam and result. This information will be stored offline and will be encrypted and protected by password.

Can I find out what personal information Hummingbird School of Dance 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 info@hummingbirddance.co.uk

Young User Information

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

Legal Obligation

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.

Hummingbird School of Dance 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.
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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. This website does NOT use cookies.

III. Hummingbird School of Dance 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.

Hummingbird School of Dance 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.

GDPR includes 7 rights for individuals

1) The right to be informed

Hummingbird School of Dance 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 special educational needs 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 workers, Hummingbird School of Dance is required to hold data on its Teachers; names, addresses, email addresses, telephone numbers, date of birth, National Insurance numbers, bank details and in some cases, photographic ID such as passport and driver's license. 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.

2) The right of access

At any point an individual can make a request relating to their data and Hummingbird School of Dance will need to provide a response (within 1 month). Hummingbird School of 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 Hummingbird School of Dance has a legal duty to keep children's and parent's details for a reasonable time, Hummingbird School of Dance retain these records for 1 year after leaving the dance school. Children's accident and injury records will be retained for 3 years, in line with Health and Safety.

Teacher's records must be kept for 6 years after the member of leaves, before they can be erased. This data is archived securely and shredded after the legal retention period.

4) The right to restrict processing

Parents, visitors and staff can object to Hummingbird School of 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

Hummingbird School of Dance requires data to be transferred from one IT system to another; such as from Hummingbird School of Dance to the Local Authority, for performance Body Of Persons Approval (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. Hummingbird School of Dance does not use personal data for such purposes.

GDPR means that Hummingbird School of 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
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Suppliers / 3rd parties - Use of "Data Processors"

Data processors are defined by GDPR as 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:

- Squarespace (Website host)
- Google Ltd (Gsuite, Adwords, Analytics)
- Royal Academy of Dance (RAD) – Examinations body.
- Imperial Society of Teachers of Dancing (ISTD) – Examinations body.
- Due Diligence Checking Ltd
- Richmond Council
- Facebook (Advertising)
- Instagram (Advertising)

Our data processors must attest that they also comply with all current legislation and GDPR.

Hummingbird School of Dance 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.

IV. Changes to this Privacy Policy

Hummingbird School of Dance has the discretion to update this privacy policy at any time. When we do, we will revise the updated date at the bottom of this page. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

Should you have any questions or comments regarding this Privacy Statement, please contact us directly:

Natasha Cale - Principal of Hummingbird School of Dance

E: info@hummingbirddance.co.uk

T: 07949112161

This policy was updated in May 2018 and signed on behalf of Hummingbird School of Dance.