

## **Privacy Statement**

We take safeguarding online privacy seriously. Please read the whole of this statement carefully as it sets out what information we may collect from you, how we may use it and your rights in respect of our use and the key details of our privacy policy.

From time to time, we may need to change our privacy policy because of changes in our organisation, legislation or in our attempts to serve your needs better. We will use reasonable efforts to publish any changes to our privacy statement.

The Hitchin School of Russian Ballet is responsible for collecting, processing, storing and safe-keeping personal and other information as part of providing a service and carrying out our regular business activities. We manage personal information in accordance with the Data Protection Act 2018

Any questions regarding our processing of personal data should be directed to us via email [hitchinrussianballet@outlook.com](mailto:hitchinrussianballet@outlook.com)

### **SCOPE**

Our Privacy Statement governs any kind of processing where we are acting as a data controller or co-controller (including collection, use, transfer, storage and deletion) of personally identifiable information (any information that may be used to identify a physical person, and any other information associated therewith) about natural persons. This statement applies to our processing of data collected through any means, actively as well as passively, from persons located anywhere in the world.

We are guided by the following principles when processing data:

1. We will only collect data for specific and specified purposes; we will make it clear at the point when we request your information, what we are collecting it for and how we are going to use it;
2. We will not collect data beyond what is necessary to accomplish those purposes; we will minimise the amount of information we collect from you to what we need to deliver the services required;
3. We will collect and use your personal information only if we have sensible business reasons for doing so, such as contacting you with relevant offers and services and from time to time with relevant coaching services.
4. We will not use your data for purposes other than those for which it was collected, accepted as stated within our policy, or with your prior consent;
5. We will seek to verify and/or update your data periodically and we will accept requests from you for amendment of the data held;

6. We will apply high technical standards to make our processing of data secure;
7. Except otherwise stated, we will not store data in identifiable form longer than is necessary to accomplish its purpose or as required by law.

## **INFORMATION COLLECTED**

We process personal information about prospective, current and past students and their parents, staff, contractors and suppliers. The information we process may be completed by you or us and may be written, images or video.

The information we may collect about you and/or your child could include, but is not limited to:

1. Names, addresses, telephone numbers, email addresses and other contact details;
2. Family details;
3. Health information including information relating to previous injuries;
4. Racial or ethnic origin;
5. Admissions information, academic, disciplinary and other education related records, information about special educational needs, examination scripts and marks;
6. Education and employment data;
7. Images, audio and video recordings;
8. Financial information (e.g. for bursary assessment or for fund-raising);

If we obtain special category data from you such as health, ethnicity, religion or biometric data (sensitive personal information) we will always get your explicit consent.

## **WHEN WE COLLECT DATA**

We will collect information from you when:

1. You enrol in classes;
2. You sign up to our newsletter or mailing list;
3. You contact us for information via our website or social media channels, by phone or email;
4. You post on our social media channels, website or blog;
5. You work with us in a commercial capacity.

We take care to protect personal information but may share the information with appropriate members of staff or class teachers (contractors) for the purposes that the information was provided.

We may also share information with examination boards. This is always subject to contractual assurances that personal data will be kept securely and in accordance with our specific directions.

## **USE OF PERSONAL DATA**

We may use the information collected to:

1. Allow you to process a booking for a class or purchase a product;
2. Provision of dance education to students, reporting on the same to parents or guardians and publishing results of achievements;
3. Safeguarding students' welfare;
4. Create a profile for you on our site;
5. Send you our newsletters or provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
6. Ensure that content from our site is presented to you in the most effective manner for you and your computer;
7. Promote the school through our website and other publications;
8. Allow you to participate in the service you have chosen to do so;
9. Notify you about changes to our service

## **INFORMATION STORAGE**

If you provide us with your email address it will be stored, along with your first name and surname via our database Membermeister <https://membermeister.com> who have their own privacy policy and will protect your data. You can find out more here: [info@membermeister.com](mailto:info@membermeister.com)

We will never sell or share your personal information with third parties.

## **LEGAL BASIS FOR PROCESSING YOUR DATA**

The General Data Protection Regulation (GDPR) provides that processing of your data shall only be lawful if and to the extent that at least one of the following applies:

1. You have consented
2. For the performance of a contract
3. For compliance with a legal obligation which we must perform
4. To protect vital interests of your or another person

5. It is in the public interest
6. It is in the legitimate interests pursued by us or a third party

We collect data for the purposes set out above. Data is managed to ensure that it is either erased from our system when it is no longer required for the purpose for which it was collected, retained for legal reasons or minimised and retained.

Any health data collected from you has special protection and is limited to that permissible by law.

### **LINKS FROM OUR SITE**

Our site contains links to and from other websites which are operated by individuals and companies over which we have no direct control. If you follow a link to any of these websites, please note that these websites have their own privacy and terms of use policies. We do not accept any responsibility or liability for these policies. We advise you to check the policies for third party sites before you submit any personal data to the website.

### **MARKETING EMAILS**

We will make it as easy as we can for you to opt out of unwanted processing, providing it does not restrict our ability to provide you with the primary service you have requested.

Please note if you wish to unsubscribe from any marketing emails that you have signed up for, you can do so by emailing [hitchinrussianballet@outlook.com](mailto:hitchinrussianballet@outlook.com). It may take 24 hours for this to become effective.

### **WEBSITE ANALYTICS & TARGETED MARKETING**

We use website analytics to provide the best user experience and service to you and to evaluate and improve our site. We utilise third party data analytics service providers, google analytics to improve our visibility and to monitor website browser behaviour and navigation across our site.

These third-party data analytics service providers collect this information on our behalf in accordance with our instructions and in line with their own privacy policies. Our service providers may collect the following data about the way you use our site, which will almost always be anonymised and aggregated before reporting back to us:

1. Number of visitors to our site
2. Pages visited whilst using the site and time spent per page
3. Page interaction information, such as scrolling, clicks and browsing methods
4. Source location and details about where users go when they leave the site
5. Page response times and any download errors
6. Other technical information relating to end user device, such as IP address or browser plug-in

From time to time, we may use the information collected about you to present you with targeted advertisements using platforms such as Facebook, Twitter, Google and/or Instagram.

#### **CHANGES TO OUR POLICY & FUTURE PROCESSING**

We do not intend to process your personal information except for the reasons stated within this privacy notice. If this changes, this privacy notice will be amended and placed on our website at [www.hitchinrussianballet.co.uk](http://www.hitchinrussianballet.co.uk)

#### **POLICY DETAILS**

We continually review our privacy practices and may change our policy and privacy statement from time to time. When we do this an amended privacy statement will be placed on our website at [www.hitchinrussianballet.co.uk](http://www.hitchinrussianballet.co.uk)

This privacy notice was published on 10<sup>th</sup> march 2019 and last updated on 1<sup>st</sup> April 2021

If you are concerned about how we are collecting, using and/or sharing your personal information, you can contact our Data Protection Officer [hitchinrussianballet@outlook.com](mailto:hitchinrussianballet@outlook.com)