# **GDPR PRIVACY POLICY**



# This Policy is in compliance with GDPR.

## 1. Our Approach

Centre Stage Dance and Drama Ltd (CSDD) is committed to protecting your privacy. This Privacy Policy explains (a) how we process the personal information we collect about you, (b) how you can instruct us if you prefer to limit the use of that information and (c) what procedures we have in place to safeguard your privacy.

If you have any questions about this policy or would like any further information please email us at <u>contact@centrestagedanceanddrama.com</u>

## 2. What Information Do We Collect

Personal data means any information relating to a person who can be identified either directly or indirectly. It may include name, date of birth, address, phone number, email address and IP address.

We will use, store or otherwise process any of your Personal Data in accordance with the terms of this Policy, including but not limited to, your name, date of birth, address, phone number and email address and any other Personal Data collected on your registration form with CSDD, to the extent reasonably necessary to provide the offerings that are available to you by us.

You may give us information about yourself when you complete a "contact us" form on our website. This may include your name, email address, phone number and any other additional information that you may choose to provide to us.

## **3. Special Category Data**

We may process Special Category Data where we would require certain medical data to formulae emergency procedures (if required) and to ensure that any health and safety needs are covered.

# 4. Children's Data

CSDD's registration and contact forms are not intended for children to complete. If you are under 18 years of age and you provide us with information on one of these forms your parent(s)/guardian(s) must give their permission.

CSDD will take steps to ensure that there is an enhanced level of data protection when processing children's personal data.

## 5. How We Will Use Your Personal Data

We will only process your Personal Data, in accordance with applicable law, for the following purposes:

- Internal record keeping.
- Dealing with your enquiries and requests.
- Personalising your interaction with us.
- Resolving any disputes.
- To comply with applicable law.
- Communicating important information or updates.
- Booking examinations, festivals or events.
- For use in emergency.
- Invoicing.

We will take reasonable steps to ensure the Personal Data that we store is accurate, complete and upto-date.

#### 6. Grounds For Processing

To process your Personal Data lawfully we need to rely on one or more valid legal grounds. The grounds we may rely upon include:

- Your consent to particular processing activities.

- Our legitimate interests as an organisation (except where your interests or fundamental rights override this), for example, it is within our legitimate interest to use your Personal Data to prevent or detect fraud.
- Our compliance with a legal obligation to which CSDD is subject, for example, we have a duty to investigate and respond to complaints made against us and may need to process your Personal Data as part of such investigation.
- To process Special Category Data lawfully we need to rely upon different grounds to those that are relevant for Personal Data. We will only process Special Category Dara with your explicit consent to the processing. For example, where you have consented to us disclosing details about your health for examinations.

## 7. Information For Marketing Purposes

Where you have consented to us using your Personal Data for marketing purposes, we may use your information to send you information about our website, updates and news concerning CSDD and information about our offerings.

We will continue to use and disclose your Personal Data in accordance with this Policy (as amended from time to time) and as permitted by law. However, if at any time after you have consented to us using your Personal Data for marketing purposes and you wish us to stop using your information for these purposes, please contact us in writing via email at <u>contact@centrestagedanceanddrama.com</u>

## **8. Information Security**

The Internet is not a secure medium. However, we have put in place various security procedures as set out in this Policy.

Please be aware that communication over the Internet, such as emails and messages are not secure unless they have been encrypted. Your communication may route through a number of countries before being delivered - this is the nature of the Internet. We cannot accept responsibility for any unauthorised access or loss of Personal Data that is beyond our control.

We believe that we have appropriate policies, rules and technical measures to protect the Personal Data that we have under our control from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction of accidental loss.

## 9. Disclosure Of Your Personal Information

There are circumstances where we may wish to disclose or are compelled to disclose your Personal Data to third parties. This will only take place in accordance with the applicable law and for the purposes listed below. These scenarios include disclosure:

- To our teachers, volunteers and anyone who works on behalf of CSDD.
- To our successors in title to our activities.
- To our auditors.
- To third party service providers and consultants in order to protect the security or integrity of our organisation, including our databases and systems and for business continuity reasons.
- To another legal entity, on a temporary or permanent basis, for the purposes of a joint venture, collaboration, merger, sale, reorganisation, change of legal form, dissolution or similar event. In the case of a merger or sale, your Personal Data will be permanently transferred to a successor.
- To legal advisors who may need to advise, manage or litigate a claim.
- To public authorities or other third parties where we are required by law to do so.
- To any other third party where you have provided your consent.

# 10. International Transfer of Personal Data

We may transfer your Personal Data to a third party in countries outside the EU for further processing in accordance with the purposes set out in this Policy. In particular, your Personal Data may be transferred to our outsourced service providers located abroad. In these circumstances, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, organisation contractual or other lawful means.

We may disclose your information to any person as required by law and specifically to any government agency if we believe in good faith that we must do so to comply with the law or that doing so is required to prevent, detect, investigate or remedy improper conduct potentially affecting CSDD.

## **11. Retention Of Personal Data**

Your Personal Data will be retained for as long as it is necessary to carry out the purposes set out in this Policy (unless longer retention is required by applicable law). However, we will nor retain any of your Personal Data beyond this period and the retention of your Personal Data will be subject to periodic review. We may keep an anonymised form of your Personal Data, which will no longer refer to you, for statistical purposes without time limits, to the extent that we have a legitimate and lawful interest in doing so.

#### **12. Your Rights In Relation To Your Information**

Data protection law provides you with certain rights, including the right to access, rectify, withdraw consent, erase, restrict, transport, and object to the processing of your Personal Data. You also have the right to lodge a complain with the relevant data protection authority if you believe your Personal Data is not being processed in accordance with applicable data protection law. Further information about your rights is set out below:

- Right to make subject access request (SAR). You may, where permitted by applicable law, request copies of your Personal Data. If you would like to make a SAR ie. request for copies of the Personal Data we hold about you, you may do so by contacting us at <u>contact@centrestagedanceanddrama.com</u>. The request should make clear that a SAR is being made. Please quote your name and address. We should be grateful if you would also provide brief details of the information of which you would like a copy or which you would like to be corrected. This helps us to more readily locate your data. We will require proof of your identity before providing you with details of any Personal Data we may hold about you.
- Right to rectification. You may request we rectify any inaccurate and/or any incomplete Personal Data.
- Right to withdraw consent. You may, as permitted by applicable law, withdraw your consent to the processing of your Personal Data at any time. Such withdrawal will not affect the lawfulness of processing based on your previous consent. Please note that if you withdraw your consent, you may not be able to benefit certain service features for which the processing of your Personal Data is essential.
- Right to object to processing. You may, as permitted by applicable law, request that we stop processing your Personal Data.
- Right to erasure. You may request that we erase your Personal Data and we will comply, unless there is a lawful reason for not doing so.
- Your right to lodge a complaint. We suggest that you contact us about any questions or if you have a complaint in relation to how we process your Personal Data. However, you do have the right to contact the relevant authority directly.

13. Cookies

Our website uses cookies - for more information, please see our cookie consent banner on our website which describes the cookies we may use and send to your computer or mobile device, as well as how you can adjust your cookie settings.

#### **14. Linked Websites**

We are not responsible for the privacy policies and practices of other websites even if you accessed the third party website using links from our Website. We recommend that you check the policy of each website you visit before deciding whether to proceed and contact the owner or operator of such website if you have concerns or questions.

#### **15. Third Parties**

Where you submit information on behalf of another person, you confirm that you have made that person aware of how we may collect, use and disclose their Personal Data, the reason you have provided it, how they can contact us, the terms of this Policy and that they have consented to such collection, use and disclosure.

#### **16. Compliance With Privacy Laws**

CSDD complies with the data protection and privacy laws to which it is subject. You should satisfy yourself that you are familiar with those laws, including any exceptions which may apply under them. You should also be aware that privacy laws in various jurisdictions may change from time to time.

#### 17. Changes To This Policy

We reserve the right to amend or modify this Policy, without notice to you and if we do so, we will post the changes on this page. It is your responsibility to check our Policy each time for any changes.

The information on this page was last updated on Friday 1st January 2021.