

Alloa Ballet Company: Confidentiality and Data Protection Policy
Incorporating

The Data Protection Act 1998 (UK)

The European Union General Data Protection Regulation (EU GDPR)

Our Website Privacy and Cookie Policy: <http://www.alloaballetcompany.co.uk/website-privacy-and-cookie-policy>

About the Data Protection Act 1998 (UK)

The Data Protection Act 1998 came into force on 1 March 2000 and the full provisions of the Act came into force on 24 October 2001.

About EU GDPR

On May 25, 2018 the European Union (EU) implemented the General Data Protection Regulation (GDPR) (Regulation (UE) 2016/679). This regulation is intended to strengthen and unify data protection for all individuals within the EU and addresses the export of personal data outside the EU.

To comply with the new regulations we, (Alloa Ballet Company), must inform you of the personal data we hold, why we hold it, who we share it with, where it is stored.

Your explicit permission is required.

You can opt-in or opt-out via our online parent portal,

If you opt-out, regrettably, you may be unable to access some or all of Our Services.

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

“Data” means collectively all information that you submit to Alloa Ballet Company. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998 (UK) and the European Union General Data Protection Regulation (EU GDPR);

“Service/Services” means in-person services provided by Alloa Ballet Company, such as dance tuition, classes, examinations, performances; digital services provided via Our Website and our Online Parent Portal, such as information, communication facilities and email newsletters; payment services offered by Stripe and Paypal and the management of those services.

“User/Visitor/You/Your/Pupil/Student” means any third party that accesses Our Services &/or Our Website and is not employed by or contracted to Alloa Ballet Company and acting in the course of their employment;

“Website/Site” means the website [alloaballetcompany.co.uk](http://www.alloaballetcompany.co.uk) and any sub-domains of the Site unless expressly excluded by their own terms and conditions; and

“We/Us/Our” means Alloa Ballet Company

“Staff” means Our employees and specific contractors, such as regular class teachers.

2. Scope of this Policy

This Policy applies only to the actions of Alloa Ballet Company and Users with respect to Services.

3. Data Collected and Held

Alloa Ballet Company is committed to ensuring that the collection and processing of personal data is only undertaken in the legitimate operation of Our business. We collect and use the following Data for legitimate purposes only and Data is not disclosed to any third party unlawfully.

PARTICIPANTS AND CUSTOMERS

How ALLOA BALLET COMPANY collect personal data:

Alloa Ballet Company customers and participants supply their personal data when signing up for classes through our registration form either via the website, or via paper form.

This is either completed by a parent/guardian or the child themselves if they deemed able to do so.

Personal data may also come to us unsolicited via enquiries through our website and to our generic email account.

Why Alloa Ballet Company collect personal data:

To attend any of Alloa Ballet Company's activities participants/parents/guardians must agree to some processing of their personal data. This is due to Legitimate Interests - GDPR Article 6(1)(f), Legal Obligation GDPR Article 6(1)(c), Contract - Article 6(1)(b) and/or Consent - Article 6(1)(a).

Should Alloa Ballet Company be unable to process participant's data, we would be contravening both our Health & Safety and Child Safeguarding policies. We would also be ignoring best practice regarding working with children/vulnerable adults.

Our participants must remain safe at all times, therefore information about participants must be collected in order to create registers and accurate student records. This information is also used to provide students with appropriate classes, including dividing students into age groups.

Special category data is only collected with the consent of the data subject. Special category data Alloa Ballet Company collects includes but is not limited to: Medical/Disability information, Gender and Sexuality.

As physical activity providers it is essential that this consent is given should a participant have any medical/disability needs. This allows us to incorporate participants safely into classes. It is also used in assessing if we can incorporate participants safely into classes.

We do NOT collect or store financial information such as credit/debit card numbers. However these can be collected by Stripe if you decide to pay for services online using our Parent Portal

Without limitation, any of the following Data may be collected:

3.1 PERSONAL DATA:

3.1.1 name and child/ren's name (if provided by you);

3.1.2 your &/or your and child/ren's date of birth &/or age (if provided by you);

3.1.3 contact information such as email addresses, postal addresses and telephone numbers (if provided by you);

3.1.4 School/Educational Institution

3.1.5 your messages (if provided by you);

3.1.6 your feedback and reviews (if provided by you);

3.1.7 photos and videos (if permission is given by you);

Alloa Ballet Company often use footage/photos used from shows, performances and classes for marketing purposes both in print media and the website. Participants/their Parent and/or Guardians may choose if they do not wish themselves/their child to be depicted.

Some attendees at events may film/take photos for their own personal use (e.g. parents of other participants). Participants/their Parent and/or Guardians may choose if they do not wish themselves/their child to be depicted.

Social Media:

Alloa Ballet Company regularly share photos/videos of students in workshops, events and performances through social media platforms including; Instagram, Facebook and Email. These will never be shared with any identifying information (age, location etc.). There may be times where we will share first names, but only with the explicit consent of the parents.

3.1.8 gender identity (if provided by you);

3.1.9 invoice payments;

3.2 Non-personally-identifiable data collected via Our Website:

3.2.1 IP address (automatically collected);

3.2.2 web browser type and version (automatically collected);

3.2.3 operating system (automatically collected);

3.2.4 a list of URLs starting with a referring site, and the site you exit to (automatically collected);
and

3.2.5 your activity on our Website (automatically collected);

3.3 SENSITIVE DATA:

3.3.1 health, medical (such as allergies) or learning support requirements, if provided by you – please note this is only collected online via our secure parent portal, not via our website, and you may use alternative means to submit such data.

No personally-identifiable information is used when:
ordering uniform, dancewear, costume and dance shoes;
or when sharing photos on our website or on social media,

3.4 In addition to choosing what Data you share, you may choose the WAY in which you share Data with us. Data is collected via:

Paper forms and methods

Digital forms and methods

Email

Secure online forms via our Online Parent Portal

Please also refer to our Website Privacy and Cookie Policy: <http://www.alloaballetcompany.co.uk/privacy-and-cookie-policy>.

4. Our Use of Data – Why We Hold Personal Data

4.1 Alloa Ballet Company Data users must comply with the eight Data Protection Principles:

Personal data shall be processed fairly and lawfully.

Personal data shall be held only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or purposes.

Personal data shall be adequate, relevant and not excessive in relation to the purpose for which it is processed.

Personal data shall be accurate and where necessary kept up to date.

Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose.

Personal data shall be processed in accordance with the rights of data subject under the DPA. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of the data.

Personal data shall not be transferred to a country or a territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

4.1.1 Any personal Data you submit will be retained by Alloa Ballet Company.

4.1.2 Data provided by Users will NOT be sold to third parties.

4.2 Unless we are obliged or permitted by law to do so, and subject to Clause 5, your personal Data will NOT be disclosed to third parties.

4.3 All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see Clause 11 below.

4.4 Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Services. Specifically, Data may be used by us for the following reasons:

4.4.1 internal record keeping;

4.4.2 improvement of our products/services;

4.4.3 transmission by email or post of information regarding your use of Our Services;

4.4.4 transmission by email or post of promotional materials that may be of interest to you;

4.4.5 contact for market research purposes which may be done using email;

4.4.6 illustrate, customise or update Our Services.

4.5 With your permission, photographs and videos of our Pupils, Students and Service Users are used for illustrative purposes on our website and may be used on our social media channels and marketing materials.

4.5.1 Photographs and videos of Pupils and Service Users under 18 will NOT have their names or other personally-identifiable data attached;

4.5.2 Photographs and videos of Students and Service Users over 18 will NOT have their names attached.

5. Sharing Your Data and Third-Party Services

5.1 Alloa Ballet Company may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to:

5.1.1 Website use;

5.1.2 search engine facilities;

5.1.3 communications and newsletter transmission;

5.1.4 advertising and marketing;

5.1.5 feedback and reviews;

5.1.6 Service use.

Excluding our secure parent portal (if health/medical data is provided by you via email), the providers of such services do NOT have access to sensitive Data provided by Users of Our services.

Third-party providers MAY have access to some personal Data provided by Users of Our services.

5.2 Third-Party providers for in-person Service use include:

5.2.1 Examination Boards:

ROYAL ACADEMY OF DANCE (RAD) [Privacy Policy](#)

INSTITUTE OF TEACHERS OF DANCE (ISTD) [Privacy Policy](#)

5.2.2 service providers:

Squarespace (website hosting platform) [Privacy Policy](#)

Google (blank forms and marketing files): [Policies](#);

Dance Studio Pro (email, newsletters, digital registration forms) [Privacy Policy](#)

Stripe (online platform for online payments) [Privacy Policy](#)

Mailchimp(marketing emails and newsletter) [Privacy Policy](#)

5.3 We may share personal and sensitive Data with Alloa Ballet Company employees and teachers.

A non-exhaustive list of further Third-Party providers, including digital Service use, and first-party Cookies use is within Clause 12 of Our Website Privacy and Cookie Policy.

6. Confidentiality

6.1 PUPILS:

6.1.1 Subject to Clauses 4, 5 and 3.4, Pupils' personal and sensitive Data are confidential information and will not be shared in full with anyone apart from the Director, the Administrator and the appropriate teachers.

6.1.2 Subject to Clauses 4 and 5, some personally-identifiable Data may need to be shared, for example, for the purpose of examinations we must share a Pupil's name and date of birth for an Identification Number to be issued.

6.1.3 A register is taken at the start of each class and a record is kept of attendance.

6.1.4 Where applicable, Pupil examination certificates are recorded.

6.2 ALL SERVICE USERS:

6.2.1 Subject to Clauses 4 and 3.4, if a Pupil, Student, or Service User gives Us information of a sensitive &/or confidential nature, this will be kept confidential. Staff will not assume that the information has been passed on to other members of Staff and will encourage the Pupil, Student, or Service User to allow the information to be passed on to the appropriate person, such as a member of Staff, Parent/Guardian, or medical professional.

6.2.2 Subject to Clause 4, when a Pupil, Student or Service User ends leaves the School permanently they will not be included in the next term's registers/database.

7. Where We Store Data

Subject to Clauses 4, 5 and 3.4, personal Data is kept on the online parent portal and is not available to anyone other than the Director, the Administrator and appropriate teacher.

8. Controlling Use of Your Data

8.1 Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:

8.1.1 use of Data for direct marketing purposes;

8.1.2 sharing Data with third parties; and

8.1.3 taking photographs and video footage (see Clause 4).

9. Your Right to Withhold Information

9.1 You may access certain areas of Our Website and some of Our Services (such as our “Drop In” classes) without providing any Data at all. However, to use all features and functions available on the Website and fully use Our services, you may be required to submit certain Data.

9.2 You may restrict your internet browser’s use of Cookies. For more information see Clause 12 of our Website Privacy and Cookie Policy.

9.3 Your explicit permission is required.

9.3.1 You can opt-in or opt-out via our online registration portal.

9.3.2 You may “opt-out” of providing certain Data. If you opt-out, regrettably, you may be unable to access some or all of Our Services.

9.4 You may unsubscribe from Our mailing list at any time.

9.5 You may request your Data is rectified, restricted, blocked, erased or destroyed.

9.6 You may notify us of any change in Data permissions, for example, you may request photographs and videos to be removed from the Website by contacting Heather Shrimpton lovetodance@sky.com

10. Your Right to Access Your Own Data

You have the right to ask for a copy of any of your personal Data held by Alloa Ballet Company (where such data is held) on payment of a small fee which will not exceed £10 (the statutory maximum).

11. Security

11.1 Data security is of great importance to Alloa Ballet Company and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected.

11.2 You acknowledge it is impossible to construct “perfect internet security”. We have appropriate security measures in place and many of our third-party providers, such as our email service providers, use encryption.

12. Cookies

Please refer to Clause 12 of our Website Privacy and Cookie Policy.

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