

Privacy Notice

Who are we?

We are The School of Ballet Theatre UK, registered The School of Ballet Theatre UK Limited, Company No.11378552. We are the data controller for the purposes of the General Data Protection Regulation (EU 2016/679) and the UK Data Protection Act 2018. Our registered address is Leicestershire House, The Borough, Hinckley, Leicestershire, LE10 1NL.

Responsibility for Data Protection

The School has appointed Beth Randle as the Head of Compliance and Data Protection who will deal with all your requests and enquiries concerning the school's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. Julie Phayre can be contacted via email at Julie.Phayre@BTUKschool.com.

Why the School Needs to Process Personal Data

The school needs to process a wide range of personal data about individuals as part of its operation. By disclosing your personal information to us via btukschool.com, by phone or in writing, you are giving us your consent to collect, store and process your personal information in the manner described in this Notice. The information we hold will be accurate and up-to-date within our knowledge.

We will use the information to:

- Maintain relationships with alumni, patrons and governors including any other interested parties, including marketing or development activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background
- Process sales transactions, donations or other payments
- Fulfil your requests such as applications, donations requests for further information
- Identify Visitors and contributors
- Carry out research on the demographics, interests and behaviour of our users and supporters to help us gain a better of understanding of them and to enable us to improve our service.

This research is carried out internally, never by third parties.

What this Privacy Notice is for

This policy is intended to provide information about how the school will use (or "process") personal data about individuals. This information is provided because Data Protection Law gives individuals rights to understand how their data is used. This Privacy Notice applies alongside any other information the school may provide about a particular use of personal data. This Privacy Notice also applies in addition to the school's other relevant terms and conditions and policies.

As we are also a registered charity, we fundraise from individuals, companies, public bodies

and private trusts and foundations. This includes approaching those who want to support us. Fundraising also helps to ensure the financial viability of our school for bursaries and development projects.

Types of Personal Data Processed by The School

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- bank details and other financial information for those who donate money to the school and apply for Means Tested Funding;
- Gift Aid Status;
- potential for business and work details

How the School Collects Data

We collect and store personal and non-personal data that you may volunteer as part of registering, attending any Events by The School of Ballet Theatre UK, auditioning or via donation forms, newsletter sign ups or in connection with a specific project or event. However in some cases personal data may be supplied by third parties (for example another parent, or member of staff) but this will only be where you have indicated an interest in the school and its activities and on first contact with you we will ask for your consent to continue to contact you.

Who has Access to Personal Data and Who The School Shares it With

Occasionally, and in line with Data Protection Law, the school will need to share personal information relating to its community with third parties for processing, such as:

MailChimp: to deliver our e-newsletters. By signing up to our e-newsletter you acknowledge that the information you provide will be transferred to MailChimp for processing in accordance with their <u>Privacy Policy</u> and <u>Terms</u>. We gather statistics around email opening and clicks using industry standard technologies to help us to monitor and improve our e-newsletters. You will stay subscribed, unless you unsubscribe, which you can do at any time by clicking 'unsubscribe' in the footer of each email. However, within any 24 month period, we may ask *inactive* subscribers to reconfirm consent.

Eventbrite: for online ticketing and registration for events (including workshops, masterclasses, Open Days and a range of events or activities). The School only collects and stores your personal information in order to register and facilitate your attendance at the 'event' and to request feedback post-event. We will not use your personal information for marketing and communications purposes unless you have expressly opted in to receive ongoing marketing materials or have sign up for an e-newsletter.

My Attendance Tracker: used as a database system for all our students' and parents' details. We use this software to, record and monitor attendance and log emergency contact details. We will not use your personal information for marketing and communications purposes.

IT systems, web developers or cloud storage providers: This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions.

For the most part, personal data collected by the school will remain within the school and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). While we cannot ensure or guarantee that loss, misuse, or alteration of data will not occur when it is under our control, we use our best efforts to try to prevent this.

Unfortunately, the transmission of data across the internet is not completely secure and while we do our best to try to protect the security of your information we cannot ensure or guarantee that loss, misuse or alteration of data will not occur while data is being transferred.

How Long we Keep Personal Data

The school will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact Beth Randle. However, please bear in mind that the school will often have lawful and necessary reasons to hold on to some personal data even following such request. A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record"). For information regarding retention periods please email the school on info@btukschool.com.

Keeping in Touch and Supporting The School

Where you have shared your details with us, the school will use your contact details to keep you updated about the activities of the school, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post.

Unless the relevant individual objects, the school will also:

Contact individuals, parents and/or alumni by post and email in order to promote and raise funds for the school [and, where appropriate, other worthy causes];

Should you wish to limit or object to any such use, or would like further information about them, please contact the School in writing.

You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the school is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

Your Rights

Rights of access, etc.

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the school, and in some cases ask for it to be erased or amended or have it transferred to others, or for the school to stop processing it – but subject to certain exemptions and limitations. If you wish to access your personal data, or wish it to be transferred to another person or organisation, or have an objection to how

your personal data is used, please send your request in writing to Julie Phayre, Julie.Phayre@btukschool.com

The school will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information). The school will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the school may ask you to reconsider, or require a proportionate fee, where Data Protection Law allows it.

Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further below), or information which is subject to legal privilege (for example legal advice given to or sought by the school, or documents prepared in connection with a legal action). You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

Consent

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Examples where we do rely on consent are: certain types of uses of images, certain types of fundraising activity, subscribing to Newsletters. Please be aware however that the school may not be relying on consent but have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates

Data Accuracy and Security

The school will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify info@btukschool.com of any changes to information held about them. You have the right to request that any out-of-date, irrelevant, inaccurate information or any other data about you, is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the school may need to process your data, of who you may contact if you disagree. The school will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

Queries and Complaints

Any comments or queries on this policy should be directed to Julie Phayre on Julie. Phayre@btukschool.com We will endeavour to ensure that all personal data is processed in compliance with this notice and the principles of the Data Protection Acts 1998, and the recent Data Protection Regulation Act (GDPR). If you believe that this policy has not been complied with or acted otherwise than in accordance with Data Protection Law, they should utilise the school complaints procedure and should also notify Beth Randle. The school can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator.