

GAYNA BROWN SCHOOL OF DANCING

GDPR (General Data Protection Regulation) Policy

Statement

GDPR stands for General Data Protection Regulation and replaced the 1995 Data Protection Directive. It was approved by the EU Parliament in 2016 and came into effect on 25th May 2018.

GDPR requires personal data to be processed fairly and lawfully and should only be collected for specified, explicit and legitimate purposes. This data should not be processed without the individual's knowledge and explicit consent. As such, Gayna Brown School of Dancing (GBSD) is committed to protecting the rights of children's and parents' personal data.

The GDPR provides the following rights for individuals:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing.
- The right to data portability.
- The right to object.
- Rights in relation to automated decision making and profiling.

The Right to be informed

This concerns the provision to individuals of clear and concise information about what the GBSD does with their personal data. This is called 'privacy information'. If this information is not already known to the individual, it must be provided within one month of receiving the data from that individual.

Gayna Brown School of Dancing is a registered Dance Provider with the Royal Academy of Dance and the Imperial Society of Teachers of Dance and is, therefore, required to collect and manage certain personal data:-

Parents – Names, address, telephone number(s) and e.mail address(es).

The right to erasure

Individuals have the right to request the deletion of their data in writing or verbally. This is known as 'the right to be forgotten'. GDPR requires this to be replied to as soon as possible but specifically within one month. In the vast majority of cases there will be no fee for carrying out this request.

The right to erasure is not absolute and applies only in certain circumstances. There are, for instance, legal obligations for the retention of records in which case the request will be refused. Erasure will occur after statutory periods have been met.

If a request for rectification is refused, the individual will be advised of the reasons and / or fee if applicable. They will also be informed of their rights of complaint and enforcement of their rights.

The right to restrict processing

Individuals have the right to request the restriction or suppression of their personal data in writing or verbally. This is not an absolute right. GDPR requires this request to be replied to as soon as possible but specifically within one month. In the vast majority of cases there will be no fee for carrying out this request.

The right to restrict processing means that data will continue to be stored but not used.

While the request is being reviewed, an individual's personal data will be made unavailable and / or removed from websites. The Individual will be advised before the restriction is lifted with reasons for refusal being given.

If a request to restrict processing is refused without a review period, the individual will be advised of the reasons and / or fee if applicable. They will also be informed of their rights of complaint and enforcement of their rights.

The right to data portability

Individuals have the right to request, verbally or in writing, the transfer of their own personal data to themselves or to another party by secure IT means. Once the information has been securely transferred, the GBSD is not responsible for subsequent processing. GDPR requires this to be actioned as soon as possible but specifically within one month. In the vast majority of cases there will be no fee for carrying out this request.

If a request to transfer personal data is refused, the individual will be advised of the reasons and / or fee if applicable. They will also be informed of their rights of complaint and enforcement of their rights.

If personal data is transmitted to the GBSD as part of a data portability request, it will be processed in line with data protection requirements. Information that is not required will be deleted immediately.

Specifically, the GBSD will transfer personal data by secure file transfer systems to Dance Associations for examination entries.

Children – Full Name, address, date of birth, School and Special Educational Needs requirements, allergies / illnesses.

The GBSD stores personal data in a filing cabinet at its home address and only uses this data as follows:

- for contacting parents or nominated person(s)
- for examination entries with parents' consent, in which case it is transferred to the Royal Academy of Dance and / or the Imperial Society of Teachers of Dance by secure electronic file transfer
- for marketing / advertising with parents' consent
- for displaying exam results with parents' consent
- for issuing to the relevant Council, with parents' consent, as part of the required documentation to advise of a Public Display / Show

For the avoidance of doubt, the GBSD does not give personal data to other third parties than noted above.

The right of access

Individuals can, at any time, make a request verbally or in writing to access their personal data. GDPR requires this to be replied to as soon as possible but specifically within one month. Information will be sent to the individual by electronic transfer unless the individual requests otherwise. In the vast majority of cases there will be no fee for the provision of this information.

A request can be refused in which case the individual will be advised of the reasons and / or fee if applicable. They will also be informed of their rights of complaint and enforcement of their rights.

The right to rectification

Individuals can, at any time, make a request, verbally or in writing, for their personal data to be rectified or completed. GDPR requires this to be replied to as soon as possible but specifically within one month. In the vast majority of cases there will be no fee for carrying out this request.

Processing of Information under review will be restricted.

The individual will be informed if the information is found to be accurate, the reasons for the decision and their rights of complaint and enforcement of their rights.

A request for rectification can be refused without review in which case the individual will be advised of the reasons and / or fee if applicable. They will also be informed of their rights of complaint and enforcement of their rights.

The right to object

Individuals have the absolute right to stop their data being used for direct marketing, giving reasons for this objection.

As such the GDPR gives individuals the right to object, verbally or in writing, to the processing of their personal data in certain circumstances.

GDPR requires this to be actioned as soon as possible but specifically within one month. In the vast majority of cases there will be no fee for carrying out this request.

Individuals will be informed of their right to object before material is published. On receipt of an objection, data will stop being processed.

If the right to object is refused and processing continues, the individual will be advised as such, giving reasons for the decision and / or fee if applicable. They will also be informed of their rights of complaint and enforcement of their rights.

GBSD does, from time to time, send out marketing material relating to the school and its pupils. Those individuals mentioned in this material will be advised before release of the same.

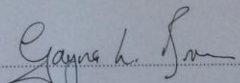
Rights in relation to automated decision making and profiling

This occurs when decisions and profiling are carried out solely by automated means without human involvement.

The Gayna Brown School of Dancing does not use personal data for these purposes.

Review of Document

This document will be reviewed and updated if required in June 2019


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Gayna Brown

Date: 24th May 2018

Gayna Brown School of Dancing