

# DATA PROTECTION POLICY

Updated August 2024

Aigburth Theatre School (ATS) complies with General Data Protection Regulation (UK GDPR) and the Data Protection Act of 2018.

ATS agrees to:

1. Be open and honest with all service users from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

2. Seek advice if in any doubt about how to use information, without disclosing the identity of the person where possible.

3. Where possible, share with consent and respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.

4. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.

5. Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

6. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

7. Ensure the school's 'Privacy Notice' is freely available to all new members.

8. Audit the Data Protection Policy and Privacy Notice annually.

### PRIVACY NOTICE

This privacy notice explains how and why we Aigburth Theatre School (ATS) process your personal data under the General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

It tells you what ATS may do with your personal information when you join us or use one of our services.

This has been created to guide staff, students, parents, carers or guardians. If you have any questions or concerns, please email: <u>info@aigburththeatreschool.co.uk</u>

### Who we are

The Aigburth Theatre School (ATS) acts as the data controller for the purpose of Data Protection Law.

## When do we collect personal data?

We collect personal data when you:

- Join our school as a parent or carer
- Join our school as a student
- Join our school as a teacher
- Book one of our events, holiday camps, courses or performances
- Sign up to our e-newsletter
- Respond to a survey or online form
- Visit us and/or speak to a member of staff or a volunteer

The term 'personal data' is any information relating to an individual.

We only process data containing personal information for the purposes of: staff administration (including payroll); accounts; records; advertising, marketing and public relations in connection with ATS.

We collect and use personal data in order to give our members the best possible experience of ATS. We are committed to being honest and respectful in collecting and using all personal data.

### What personal data do we collect?

The type of information we collect depends on the reason for your relationship with us.

We may collect and hold:

- your full name
- your contact information including email address, telephone number and postal address
- your contact preferences
- relevant medical information to ensure we can meet health and well-being needs
- financial information
- transaction and order details
- demographic information

- still and moving images taken during your visit
- other information relating to surveys or feedback
- alumni information including photographic images taken during your training here at ATS

We do not collect special category personal data from our members relating to health, race, religious beliefs and political opinions unless there is a clear reason for doing so, such as protecting children from harm, or providing additional access requirements at an event, course or performance. We only use this information to ensure we provide the best possible level of service.

### How we may use your personal data?

We always endeavour to be fair and transparent with how we use your information and ensure at all times that your information is protected.

The personal data you provide may be used:

- to provide a service or fulfil a purchase
- to process payments by debit/credit card or by setting up direct debits
- for fundraising purposes
- for alumni purposes
- to invite you to participate in relevant surveys
- for marketing purposes when specific consent has been given
- to better understand your preferences in order to tailor our communications to suit your interests
- to analyse and improve the services we may provide
- to act in accordance with the ATS Safeguarding Policy

We will not hold more information than required and will ensure all personal data held is kept up to date and used only for its specific purpose(s) outlined above. The retention policy will vary according to the purpose and may be contingent on circumstances when required to keep the data on the grounds of legal obligation and legitimate interest. Please email info@aigburththeatreschool.co.uk for further information on how long we may keep your data.

We will not sell, rent, trade or distribute your personal data to any third parties for marketing purposes unless we have received your prior permission to do so. Data may be shared with trusted service providers who are authorised to act on the school's behalf and have entered into data processing agreements with us. These services may include payment processing, event ticketing, database services, website hosting and email delivery services. In these circumstances, your data will only be used for the agreed purpose relating to the service that they are providing. Occasionally promotional photos or videos of your child may be used by The Children's Theatre Group or other schools within the group. This is with prior written consent (on the ATS Registration Form).

We do not transfer any personal data to countries outside of the European Economic Area (EEA).

## Legitimate interest

We may occasionally hold or use personal data on the grounds of 'legitimate interest'. In broadest terms, this means that we can process personal information if we have a genuine and legitimate reason, and we are not harming any of your rights and interests.

Before using this basis, we carefully consider and balance any potential impact on you and your rights.

## How do we protect your personal data?

All information you provide to us is stored on our secure servers and in files which are locked away. Any personal information retained is kept confidential and stored in a secure, password protected, database that is only accessible by relevant members of staff.

We will take appropriate technical and organisational steps to ensure the security of personal data about individuals, and access to school systems. All staff are aware of the Privacy Policy and their duties under Data Protection Law and continue to receive relevant training.

## **Your Rights**

Wherever you are asked to submit personal data there will be an option for you to select the type of communications you wish to receive, and in some cases how you wish to be contacted. You have the right to update your preferences at any time by contacting us at info@aigburththeatreschool.co.uk

The accuracy of your personal data is important to us and you have the right to update the personal data that we hold. Please help us keep our records up to date by notifying us when your personal data changes by contacting info@aigburththeatreschool.co.uk

If you ask for your data to be removed, we will keep the minimum amount of information to ensure we adhere to your request. Please note however that we may have a lawful reason to hold or use the personal data in question which does not require consent.

You have the right to ask us not to hold or use your personal data however this does mean we may not be able to provide you with the full range of services that are offered

Under the Data Protection Act 1998, or after 25 May 2018, the General Data Protection Regulation, you have the right to request full details of your personal data that is held by us. To make this request please email

info@aigburththeatreschool.co.uk including a description of the information you would like to see together with proof of identity.

## **This Notice**

We will update this notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

## Questions

If you have any comments or question concerning this notice please contact

If you have reason to believe that we have not complied with this notice, or acted otherwise than in accordance with Data Protection Law, please utilise the school complaints procedure and email info@aigburththeatreschool.co.uk. 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.

#### **Data Protection Policy - Summary**

At Aigburth Theatre School we firmly believe that your personal information belongs to you and as such the privacy and security of that information is of paramount importance to us. Our aim when collecting this information is to serve you better and provide a more professional service. We will not rent or sell your information to third parties and we will always process your Personal Data in accordance with the law, in particular with the UK Data Protection Act 1998.

#### What we do with your data:

At Aigburth Theatre School, we only process data containing personal information for the purposes of: staff administration (including payroll); accounts; records; advertising, marketing and public relations in connection with Aigburth Theatre School.

#### Advertising, marketing and public relations:

We hold personal data for the purposes of advertising or marketing and promoting public relations in connection with the activities and services relating to Aigburth Theatre School.

The individuals we hold information about is restricted to any person whose personal information we need to process for our own advertising, marketing and public relations, including past, existing or present customers or suppliers. This information is restricted to information that is necessary for our advertising, marketing and public relations, for example names, addresses and other identifiers. Our disclosures (except those made with the data subject's consent) are restricted to those that we must make to third parties for purposes of our advertising, marketing and public relations.

If at any point no longer wish to receive marketing information from us, you can e-mail us at the following email address: info@aigburththeatreschool.co.uk

### **Retention of personal information:**

We will not keep personal information after the relationship between Aigburth Theatre School and the customer or supplier ends, unless and for so long as this is necessary for purposes of our advertising, marketing and public relations.

#### Updating your personal information:

Whilst taking precautions to ensure the security and confidentiality of your personal data, we endeavor to keep it as accurate as possible. If you require access to information about your account for the purpose of viewing your bookings and updating personal data, please contact us at the following email address: info@aigburththeatreschool.co.uk

#### Updates to our privacy policy:

As we continue to improve the different types of products and services we offer, Aigburth Theatre School may modify our information collection and use practices. This would only be applied to information on a going forward basis, and we will update this privacy policy to reflect that.

#### Security statement:

Aigburth Theatre School limits the number of employees that have access to the databases containing personal data, and these employees are advised of the importance of confidentiality.

### **Questions/Contact us:**

If you have any questions, comments or concerns regarding privacy practices, please contact us at the following email address: info@aigburththeatreschool.co.uk