



Privacy Policy and Terms of Service

GENERAL OVERVIEW

We collect personal information when you use VOX Dance Studios' website, make a purchase from this site, and/or when you or your child become a member of VOX Dance Studios. The information is used to enable us to process and deliver our services to provide you with the best possible service.

By registering your details on our website, you consent to VOX Dance Studios maintaining, recording, holding and using personal data we collect about you (details of how this personal data is stored and processed is detailed below). Information may also be collected to allow VOX Dance Studios to send you offers that we feel will be of particular interest to you. If you wish to receive email updates about web exclusives and special offers from VOX Dance Studios, please email **info@voxdance.co.uk**, and we will add you to our mailing list. You do have the option not to be included on our mailing list, if you would like to opt out at any point please email **info@voxdance.co.uk** and request to be removed from the mailing list.

You will be given the chance to opt in/out of any communications from us. We will not collect sensitive information about you without your explicit consent. All information that we hold will be up to date and accurate according to the latest information provided by you.

WHO WE ARE

VOX Dance Studios (the "Studio") acts as the Data Controller for the purpose of Data Protection Law. Address: VOX Dance Studios, St John's Hall, Church Road, Pool, Redruth TR15 3PT

INTRODUCTION

This Privacy Policy is intended to provide information about how the Studio will use (or "process") personal data about individuals including: its staff; its current, past and prospective students; and their parents, carers or guardians (referred to in this policy as "parents"), sponsors, and business contacts.



This information is provided because Data Protection Law (also known as General Data Protection Regulation "GDPR") gives individuals rights to understand how their data is used. Please read this Privacy Policy in order to understand the Studio's obligations and your rights.

This Privacy Policy applies alongside any other information the Studio may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Policy also applies in addition to the Studio's other relevant terms and conditions and policies, including: any contract between the Studio and its staff or the parents of students; the Studio's policy on taking, storing and using images of children (found in our terms and conditions); the Studio's safeguarding, and health and safety policies, including as to how concerns or incidents are recorded; and the Studio's Staff Code of Conduct. Anyone who works for, or acts on behalf of, the Studio (including staff, freelancers, sub-contractors, volunteers, and service providers) should also be aware of and comply with this Privacy Policy and the Studio's Data Protection Policy for staff, which also provides further information about how personal data about those individuals will be used.

RESPONSIBILITY FOR DATA PROTECTION

The Studio has appointed a Compliance Officer who will deal with all your requests and enquiries concerning the Studio'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.

Contact email address of Compliance Officer: Nichola Reynolds - Owner & Principal - nichola@voxdance.co.uk

WHY THE STUDIO NEEDS TO PROCESS DATA

In order to carry out its ordinary duties and best quality of service to staff, students and parents, the Studio needs to process a wide range of personal data about individuals (including current, past and prospective staff, students or parents) as part of its daily operation. Some of this activity the Studio will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its students. Other uses of personal data will be made in



accordance with the Studio's legitimate interests provided that these are not affecting the rights of the individual, and provided it does not involve sensitive data.

The Studio expects that the following uses will fall within that category of its "legitimate interests":

- For the purposes of new student enquiries (to confirm the identity of prospective students and their parents);
- To provide education and artistic services, including musical education, physical training, career services, and extra-curricular activities to customers (for example schools, workshops, businesses);
- Maintaining relationships with alumni and the Studio community;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax or diversity);
- To enable relevant authorities to monitor the Studio's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective students and staff in relation to providing references to potential employers;
- To enable students to take part in assessments, examinations and competitions, and to publish the general results of public examinations or other achievements of students of the Studio;
- To safeguard students' welfare and provide appropriate care;
- To make use of photographic images of students in Studio publications, on the Studio website and (where appropriate) on the Studio's social media channels in accordance with the Studio's policy on taking, storing and using images of children;
- To carry out or cooperate with any Studio or external complaints, disciplinary or investigation process; and where otherwise reasonably necessary for the Studio's purposes, including to obtain appropriate professional advice and insurance for the Studio.

In addition, the Studio will on occasion need to process special category personal data (concerning health information) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- To safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the



individual's interests to do so: for example for medical advice, for social protection, safeguarding and cooperation with police or social services, for insurance purposes or to caterers or organisers and chaperones of Studio trips who need to be made aware of dietary or medical needs;

- To provide educational services in the context of any special educational needs of a student;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- As part of any Studio or external complaints, disciplinary or investigation process that involves such data, for example if there are any SEN, health or safeguarding elements;
- For legal and regulatory purposes (for example child protection and/or health and safety) and to comply with its legal obligations and duties of care.

LEGITIMATE INTEREST

Where we believe there is 'legitimate interest', we may seek additional information before contacting companies or organisations to determine whether there is a suitable reason to engage with them, such as a shared interest or potential connection.

TYPES OF PERSONAL DATA PROCESSED BY THE STUDIO

This will include:

- Names, addresses, telephone numbers, e-mail addresses and other contact details of both the student and parent/guardian/next of kin contact information;
- Financial information, eg about parents who pay fees to the Studio (please note that any financial information processed by the Studio (for example standing order payment form) are kept securely in a locked cabinet in a locked office until passed to your bank for processing or to our third party payment processors where you have agreed (e.g. Paypal/Stripe). When transferring data we will do so in a locked, secure case;
- Past and present student attendance records (including information about any special needs), and examination scripts and marks, and progress records;
- Personnel files, including in connection with academics, employment or safeguarding; where appropriate, information about student and staff health, and contact details for their next of kin;
- References given or received by the Studio about students and staff, and information provided by previous educational establishments and/or other professionals or organisations working with students;



- Correspondence with and concerning staff, pupils and parents past and present;
- Still and moving images of students (and occasionally other individuals) engaging in Studio activities (in accordance with the Studio's policy on taking, storing and using images of children);
- Transaction and order details demographic information information relating to surveys and other feedback
- Anonymous public data and research to ensure that our communications and activity is best suited to our members such as analysis data provided by Facebook in order to advertise our services or Google Analytics, for example.

HOW THE STUDIO COLLECTS DATA

Generally, the Studio receives personal data from the individual directly (including, in the case of students, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email, social media, via the contact form on our website, by telephone or in person).

HOW WE USE DATA

We will not sell, rent, trade or distribute your personal data to any third parties for marketing purposes. Data may be shared with trusted service providers who are authorised to act on the Studio's behalf and have entered into data processing agreements with us. These services may include:

- Payment processing;
- Event ticketing;
- Secure database Services;
- Google Drive Storage;
- Website hosting;
- Email delivery services;
- Accountancy Services for purposes of records required by law
- Local council and related authorities for licensing purposes,
- Plymouth University for students enrolled on the Children's University Scheme for which we will first obtain your consent;
- The British Association of Teachers of Dancing for examination purposes.

In these circumstances your data will only be used for the agreed purpose relating to the service that they are providing. We do not transfer any personal data to countries outside of the European Economic Area (EEA) unless the service provider in question has registered its compliance with the EU-US Privacy Shield Framework.

HOW WE STORE YOUR DATA



Any information containing personal data which is provided to us by the individual or parent is stored securely in line with this policy.

Information provided by way of paper form (hard copy) will be stored in a locked cabinet within our locked combination coded office in our locked premises.

Most information containing personal data will be processed by way of an online form which is stored on our secure and password protected Dance Database Software and Cloud Storage.

Personal Data which has to be transported to another venue, for example for the purposes of providing workshops/classes, performing in an event, or storing contact information on our business phone and laptop will be transported on a password protected device or locked file.

Devices where possible will be encrypted in addition to our usual standard security measures. Any contractors/freelancers working with VOX who require access to information in order to carry out their work while maintaining care for student wellbeing will be compliant with our Processor Agreements in place with the said contractor/freelancer.

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE STUDIO SHARES IT WITH

Occasionally, the Studio will need to share personal information relating to its community with third parties, such as professional advisers (lawyers, insurers, PR advisors and accountants) government authorities (HMRC, police or the local authority); appropriate regulatory bodies (eg The British Association of Teachers of Dancing, the Information Commissioner); event organisers for licence and health and safety purposes. For the most part, personal data collected by the Studio will remain within the Studio, and will be processed by appropriate individuals only in accordance with our policy (ie on a 'need to know' basis). Particularly strict rules of access apply in the context of: medical records held and accessed only by the Studio Principal and Teachers taking the classes as appropriate, or otherwise in accordance with express consent; and safeguarding files. However, a certain amount of any SEN student's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the student requires. Staff, students and parents are reminded that the Studio is under duties imposed by law and statutory guidance to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant



authorities. For further information about this, please view the Studio's Safeguarding Policy.

Finally, in accordance with Data Protection Law, some of the Studio's processing activity is carried out on its behalf by third parties, such as 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 Studio's specific directions. The Studio will only use trusted service providers such as Google Drive for example.

HOW LONG WE KEEP PERSONAL DATA

The Studio will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the recommendation for how long to keep ordinary staff and student personnel files is up to 6 years following departure from the Studio. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. 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 the Compliance Officer by email at nichola@voxdance.co.uk. However, please bear in mind that the Studio will potentially have lawful and necessary reasons to hold on to some personal data even following such request.

KEEPING IN TOUCH AND SUPPORTING THE STUDIO

The School will use the personal data of parents, guardians and members of the Studio community so that we may keep them informed, by telephone or email, of the Studio's developments, provide opportunities to attend events, and offers or information that we feel they may be interested in. We may occasionally submit surveys to gain their feedback and views to help improve the service we currently deliver. Should you wish to limit or object to any such use, please e-mail our Compliance Officer at nichola@voxdance.co.uk. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising at any time.

YOUR RIGHTS & RIGHTS OF ACCESS

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the Studio, and in some cases ask for it to be erased or amended or for the Studio to stop processing it, but subject to certain exemptions and limitations. Any individual wishing to access or amend their personal data, or who has some other objection to how their personal data is used, should put



their request in writing to the Compliance Officer (Nichola Reynolds: nichola@voxdance.co.uk).

The Studio 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 Studio will be better able to respond quickly to smaller, targeted requests for information.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege (for example legal advice given to or sought by the Studio, or documents prepared in connection with a legal action). The Studio is also not required to share any confidential reference given by the Studio itself for the purposes of the education, training or employment of any individual

You may have heard of the "right to be forgotten" which you will be able to request from the Studio at any point. However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, legal requirement, or where it falls within a legitimate interest identified in this Privacy Policy. All such requests will be considered on their own merits.

Students can make subject access requests for their own personal data, provided that, in the reasonable opinion of the Studio they have sufficient maturity to understand the request they are making (usually considered over the age of 13 years). A student of any age may ask a parent or other representative to make a subject access request on his/her behalf. Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger students, the law still considers the information in question to be the child's.

CONSENT

Where the Studio is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please be aware however that the Studio may 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 Policy, or may otherwise exist under some form of contract or agreement with the individual (eg an employment contract, or because a purchase of goods or services).

WHO DO THE RIGHTS OF THE INDIVIDUAL BELONG TO?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the Studio will often rely on parental authority or notice for the



necessary ways it processes personal data relating to students. For example, via a form. In general, the Studio will assume that students' consent is not required for ordinary disclosure of their personal data to their parents, eg for the purposes of keeping parents informed about the student's activities, progress and behaviour, and in the interests of the student's welfare. That is unless, in the Studio's opinion, there is a good reason to do otherwise. However, where a student seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the Studio may be under an obligation to maintain confidentiality unless, in the Studio's opinion, there is a good reason to do otherwise; for example where the Studio believes disclosure will be in the best interests of the student or other students, or if required by law.

Students are required to respect the personal data and privacy of others, and to abide by the Studio's Code of Conduct (available upon request and in Welcome Packs handed to parents/guardians at the start of the student's membership with the Studio). Staff are under professional duties to do the same covered under the relevant staff policy/code of conduct.

DATA ACCURACY AND SECURITY

The Studio 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 the Compliance Officer of any significant changes to important information, such as contact details, held about them. An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the Studio may need to process your data, and who you may contact if you disagree. The Studio will take appropriate technical and organisational steps to ensure the security of personal data about individuals. All staff will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

THIS POLICY

The Studio will update this Privacy Policy from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

QUERIES AND COMPLAINTS Any comments or queries on this policy should be directed to the Compliance Officer at nichola@voxdance.co.uk

If an individual believes that the Studio has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the Studio complaints procedure and should also notify the Compliance Officer.



Parents/Guardians 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 Studio before involving the regulator.

Data Compliance Officer & Controller: Nichola Reynolds

Email: nichola@voxdance.co.uk

Tel: 07576190168