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**PRIVACY POLICY**

**SEPTEMBER 2021**

**Triple Threat Theatre Academy**

**Nine Trees Trading Estate**

**Morthen Road**

**S66 9JG**

**Rebecca Noble – 07712 357388**

**PRIVACY POLICY**

The General Data Protection Regulation (GDPR) came into effect on 25th May 2018. Rebecca Noble is the appointed Data Protection Officer (DPO) and is therefore responsible for the safe storage of information relating to our students and parents. This Notice will provide information on how we] are complying with this Regulation.

**Purpose and Statement:**

Triple Threat Theatre Academy is committed to ensuring the data processed by us remains safe and secure.

This policy has been written in line with legislative change, including both the Data Protection Act (1998) and the EU’s General Data Protection Regulation (GDPR).

Triple Threat Theatre Academy has determined the lawful reasons with which it processes personal data:

Legal obligation

Legitimate interest

Contract

There is also some limited data we process with consent from the Data Subject; Consent – GDPR Article 6(1)(a).

While Triple Threat Theatre Academy avoids sharing data with third parties at most times, some data is shared in accordance with our business practices. The sharing of data with third parties will always be consensual with the data subject and/or their parent/guardian, and only if Triple Threat Theatre Academy is satisfied that their Data Protection policy is GDPR compliant.

**Main Aims for the policy:**

* Specify the data Triple Threat Theatre Academy collect, how it is stored/protected and the reason for collecting it
* State how Triple Threat Theatre Academy use personal data in processing
* Disclose who has access to the data and how long we retain information for
* Explain Data Subject’s rights with Triple Threat Theatre Academy’s data including access, rectification and erasure

The GDPR includes 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
* the right not to be subject to automated decision-making including profilin

**General Principles**

**Triple Threat Theatre Academy**  is committed to providing fair and understandable privacy policies in relation to personal data.

Triple Threat Theatre Academy will, at all times, keep data in secure locations (including, but not limited to, encrypted and access restricted files) and not retain data unnecessarily or past the retention length as set out in this policy.

In the rare instance a data processor that is not a Triple Threat Theatre Academy employee is used, such as a third party, the data subject will either be asked for consent pre to supplying the data or be notified and have the right to object to processing.

Triple Threat Theatre Academy 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 student themselves if they are 18yrs or over.   
Personal data may also come to us unsolicited via enquiries through our website/social media sites and to our generic email account.

To attend any of Triple Threat Theatre Academy’s ’s activities participants/parents/guardians must agree to some processing of their personal data. This is due to Legitimate Interests, Legal Obligation Contract and/or Consent.

Should Triple Threat Theatre Academy 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 Triple Threat Theatre Academy collects includes but is not limited to: Medical/Disability information and Gender

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.

Personal data and some special category is collected.

It is essential to our primary function (providing classes to participants) that we are provided, and allowed to process and store the following:

**Participant Personal Data:**

Full Name

Date of Birth

Home Address

Sex

Permission to go home alone

Classes attended/Price paid Article

Participant Special Category Data:

Medical Information/History

Disability Information

Gender/Sex

Parent/Guardian Personal Data:

Name

Address

Email Address

Mobile Telephone Number

Work/Home Number

Emergency Contact Number

Triple Threat Theatre Academy transports data with all due diligence. Enrolment forms are sent to Triple Threat Theatre Academy through an encrypted email server directly from our website which has controlled access. Received enrolment forms are stored on an encrypted email server for no more than 6 months. Received paper enrolment forms are destroyed after no more than 4 weeks.

Data received through enrolment forms is uploaded manually into our database software.

Registers and emergency contact lists created from student data are stored on our database software .

Hard copies of registers and emergency contacts are carried by authorised staff members. They are locked away while not in use. When they are no longer in use or out-dated, they are destroyed thoroughly.

Waiting lists are stored on our database software.

Our standard retention policy (without the data subject’s right to access, rectification and erasure etc.) is THREE YEARS post final attendance.

Exceptions to our retention policy:

* First Aid records are kept for 21 years due to legal obligation
* Photo consent may be kept indefinitely
* Child Safeguarding records are kept indefinitely on a case-by-case basis, the minimum these will stored for is 6 years due to legal obligation
* Enquiries that do not turn into bookings with current classes are deleted after they have been dealt with
* Triple Threat Theatre Academy does not actively share data with third parties, however there are certain instances where sharing information is crucial to our business processes.

**Teachers:**

Teachers at Triple Threat Theatre Academy will never be provided with personal details aside from participant’s names and any medical information that is pertinent to the running of a class (subject to consent from the data subject)

**Child Performance Licensing:**  
In order to process child performance licences, Triple Threat Theatre Academy] are legally required to provide some personal data to local councils (including but not limited to: full name, date of birth and school details). This is an optional consent, which will be sought at the time of sending participation consent forms. Triple Threat Theatre Academy is satisfied that their GDPR process are thorough and any data will be stored in a secure environment, and not unnecessarily retained.

**Child Safeguarding Concerns:**  
In the unlikely event Triple Threat Theatre Academy has a safeguarding concern in relation to one of our participants, Triple Threat Theatre Academy are legally required to provide data to the safeguarding board at the local council. Triple Threat Theatre Academy is satisfied that their GDPR process are thorough and any data will be stored in a secure environment, and not unnecessarily retained.

**Event Programmes:**  
Triple Threat Theatre Academy may occasionally produce programmes for events. These will only ever contain the full name of the child and the name of a child’s class may also be included. Participants/their Parent and/or Guardians may opt out if they don’t want to be included in the programme when they agree to participate at an event.

**Any data subject with personal data stored within Triple Threat Theatre Academy is entitled to the rights of:**

**Access**  
You may contact Triple Threat Theatre Academy at any time to access all data held relating to you and/or your child(ren). Triple Threat Theatre Academy will ensure that we respond to a subject access request without undue delay and within one month of receipt. If the information request will also include data regarding others, Triple Threat Theatre Academy has the right to refuse the request or take steps in order to obtain consent from other involved parties. The right of access does not apply to Triple Threat Theatre Academy ’s legal obligations such as Child Safeguarding records.

**Rectification**  
You may contact Triple Threat Theatre Academy at any time in order to rectify data held relating to you and/or your child(ren). Triple Threat Theatre Academy will ensure that we respond to a rectification request without undue delay and within one month of receipt..

**Erasure**  
You may contact Triple Threat Theatre Academy at any time in order to erase data held relating to you and/or your child(ren). Triple Threat Theatre Academy will ensure that we respond to an erasure request without undue delay and within one month of receipt.  
The right to erasure does not apply to Triple Threat Theatre Academy ’s legal obligations such as First Aid records.

**Restrict Processing**  
You may contact Triple Threat Theatre Academy at any time in order to restrict the data we process relating to you and/or your child(ren). Triple Threat Theatre Academy will ensure that we respond to a request to restrict processing without undue delay and within one month of receipt. However, due to our legitimate interest in most of the data collected- we may have to revoke your membership with Triple Threat Theatre Academy until the restriction is lifted. This is due to Health and Safety and Child Safeguarding.

**Data Portability**  
You may contact Triple Threat Theatre Academy at any time in order to obtain the data we process relating to you and/or your child(ren) and reuse it across different services. Triple Threat Theatre Academy will ensure that we respond to a request to restrict processing without undue delay and within one month of receipt. Please note, this does not apply to Triple Threat Theatre Academy’s legal obligations.

**Objection**  
You may contact Triple Threat Theatre Academy at any time in order to object to the processing of data relating to you and/or your child(ren). Triple Threat Theatre Academy will ensure that we respond to a request to restrict processing without undue delay and within one month of receipt.  
However, due to our legitimate interest in most of the data collected- we may have to revoke your membership with Triple Threat Theatre Academy until the restriction is lifted. This is due to Health and Safety and Child Safeguarding.

**Rights related to automated decision making including profiling**  
You may contact Triple Threat Theatre Academy at any time in order to object to profiling relating to you and/or your child(ren). Triple Threat heater Academy will ensure that we respond to a request to restrict processing without undue delay and within one month of receipt. However, due to our legitimate interest in most of the data collected- we may have to revoke your membership with Triple Threat Theatre Academy until the profiling restriction is lifted. This is due to Health and Safety and Child Safeguarding. Triple Threat Theatre Academy has a lawful reason for profiling; Legitimate Interests and consent. None of Triple Threat Theatre Academy’s decision making is automated. Profiling is only used in circumstances where a participant may have certain health/disability needs which may prevent them from taking part in classes (as it would be unsafe to do so).

Any and all verbal requests are noted, and then contacted again either via phone or email to verify the request. Verbal requests will be responded to in the time frames mentioned above.

Triple Threat Theatre Academy 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.

**Social Media:**

Triple Threat Theatre Academy regularly share photos/videos of students in workshops, events and performances through social media platforms including; Instagram, Facebook, Twitter, 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.

The registered Data Protection Officer (DPO) is busines owner Rebecca Noble

**Complaints:**

Complaints in regard to the handling of any personal data can be made directly to Triple Threat Theatre Academy’s DPO:

Rebecca Noble

CEO

Triple Threat Theatre Academy

Nine Trees Trading Estate

Morthen Road

Wickersley

S66 9JG

Reb\_hill23@yahoo.co.uk

07712 357 388

**Data Breeches:**

If Triple Threat Theatre Academy experiences a data breech of any kind, we have a legal obligation to report this to ICO within 72 hours. The data breech will be reported by the DPO. In the instance they are unavailable to report the breech, the next most senior staff member shall do so. Triple Threat Theatre Academy will also inform all the victims of the data breech as soon as possible if there is a high risk of adversely affecting individuals’ rights and freedoms. Triple Threat Theatre Academy will store and record all data breeches.