

Sinclair School of Highland Dancing Privacy Information Notice

This privacy notice provides you with details of how we collect and process your personal data. It applies to any information you may provide to us when you register as a new pupil, sign up for any event, purchase a product, sign up to our newsletter and any other services referred to in this Privacy Information Notice.

Sinclair School of Highland Dancing Limited (“SSHD”) (referred to as “we”, “us” or “our” in this privacy notice) is the data controller and we are responsible for your personal data.

‘Personal Data’ refers to your own personal data and/or the personal data of your child who is either currently or previously enrolled as a pupil with SSHD.

‘You’ refers to yourself and, if under the age of 16, your child who is either currently or previously enrolled as a pupil with SSHD.

1. WHO WE ARE

Our full details are:

Sinclair School of Highland Dancing Limited

Email address: sinclairhighlanddancing@gmail.com

Postal address:
19 Kepplestone Avenue
Aberdeen
AB15 7XF

Telephone number: 07972 104 774

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at sinclairhighlanddancing@gmail.com

2. WHY WE NEED TO COLLECT, USE AND PROCESS PERSONAL INFORMATION

We collect personal information from you when you apply for yourself or your child to join SSHD and in order to deliver our service to the correct standard. When you complete an enrolment form to become a pupil within SSHD, you understand that we will be processing your personal data for the purposes set out above.

3. WHAT DATA DO WE COLLECT ABOUT YOU

Personal data means any information capable of identifying an individual. It does not include anonymised data.

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We may process certain types of personal data about you as follows:

- **Identity Data** may include your first name, last name, username, date of birth and title.
- **Contact Data** may include your address, email address and telephone numbers.
- **Other Data** may include next of kin, PVG status, any applicable medical conditions should you wish to disclose that would impact your wellbeing during class.
- **Transaction Data** may include details about your previous exams and your payment history.
- **Usage Data** may include information about how you use our website, products and services.

Marketing and Communications Data may include your preferences in receiving marketing communications from us and your communication preferences.

Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health (excluding as above) and genetic and biometric data. We do not collect any information about criminal convictions and offences.

Where we are required to collect personal data by law, or under the terms of our agreement to provide our products and services (“the contract”) between us, and if you do not provide us with that data when requested, we may not be able to perform the contract (for example, an emergency contact telephone number). If you don’t provide us with the requested data, we may have to cancel your class place, a product or service you have enrolled for but if we do, we will notify you at the time.

4. HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you through a variety of different methods including:

- **Direct interactions:** You may provide data by filling in forms (such as your registration or renewal) or by communicating with us by post, phone, email or otherwise, including when you:
 - take part in events;
 - subscribe to received any information;
 - give us feedback.
- **Automated technologies or interactions:** Our website is for information delivery only. We do not collect, store or process any direct personal data through our website or related platforms. Our website is hosted by 1&1 Internet Limited, they may automatically collect Technical Data about your equipment, browsing actions and usage patterns when visiting the site. Details of their privacy notice can be found at <https://www.1and1.co.uk/terms-gtc/terms-privacy/>
- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
 - Website analytics providers such as Google based outside the EU;
 - Publicly available social media platforms such as Facebook, LinkedIn, Google+, Instagram, Twitter, based outside the EU.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as our online banking platform. This data is not shared with anyone and is only used for conducting business with our existing clients, for example for the purposes of invoicing and receiving and/or sending payment.

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5. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we rely upon:-

- Consent;
- Performance of a contract with you; or
- It being necessary to comply with a legal obligation as a legal ground for processing your personal data.

You have the right to withdraw consent at any time by emailing us at sinclairhighlanddancing@gmail.com.

Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email sinclairhighlanddancing@gmail.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a pupil of SSHD	(a) Identity (b) Contact (c) Other (d) Transaction	Performance of a contract with you
To process and deliver you our services	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	Performance of a contract with you
To manage our relationship with you	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services

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To administer and protect our business	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy

Marketing communications

From time to time, where you have provided consent, we may use your information to contact you by telephone, post, email or by any other electronic means, with details about our products and services, which we feel may be of interest to you.

We will get your express opt-in consent before we commence any email communication activity for the purposes as detailed above. By providing the SSHD with an email address on your initial enrolment form, you will be consenting to us contacting you via this platform.

You can ask us to stop sending you email communication messages and/or remove you e-mail address on file at any time by following the by emailing us at sinclairhighlanddancing@gmail.com.

Where you opt out of receiving our email communications, this will not apply to personal data provided to us as a result of your continued enrolment with SSHD.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us at sinclairhighlanddancing@gmail.com. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

6. DISCLOSURES OF YOUR PERSONAL DATA

We only share your personal data with BATD as set out below for the purposes of examinations:

British Association of Teachers of Dance:

The third party that information is shared with is the BATD for exam purposes; this is provided on a non-electronic basis and consists of Child Name, Date of Birth and Gender. BATD have confirmed that they have their own policy and will respect the security of your personal data and to treat it in accordance with the law.

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7. DATA RETENTION

Information will only be held for as long as is necessary to meet and legal, regulatory or fraud prevention requirements and for our lawful business processing. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We regularly review our records to ensure that we only retain your personal information for as long as necessary for the purposes set out in the privacy notice.

8. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to only those who have a business need to know such data. Such individuals are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

How do we store information?

We store information in both paper and digital formats. The paper copy protects the information held by SSHD from the potential risk of a technological failure with our computer. The digital copy protects the information held by SSHD from physical damage e.g. Fire or water damage.

The controls in place for ensuring security of personal data:

- Individual electronic files where the information is held are password protected.
- The Macbook Pro on which the data is held has its Firewall switched on
- The user profile in which the files are saved is also password protected.
- The primary broadband connection will be route through the Apple Airport device which is linked to the BT Broadband at SSHDs registered office (19 Kepplestone Avenue, Aberdeen, AB15 7XF)
- All external security is out with the control of SSHD.
- Information provided on paper forms such as registration information is kept in a locked filing cabinet at 19 Kepplestone Avenue, Aberdeen, AB15 7XF.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at sinclairhighlanddancing@gmail.com

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or

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excessive. Alternatively, we may refuse to comply with your request in these circumstances. You also have the right to lodge a complaint with the Information Commissioners Office (ICO) for data protection matters.

10. OTHER SITES AND SOCIAL MEDIA

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

11. CHANGES TO OUR PRIVACY NOTICE

We may change, modify or adjust this Privacy Information Notice, however we will not reduce your rights. Any changes made in the future will be available on our website.

12. CONTACT US

We take your privacy and protection of your personal information very seriously. If you have any concerns, questions or comments about the way we are collecting or using your personal data, please contact us at sinclairhighlanddancing@mail.com