



# HASLAND DANCE STUDIOS

## General Data Protection Regulation (GDPR) POLICY

### effective from 25<sup>th</sup> May 2018

#### What is GDPR?

The General Data Protection Regulation (GDPR) is a comprehensive data protection regulation that unifies data protection law across all European Union member states. It defines an extended set of rights for European Union citizens and residents regarding their personal data. Consequently, it describes strict requirements for companies and organisations on collecting, storing, processing and managing personal data. This Regulation comes into effect from 25<sup>th</sup> May 2018.

### What is your 'personal data'?

Under GDPR, the personal data referred to is PII (Personally Identifiable Information). This is data which can, directly or indirectly, identify an individual. Examples would be: full names, email addresses, postal addresses, account details, phone numbers.

The new Regulation requires that personal data is processed lawfully, fairly and in a transparent manner. It must only be used for the specified purposes and not further processed. The data collected must be relevant and limited to what is necessary.

### How does GDPR affect HDS staff and customers?

From May 25<sup>th</sup> 2018, it becomes the legal responsibility for Hasland Dance Studios to protect our staff and customers' personal data and to give them the right to decide what personal data we hold, how it is stored and how it is used.

### Who at Hasland Dance Studios takes responsibility for data protection?

From May 25<sup>th</sup> 2018 until further notice, Hasland Dance Studios designates a Partner, Anne-Marie Maple, to be responsible for its GDPR compliance. This responsibility includes: the updating or deleting of personal data provided by HDS staff and customers in line with their requirements from all places of storage and communication with staff/customers to ensure GDPR compliance; being accountable for and being able to demonstrate this compliance.

### The rights of the HDS staff member/customer under GDPR

- **The right to be informed** – HDS will undertake to inform its staff/customers of the data being collected and how it will be used.
- **The right of access** – an HDS staff member/customer has the right to see the data collected on them/their children.
- **The right to rectification** – where the staff member's/customer's data held by HDS is inaccurate, the staff member/customer has the right to have this corrected.
- **The right to erasure** – the staff member/customer has the right to request HDS delete or amend any data provided. Please note, however, under the HDS Terms & Conditions, where fees remain unpaid, relevant data will be held until such time as settlement of the outstanding account is made.
- **The right to restrict processing** – a staff member/customer has the right to restrict use of their personal data, for example, should a customer not wish their child's name to be included in a document, the data held need not be erased but will not appear in that document.
- **The right to data portability** – a staff member/customer may request data held by HDS, for example, previous exam results, to be provided should that

staff member/customer move to a new dance school or require the information for another purpose.

- **The right to object** – where we hold contact details, an HDS staff member/customer may object to receiving marketing material, such as advertising forthcoming workshops.

### Consent

HDS is no longer able to assume consent for any use of data without this being positively given by staff, students aged 16 and over and by a Parent/Guardian for all other students. Such individuals are entitled to withdraw consent at any time.

Only where HDS is contractually or legally obliged to process data, for example, giving full name and date of birth to festival or street comp organisers where an HDS contract to participate has been signed by a student and parent/guardian, or where data is required by HMRC on a staff member, in such cases there is no need for further consent to be given.

### Data Security

Data collected by HDS will be stored and processed in a manner that ensures appropriate security. HDS will ensure the GDPR compliance and suitability of external services (such as exam boards) we use to process data.

Any documents which include personal data kept at HDS, for example, staff contracts, registration forms and class registers, will be stored in a locked cabinet when not in use. When no longer required, documents with personal data will be shredded, or, in the case of legal requirement, archived securely.

All HDS staff who hold personal data outside of the Studios will ensure their devices are password-protected and personal data encrypted. Paperwork will be stored in a locked cabinet. Data no longer required will be deleted and documents shredded.

For IT compliance, HDS will ensure its devices have encryption and suitable protection software. The software we use to administrate the School – Dancebiz- is GDPR compliant. All our email correspondence is sent and received through a Google mail account. As a service provider, Google guarantees data protection to its customers and offers increased security settings which HDS will use when sharing personal data via email.