

Emil Dale School of Performing Arts Ltd & Emil Dale Academy Privacy Policy

Document History

Version Number	Date of Issue	Review Date	Author	Changes Made/ detail
01	24.05.18	24.05.19	Sarah Moore	First draft

1. Aim

Emil Dale School of Performing Arts Ltd is the 'data controller' as we collect and use information about students/ members/ parents/ people with interest in the company to carry out the services our company provides to the aforementioned groups of people.

Emil Dale School of Performing Arts Ltd (EDSA Ltd) is the operating company for Emil Dale School of Performing Arts Cambridge Ltd, Emil Dale West End Excess, Emil Dale Academy and Emil Dale Studios. This policy will refer to these companies under one title "EDSA Ltd".

EDSA Ltd is committed to protecting your data and being transparent about how we use your data, in line with the current Data Protection Act (1998), the General Data Protection Regulations (GDPR) and any resulting legislation. EDSA Ltd (we, us, our), collect and use your personal data (your personal information) in connection with our business.

This document explains what rights you have to access or change your personal data.

This Privacy Notice applies to our interactions with you in relation to our business and services whether via our website (www.emildale.co.uk), by telephone, by SMS, by email, in person at one of our teaching or theatre venues, or at a venue operated by a third party. It also applies to our interactions with you when working off site such as during our productions, outreach workshops and auditions.

This policy does not form part of any employee's contract of employment and it may be amended at any time. Any breach of this policy by members of staff will be taken seriously and may result in disciplinary action and serious breaches may result in dismissal. Breach of the GDPR may expose the EDSA Ltd to enforcement action by the Information Commissioner's Office (ICO), including the risk of fines. Furthermore, certain breaches of the Act can give rise to personal criminal liability for the Trust's employees. At the very least, a breach of the GDPR could damage our reputation and have serious consequences for the Trust and for our stakeholders.

Maintaining data security means guaranteeing the confidentiality, integrity and availability of the Personal Data, defined as follows:

Confidentiality means that only people who are authorised to use the data can access it.

Integrity means that Personal Data should be accurate and suitable for the purpose for which it is processed.

Availability means that authorised users should be able to access the data if they need it for authorised purposes.

This document contains sections relating to the collection of data for Full-time students and their parents/ guardians, part-time students/ members and their parents guardians and staff/ subcontractors.

2. WHEN DOES EDSA LTD COLLECT INFORMATION?

2.1 We collect information about students/ prospective students and staff/ prospective staff when you:

1. Make an enquiry, provide feedback or make a complaint over the phone, by email or on our website
2. Submit correspondence to us by post, email or via our website
3. Apply for one of our courses and/or register as a student
4. Attend a class, workshop, masterclass, audition, production, event or other learning activity
5. Attend an interview or audition as a prospective student for one of our courses
6. Register and make a donation to become a supporter (whether as a “friend”, “member” or “patron” or general donor of our organisation)
7. Update your personal information or account details
8. Subscribe to our newsletter and mailing lists
9. Fill in a form, conduct a search, post content on the website, respond to surveys, participate in promotions or use any other features of the website
10. register for and/or attend our events or performances at one of our venues
11. Provide or offer to provide us with goods or services
12. Submit a CV or an application for a job vacancy
13. Attend an interview or assessment for a job vacancy; and
14. “Follow”, ‘like’, post to or interact with our social media accounts, including Facebook, Youtube, Twitter, Snapchat, Instagram.

3. WHAT INFORMATION DO YOU PROVIDE TO EDSA LTD?

*NB** more detail about this is below specifically relating to full-time or part-time courses and prospective staff*

1. Identity and contact data: title, names, addresses, date of birth, email addresses and phone numbers
2. Information on previous academic qualifications and a statement concerning relevant experience, a 'headshot' photograph and other data items needed for monitoring purposes
3. Student fees and funding: if you are a student or prospective student applying for a course or an examination you may also provide payment details, which may include billing addresses, credit/debit card details and bank account details and details of other financial information related to your funding such as eligibility for undergraduate grants, student loans, scholarships and bursaries
4. Academic background data: if you are a student or prospective student applying for or registering for a course or an examination, you may also provide details of your academic records and results and unique learner number
5. Graduate records of auditions: if you are a graduate and you attend an audition, you may also provide us with details about your audition so that we may handle casting enquiries efficiently in the future
6. Employment and background data: if you are submitting a job application, you may also provide additional information about your academic and work history, projects and research that you are involved in, your previous income level, references and any other such similar information that you may provide to us; and
7. Survey data: from time to time we might ask if you would be willing to participate in our surveys; if you agree, we will also collect any information that you provide as part of that survey.

4. WHAT INFORMATION DOES EDSA LTD COLLECT DIRECTLY?

1. Information contained in correspondence: we will collect any information contained in any correspondence between us. For example, if you contact us using a query button on our website or by email or telephone, we may keep a record of that correspondence
2. Information transmitted on the website: we will collect information that you upload or post to your website account
3. Information collected in person: we will collect any information you supply to us in person during the course of our services
4. Information collected during our outreach workshops: if you attend one of our outreach workshops, we will keep a record of your attendance and your contact details in the event that you qualify for one of our full-time courses
5. Transactional data: we will collect information related to your transactions, including the date and time, the amounts charged and other related transaction details
6. Website usage and technical data: we will collect certain information about how you use our website and the device that you use to access our website, even where you have not created an account or logged in. This will include your geographical location, device information (such as your hardware model, mobile network information, unique device identifiers), the data transmitted by your browser (such as your IP address, date and type of the request, content of the request regarding the specific site, time zone settings, access status/HTTP status code, volume of data transmitted, browser type and version, language settings, time zone settings referral source, length of visit to the website, date and time of the request, operating system and interface) number of page views, the search queries you make on the website and similar information. This information may be collected by a third party website analytics service provider on our behalf and/or may be collected using cookies or similar technologies.
7. Imagery: from time to time we may capture images of you when we take photographs or film the Spaces. We will endeavour to let you know by printed notices at our venues whenever such filming or photography will take place; and
8. CCTV: we collect information about you through CCTV footage which operates at our venues. We endeavour to give you notice of our use of CCTV by fixing signs at the entrances to our venues which inform you of our use of CCTV.

5. SPECIAL CATEGORIES OF PERSONAL DATA

We may need to collect special categories of personal data from you. Special categories of data include details about your race or ethnicity, religious or philosophical beliefs, gender, date of birth, income, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. Depending on the circumstances we will also collect information about criminal convictions and offences as described in more detail below.

We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. The main circumstances in which we may lawfully process special categories of personal information are:

1. In limited circumstances, with your explicit written consent
2. Where we need to carry out our legal obligations or exercise rights in connection with employment
3. Necessary to protect your vital interests and you are physically or legally incapable of giving consent
4. Necessary for the establishment, exercise or defence of legal claims
5. Where it is necessary for reasons of substantial public interest or on the basis of applicable laws, such as to ensure compliance with legislation relating to our status as a Higher Education provider, or legislation concerning the safeguarding of children and of individuals at risk, or legislation requiring us to make reasonable adjustments for protected characteristics, or equal opportunity monitoring or treatment; or where you have already made the information public.
6. Depending on the circumstances we collect the following special categories of data:

If you are a job applicant, we may collect information about

- your race, ethnicity, religious or philosophical beliefs and sexual orientation for the purpose of our diversity and equal opportunities records (on the basis that it is needed for reasons of substantial public interest, for equal opportunities monitoring)
- your health and any disability you may have as necessary for the purpose of arranging your interview (on the basis of compliance with our legal obligations to make reasonable adjustments in relation to protected characteristics)
- your criminal record for the purposes of completing background checks necessary for you to be able to work with children to whom we provide some of our courses (on the basis such processing is necessary for reasons of substantial public interest under applicable laws)
- If you are offered a place on one of our taught courses, you will be asked to declare details of any relevant unspent criminal convictions, in order for us to assess any risk to which staff and other students may be exposed (on the basis such processing is necessary for reasons of substantial public interest under applicable laws)

If you are a student, staff or an attendee at a workshop, we will collect information

- related to your health such as allergies to particular forms of medication, or conditions such as asthma or diabetes and dietary requirements (on the basis of your explicit consent). There will be very limited reasons why we might use such information without your explicit consent, for example in a medical emergency to inform medical professionals

If you are a supporter at any level we may collect data to

- improve your experience and note your preferences which could include dietary and health information which you provide to us orally or by email or post (on the basis of your explicit consent). There will be very limited reasons why we might use such information without your explicit consent, for example in a medical emergency to inform medical professionals

If you are a student or prospective student, we will collect information about

- your medical history or requirements if a reasonable adjustment is needed in order to ensure we are able to offer you a fair and equitable assessment (either on the basis of your explicit consent or in compliance with our legal obligation to make reasonable adjustments for your circumstances).

6. INFORMATION WE RECEIVE FROM THIRD PARTIES

In certain circumstances, we will receive information about you from third parties. For example:

1. Employers and referees: if you are a job applicant we may contact your recruiters, current and former employers and/or referees, who may be based inside or outside the EU, to provide information about you and your application
2. Academic references: if you are a prospective student we may contact your academic referees to provide information about your application, and we may receive information about you from third parties such as UCAS, Pearson or your previous school/ college/ educational establishment
3. Service providers: we may collect personal information from our website developer, IT support provider and payment services providers (who are based inside the EU)
4. Social media plugins: we currently use social media plugins from the following service providers who are based both inside and outside the EU: Facebook, YouTube, Twitter, Snapchat, and Instagram. By providing your social media account details you are authorising that third-party provider to share with us certain information about you
5. Attendance data: we collect information about your attendance via software and through and by other electronic means such as swipecard records which provides information about your access to our courses including the frequency and location
6. Medical information: if you are a student or prospective student we may receive an assessment from your medical practitioner, educational psychologist, psychiatrist, counsellor or other medical professional in order to assess your fitness to train in respect of our full-time course provision
7. We might also receive information about you from third parties if you have indicated to such third party that you would like to hear from us.

7. HOW WE USE INFORMATION ABOUT YOU AND RECIPIENTS OF YOUR INFORMATION

We will use your information for the purposes listed below either on the basis of:

1. performance of your contract with us and the provision of our services to you
2. your consent (where we request it)
3. where we need to comply with a legal or regulatory obligation
4. our legitimate interests

We may use your information for the following purposes:

1. To monitor your attendance if you are a student: if you are a student we also monitor your attendance through the data supplied by our timetabling software provider and/or your access card to ensure your attendance is in line with the course requirements (on the basis of our legal obligation under UKVI's requirements for international student visas, or on the basis of our legitimate interests in safeguarding your wellbeing and monitoring your progression as a student on one of our courses)
2. To process and facilitate transactions with us: we will use your information to process transactions and payments, and to collect and recover money owed to us (on the basis of performing our contract with you and on the basis of our legitimate interest to recover debts due)
3. To track the effectiveness of our outreach activity: we will use your information collected if you attended a workshop, masterclass, event or audition (on the basis of our legitimate interest to track the effectiveness of our activities)
4. To manage casting enquiries: we use records of your past auditions to manage subsequent casting enquiries we receive about you (on the basis of our legitimate interest to track the casting of our graduates and handle enquiries about our graduates efficiently)
5. Relationship management: to manage our relationship with you, which will include notifying you about changes to our terms of use or Privacy Notice, and asking you to leave a review or take a survey (on the basis of performing our contract with you, to comply with our legal obligations and on the basis of our legitimate interests to keep our records updated and study how our website and services are used);
6. User and customer support: to provide customer service and support (on the basis of our contract with you), deal with enquiries or complaints about the website and share your information with our website developer, IT support provider, payment services provider as necessary to provide customer support (on the basis of our legitimate interest in providing the correct products and services to our customers and to comply with our legal obligations)
7. Fundraising: to identify individuals and organisations whose beliefs and values are aligned with the core work of our organisation for philanthropic support and for memberships (on the basis of our legitimate interests as a registered charity to seek support and promote fundraising)
8. Prize draws, competitions and surveys: to enable you to take part in prize draws, competitions and surveys (on the basis of performing our contract with you and our legitimate interest in studying how our website and services are used, to develop them and grow our business)
9. Recruitment: to process any job applications you submit to us including sharing this with our third party recruitment agency (on the basis of our legitimate interest to recruit new employees or contractors)
10. Marketing: to keep in contact with you about our news, events, new website features products or services and fundraising opportunities that we believe may interest you, provided that we have the requisite permission to do so (either on the basis of your consent where we have requested it, or our legitimate interests to provide you with marketing communications where we may lawfully do so). We will note your marketing preferences so that we only contact you with information you have told us you would like to hear about and you may update these preferences at any time
11. Advertising: to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you (on the basis of our legitimate interests in studying

how our website/services are used, to develop them, to grow our business and to inform our marketing strategy)

12. Publicity: to promote our services which may include photographs or films in which you may appear. We may use such photographs or films in our printed and online publicity, social media and press releases (on the basis of our legitimate interests in promoting our services)
13. Analytics: to use data analytics to improve our website, products/services, marketing, customer relationships and experiences (on the basis of our legitimate interests in defining types of customers for our website and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
14. Suggestions and recommendations: to share your information with selected third parties such as suppliers and partners, to enable them to contact you with information about things that may interest you (where we have your consent to do so)
15. Research: to carry out aggregated and anonymised research about general engagement with our website (on the basis of our legitimate interest in providing the right kinds of products and services to our website users)
16. Compliance with policies, procedures and laws: to enable us to comply with our policies and procedures and enforce our legal rights, or to protect the rights, property or safety of our employees and share your information with our technical and legal advisors (on the basis of our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so).

Where we refer to using your information on the basis of our “legitimate interests”, we mean our legitimate business interests in conducting and managing our business and our relationship with you, including the legitimate interest we have in:

1. Personalising, enhancing, modifying or otherwise improving the services and/or communications that we provide to you
2. Promoting our services and studying how our website/services are used, to develop them, to grow our business and to inform our marketing strategy
3. Safeguarding your wellbeing and monitoring your progression as a student on one of our courses detecting and preventing fraud and operating a safe and lawful business
4. Maintaining our reputation and standing as a Higher Education Provider
5. Improving security and optimisation of our network, sites and services.

Where we use your information for our legitimate interests, we make sure that we take into account any potential impact that such use may have on you. Our legitimate interests don't automatically override yours and we won't use your information if we believe your interests should override ours unless we have other grounds to do so (such as your consent or a legal obligation). If you have any concerns about our processing please refer to details of “Your Rights” below.

8. WHO WE WOULD SHARE YOUR INFORMATION WITH

In connection with the purposes and on the lawful grounds described above and in addition to the recipients of your information as described above, we will share your personal information when relevant with third parties such as:

1. Partners and collaborators: including the University of Bedfordshire (our validating University) and the Knights Templar School, Baldock (our partner for BTEC course delivery). Both based in the UK
2. Our service providers: service providers we work with to deliver our business, who are acting as processors and provide us with:
 - Website development and hosting services
 - Marketing and advertising services
 - Social media plugin services including Facebook, Twitter, Instagram, Snapchat and YouTube based in the UK and USA
 - Payment service providers such as classbiz and worldpay
 - legal, accountancy, auditing and insurance services and other professional advisers based in the UK
3. Regulators and governmental bodies: HM Revenue & Customs, regulators, governmental bodies and other authorities including, but not limited to the Office for Students (OfS) and the Higher Education Statistics Agency, (HESA), OFQUAL, Qualification Wales, CCEA, UCAS, Learning Records Service, Pearson, and UKVI, acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances
4. Prospective sellers and buyers of our business: any prospective seller or buyer of such business or assets, only in the event that we decide to sell or buy any business or assets; and
Other third parties (including professional advisers): any other third parties (including legal or other advisors, regulatory authorities, courts, law enforcement agencies and government agencies) based in the United Kingdom where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

9. HOW WE LOOK AFTER YOUR INFORMATION AND HOW LONG WE KEEP IT FOR

We operate a policy of “privacy by design” by looking for opportunities to minimise the amount of personal information we hold about you. We use appropriate technological and operational security measures to protect your information against any unauthorised access or unlawful use, such as:

1. ensuring the physical security of our Spaces
2. ensuring the physical and digital security of our equipment and devices by using appropriate password protection and encryption
3. maintaining a data protection policy for, and delivering data protection training to, our employees
4. limiting access to your personal information to those in our company who need to use it in the course of their work.

We will retain your information for as long as is necessary to provide you with the services that you have requested from us or for as long as we reasonably require to retain the information for our lawful business purposes, such as for the purposes of exercising our legal rights or where we are permitted to do. We operate a data retention policy and look to find ways to reduce the amount of information we hold about you and the length of time that we need to keep it. For example, we maintain a suppression list of email addresses of individuals who no longer wish to be contacted by us. So that we can comply with their wishes we must store this information permanently.

10. HELP KEEP YOUR INFORMATION SAFE

You can also play a part in keeping your information safe by:

1. Being vigilant to any fraudulent emails that may appear to be from us. Any emails that we send will come from an email address ending in '@emildale.co.uk'
2. storing all private, sensitive and confidential documents in a secure environment such as a lockable cabinet or non-portable safe.
3. Keeping us up to date with your current relevant information

11. YOUR RIGHTS TO THE INFORMATION WE HOLD ABOUT YOU

You have certain rights in respect of the information that we hold about you, including:

1. the right to be informed of the ways in which we use your information, as we seek to do in this Privacy Notice
2. The right to ask us not to process your personal data for marketing purposes
3. The right to request access to the information that we hold about you
4. The right to request that we correct or rectify any information that we hold about you which is out of date or incorrect
5. In certain circumstances, the right to ask us to stop processing information about you
6. The right to lodge a complaint about us to the UK Information Commissioner's Office (<https://ico.org.uk/>), you will also be able to lodge a complaint with the relevant authority in your country of work or residence
7. The right to withdraw your consent for our use of your information in reliance of your consent, which you can do by contacting us using any of the details at the top of this Privacy Notice
8. The right to object to our using your information on the basis of our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground
9. The right to receive a copy of any information we hold about you (or request that we transfer this to another service provider) in a structured, commonly used, machine readable format, in certain circumstances
10. The right to ask us to limit or cease processing or erase information we hold about you in certain circumstances.

12. HOW TO EXERCISE YOUR RIGHTS

You may exercise your rights above by contacting us using the details at the top of this Privacy Notice, or in the case of preventing processing for marketing activities also by checking certain boxes on forms that we use to collect your data to tell us that you don't want to be involved in marketing or by updating your marketing preferences via your account with us.

Please note that we may need to retain certain information for our own record-keeping and research purposes. We may also need to send you service-related communications relating to your studentship even when you have requested not to receive marketing communications.

13. WHAT WE NEED FROM YOU TO PROCESS YOUR REQUESTS

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

You do 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 excessive. Alternatively, we may refuse to comply with your request in these circumstances. We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14. CHANGES TO THIS PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

We may make changes to this Privacy Notice from time to time. We will post any changes to our site, or notify you of any material changes by email.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us by contacting us via the contact details at the top of this Privacy Notice.

15. FULL TIME STUDENTS

What information does EDSA Ltd collect in addition to SECTION 3 & 4 above?

EDSA Ltd will collect information about members/ students/ parents/ people with interest in the course of its business in providing services to the aforementioned people.

This includes details when you apply for a course at EDSA Ltd (weekend schools, workshops, masterclasses, audition events, events and full-time courses), when you enrol as a member or student and as you progress through your duration of membership/ studentship with us.

This will also include data received from external sources such as UCAS and external referees.

These details will include, but are not limited to, the following:

- Your contact details and other information submitted during the application and enrolment processes.
- Where else you may be applying to (other schools/ colleges)
- Qualifications/ grades received from academic or relevant vocational courses
- Other relevant information such as professional work experience, membership at clubs/societies relating to performing and other relevant information that supports the student application
- Contact details of your next of kin to be used in case of emergency.
- Medical info (where applicable)
- Details of your modules, courses, timetables, assessment marks and examinations.
- Financial and personal information collected for the purposes of administering.
- Fees and charges, loans, grants, scholarships and hardship funds.
- Photographs and video recordings for the purposes of recording workshops, classes, productions, assessments and examinations.
- Information related to the prevention of and detection of crime and the safety and security of staff and students, which includes, but is not limited to, CCTV recordings and data relating to breaches of EDSA Ltd's regulations; Details of your engagement with EDSA Ltd such as attendance information and use of electronic services such as classbiz, trello and other software in relation to your enrolment; Information gathered for the purposes of monitoring equal opportunities.
- Copies of passports and any identification data to ensure eligibility to receive financial support from the UK government and in compliance with right to study and identification requirements.
- Where applicable , this will also include details of visas and any other documents required for compliance with Home Office requirements, as well as biometric data for attendance purposes.
- Information you have directly provided for other services EDSA Ltd provides, such as Student Support (for the provision of advice, support and welfare), work experience and production participation

How will the information be used?

During the course of its activities, the EDSA Ltd will use your data to carry out its functions and to provide services to you as part of your student/member journey. Due to the vast amount of activities the EDSA Ltd undertakes as an academic institution relating to courses and academic progress, it is not possible to state every instance where your data will be used, however we are committed to ensure your data is only used in carrying out EDSA Ltd's business.

EDSA Ltd relies on different legal bases, as defined in the GDPR, to process your data. These are covered in the table below:

1	By commencing or enrolling as an EDSA Ltd student, EDSA Ltd will be required to collect, store, use, and otherwise process information about you for any purposes connected with teaching, support, research, administration, your health and safety and for other reasons deemed necessary for the performance of your contractual agreement with EDSA Ltd. We will also use your information for certain purposes after you cease to be a student. See GDPR Article 6(1)(b)
2	EDSA Ltd will obtain consent for you in order to assist with your pastoral and welfare needs (e.g. the counselling service and services to students with disabilities). See GDPR Article (6)(1)(a)
3	Processing of your personal data may also be necessary for the pursuit of our legitimate interests or by a third party's legitimate interests – but only where the processing does not fall within our core public function, is not unwarranted and will not cause a prejudicial effect on the rights on the rights and freedoms, or legitimate interests, of the student. See GDPR Article (6)(1)(f)
4	Processing of your personal data is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in EDSA Ltd (See GDPR Article 6(1)(e)) and for statistical research purposes (See GDPR Article 89)
5	Processing of special categories data is necessary for the statistical and research purposes in accordance with article 89(1) based on the duties in the Equality Act 2010 (see GDPR Article 9(2)(j)).

How will We process your information?

The below provides examples of how we use your information. Please note the numbers in brackets refers to the legal basis for processing:

- To administer your studies and record your academic achievements, which includes your course choices, examinations and assessments, publishing results and graduation programmes.
- To assist in pastoral and welfare needs for example the counselling service and services to students with disabilities
- To administer financial aspects of your enrolment as a student (such as payment of fees, debt collection). This will include parent/guardian contact details where relevant (such as name, address, contact email address, phone numbers) in order to process finances at EDSA Ltd.
- To provide or offer facilities and services to students (for example sporting facilities, computing facilities and Library services)
- To carry out investigations in accordance with academic and misconduct regulations
- To operate security , disciplinary, complaint and quality assurance processes and arrangements
- To produce management statistics and to conduct research into the effectiveness of our programmes of study as well as produce statistics for statutory purposes. (4), (5)
- To monitor engagement of students on Tier 4 Visas to ensure compliance with the terms of their sponsorship
- To maximise individual's opportunities to succeed through the use of learning analytics which are used to monitor individual's engagement with their studies. This will involve the processing of data such as attendance and assessment to develop an overall picture of engagement. Such processing will only take place where it is necessary for the pursuit of the legitimate interests of EDSA Ltd or the student and only where the processing is not unwarranted and will not cause a prejudicial effect on the rights and freedoms, or legitimate interests, of the student. Sensitive/special category personal data will only be processed where the EDSA Ltd is looking at trends and patterns analysis to produce management statistical reports. (3), (5)
- To monitor our responsibilities under equal opportunities policies (4), (5)
- For Higher Education Statistics Agency (HESA) purposes, EDSA Ltd has a statutory obligation to send some of the information we collect about you to HESA for statistical analysis purposes (4), (5)
- For Higher Education Statistics Agency (HESA) to conduct the Graduate Outcomes Survey after you graduate
- For Council Tax exemption purposes where personal information is collated at enrolment and shared with Local Authorities (3)
- Where your consent has been provided to EDSA Ltd register you to vote in the UK and General Elections (2)
- To make contact with you after you graduate about Careers Support, Alumni membership and events, new developments at EDSA Ltd and to update your communication preferences to ensure your experience of the EDSA Ltd's Alumni services is as rewarding as possible. (3)

- We share students' data with the Knights Templar School, Baldock (KTS) for students enrolled on courses administered at KTS. They are required to share information with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.
- They are required to share information about our pupils with the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.
- Data collection requirements:
To find out more about the data collection requirements placed on KTS by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/datacollection-and-censuses-for-schools>.
- For more information from KTS on their Data Protection and GDPR compliance, please visit: <http://www.ktemplar.herts.sch.uk/Data-Protection-G-D-P-R/>

Who is your information shared with?

Where necessary, personal information will be shared internally within and across other departments at the EDSA Ltd. Personal information is protected by EDSA Ltd and may be shared with external parties, only as required in the course of your studies.

The list below outlines the major organisations and most common circumstances in which EDSA Ltd will disclose your personal information. Where this is outside of the EEA, EDSA Ltd will only transfer information if it meets the conditions under the GDPR.

- To sponsors and parents where consent has been provided
- Other Education Institutions or organisations involved in the delivery of your course (i.e. KTS, University of Bedfordshire and examining bodies)
- Where applicable, professional bodies, such as Equity and Spotlight, in order to confirm your qualifications and accredit your course
- Work placement sites or educational partners involved in joint course provision
- The Student Loan Company to confirm enrolment, attendance and identity so students can access financial support (where applicable)
- Debt recovery and control companies in order to recover debt on behalf of EDSA Ltd, where internal debt recovery procedures have been unsuccessful
- Potential employers or providers of education whom you have approached (for example, where you have listed EDSA Ltd as a referee)
- Plagiarism detection service providers in accordance with EDSA Ltd regulations (where applicable)
- Local authorities for purposes of council tax exemption and voting purposes where it is necessary for the pursuit of the legitimate interests of the Local Authorities or the student but only where the processing does not fall within our core public function, is not unwarranted and will not cause a prejudicial effect on the rights and freedoms, or legitimate interests, of the student.

- EDSA Ltd's Student Council in order to provide you with the services offered by the Student body including, but not limited to, take part in democratic processes, benefit from representation services, join clubs and societies and receive communications. EDSA Ltd may also share sensitive information to monitor and promote equal opportunities.
- Organisations EDSA Ltd works alongside to provide graduation ceremony services to students, this includes, but is not limited to sharing details of names, courses and results in order to provide graduation ceremony programmers, typeset publications and video recordings of graduation ceremonies.
- Systems used in the course of your studies and during your time as a student, which are not managed directly by EDSA Ltd such as online library services
- Any services where you have provided direct consent

How long will your information be held?

EDSA Ltd will hold your information in line with the Information, Data Protection and Records Management Policy.

After you have graduated, EDSA Ltd is required to retain some of your information to provide statutory analytical data and to verify awards, provide transcripts of marks and to provide academic references for career support.

Keeping your information secure

EDSA Ltd is required under data protection legislation to keep your information secure, and measures are in place to prevent unauthorised access and disclosure of your information. Only relevant members of staff who require access to your records will be authorised to do so.

Systems and electronic files are subject to password restrictions and other security measures.

Paper files will be stored in secure areas with controlled access.

Some processing of your information may be undertaken on EDSA Ltd behalf by third party organisations. Organisations processing personal data on EDSA Ltd behalf are also bound by the GDPR and the EDSA Ltd has sought assurances from these organisations they ensure they are aware of their obligations under the GDPR and resulting legislation.

Your rights

You have the right to access your personal information, and where you have given direct consent to EDSA Ltd the right to object to the processing of your personal information, the right to withdraw that consent and the right to have your information deleted. Any requests or objections should be made in writing to:

Sarah Moore - Data Protection Officer

Emil Dale Studios

60 Wilbury Way

Hitchin

SG4 0TA

Your responsibilities

Throughout the course of your studies, you have a responsibility to keep your personal details up to date. You can update your details by emailing info@emildale.co.uk.

During your time as a student, you may have access to other individuals' personal data and you are legally obliged to handle this in a confidential, professional and responsible manner in line with data protection legislation and any other codes of conduct or ethics.

If you are made aware of an individual's personal information then you are expected to keep this confidential and to not tell anyone without the individual's prior consent (unless there is an exceptional circumstance). You should also not seek to actively obtain another individual's personal information to which you are not entitled.

In the instance where data protection legislation or a duty of confidence has been breached, disciplinary action will be considered.

PART-TIME STUDENTS

What Information does EDSA Ltd collect for our part time students/members?

This relates directly to our weekend school members and anyone applying for a workshop, taster day, masterclass, audition and/or event hosted by EDSA Ltd. For the purposes of this document, anyone under the aforementioned categories will be referred to as “student”

Parents and students

If you wish to enrol a student with EDSA Ltd, we will collect the following personal data:

- name, age, and date of birth of student
- parent or guardian’s name/ relationship to the student;
- contact and address details;
- emergency contact numbers;
- any medical conditions the student has
- Qualifications/ grades received from academic or relevant vocational courses
- Other relevant information such as professional work experience, membership at clubs/societies relating to performing and other relevant information that supports the student application
- Where else the student may be applying

If the student is over 16 years of age, please ensure that you have their permission to share these details with us.

EDSA Ltd will from time to time take photographs and film footage of students during class time for use in marketing and publicity material (both online and offline), and EDSA Ltd issues a waiver form at the point of enrolment to confirm your consent to participation in photographs and filmed footage. If you do not wish for your child to be photographed/filmed please let us know in writing by emailing info@emildale.co.uk or to FAO Operations Manager, Emil Dale Studios, 60 Wilbury Way, Hitchin, Hertfordshire SG4 0TA.

Payment information

Payments made by credit or debit card to EDSA Ltd can be made over the phone or in person. The staff member processing the card details will do so directly into the card machine and these details are not collect or store card details. After this point, the card is processed through a compliant portal and directly with your bank.

Payments made by BACS to EDSA Ltd are processed in-house by reviewing our bank details and inputting them into our invoicing system.

BACS details are either automatically transferred through an online software or directly by inputting this information manually from our bank statements. In both cases, EDSA Ltd does not collect, store or distribute banking information.

Sensitive personal data

The Data Protection Act gives special protection to sensitive personal data which will include information relating to health or sex life, race or ethnic origin, political beliefs or membership, philosophical or religious beliefs, trade union membership and information about the commission of offences and related proceedings.

You should only provide this information if it is required in response to a mandatory question on our websites, or if you are otherwise content for us to process this information

Automatically collected information

In addition, we may automatically collect information about the website that you came from or are going to. We also collect information on which pages of our websites you visit, IP addresses, the type of browser you use and the times you access our websites. However, this information is aggregated and is not used to identify you.

HOW WILL INFORMATION ABOUT YOU BE USED AND SHARED?

The information we collect allows us to:

- locate and get in touch with you about the relevant courses suited to you/ your child(ren)
- provide teaching services in singing, dance and drama and the organisation of performances
- administer our websites and provide customer services
- meet legal, regulatory and compliance requirements including the administration of EDSA Ltd's statutory obligations relating to children
- gather management information for research purposes and to form statistical and trend analysis;
- communicate with you
- send you surveys and competitions

- improve our websites and the products and services we offer to you and to provide you with online personalised services and targeted advertising including through the use of cookies when you visit our websites; and
- provide you with information about our products and services which may be of interest to you from time to time.

We may employ the services of a third party to help us in certain areas, such as website hosting, support and maintenance, and child protection issues. In some cases, the third party may receive your information. However, at all times, we will control and be responsible for the use of your information.

We may also use aggregated information so we can administer and improve our websites, analyse trends and gather broad demographic information. We may pass this information to third parties.

We may also disclose your personal data when we believe this is required by law, to enforce or comply our terms and conditions or to protect the rights, property, safety of EDSA Ltd, our customers or others.

TRANSFER OF YOUR INFORMATION OUTSIDE THE EU

EDSA Ltd will not transfer your information or data outside the EU

MARKETING COMMUNICATIONS

From time to time, EDSA Ltd may wish to provide you with information about EDSA Ltd's products and services (including by online targeted advertising, post, phone, email and text) which may be of interest to you.

If you do not wish to receive such information, please do not tick the box on the application form, click the link at the bottom of emails to unsubscribe or contact info@emildale.co.uk to unsubscribe at any time.

LINKS

Our websites may contain links to other third party websites over which we have no control. We are not responsible for privacy policies or practices of any websites to which you choose to link from our sites. We encourage you to review the privacy policies of those other web sites so you can understand how they collect, use and share your information.

SECURITY

We have implemented reasonable technical and organisational measures designed to secure your personal data from accidental loss and from unauthorised access, use, alteration or disclosure. However, the Internet is an open system and we cannot guarantee that unauthorised third parties will never be able to defeat those measures or use your personal data for improper purposes.

SALE OF THE BUSINESS

In the event that the business is sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

HOW TO CONTACT US

You are entitled to see the information held about you. You may review, correct, update or change your personal data at any time.

If you have any other questions about this policy or your personal data, please contact us on info@emildale.co.uk

Changes to our privacy policy

If our privacy policy changes in any way, we will place an updated version on our web pages. Regularly reviewing these ensures that you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

If we change the data we collect or how we process it, you will be informed of this in writing.

Other individuals

If you wish to contact us for other purposes, we ask for your contact details so we can respond to your queries.

This includes but is not limited to: hire of studio space, hire of teaching staff, hosting parties at our venues, or other such events produced by EDSA Ltd.

STAFF & SUBCONTRACTORS

If you wish to apply to work for EDSA Ltd, we will collect the following details:

- Your name
- Contact details (Address, email, phone number, CV with past employment details, references, travel requirements i.e. car owner, requires train travel etc), training qualifications.
- If you successfully obtain a job at EDSA Ltd you will be required to provide financial information in order for us to pay you
- EDSA Ltd may request details of references - it is your responsibility to make sure that the person is aware that you have forwarded his/her details for these purposes
- We will also collect details of any relevant criminal convictions and will need to see a copy of your DBS certificate before offering you a position. We will retain a copy of your DBS certificate on file.