



## Privacy Policy

### Definitions

For the avoidance of doubt, and for consistency in terminology, the following definitions will apply within this Policy:

#### *Data*

This includes both automated and manual data.

Automated data means data held on computer, or stored with the intention that it is processed on computer.

Manual data means data that is processed as part of a relevant filing system.

#### *Personal data*

Information which relates to a living individual, who can be identified either directly from that data, or indirectly in conjunction with other data which is likely to come into the legitimate possession of the Data Controller. (If in doubt, Dwan Academy refers to the definition issued by the Article 29 Working Party, and updated from time to time.)

#### *Sensitive Personal data*

A particular category of personal data relating to physical health of the subjects in relation to their activities with Dwan Academy.

#### *Data Controller*

A person or entity who, either alone or with others, controls the content and use of personal data by determining the purposes and means by which that personal data is processed.



### *Data Subject*

A living individual who is the subject of the personal data, i.e. to whom the data relates either directly or indirectly.

### *Data protection officer*

A person appointed by Dwan Academy to monitor compliance with the appropriate data protection legislation, to deal with subject access requests, and to respond to data protection queries from staff members and service recipients relevant filing system

### Introduction

This document outlines the data protection obligations of Dwan Academy. This includes obligations in dealing with personal data, in order to ensure that the organisation complies with the requirements of the relevant Irish legislation, namely the Irish Data protection Act (1988), and the Irish Data protection (Amendment) Act (2003).

Dwan Academy is committed to ensuring that your privacy is protected. As a data controller we determine the purpose and means of processing personal data. If information is provided by you, it will only be used in accordance to this privacy policy.

Dwan Academy may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 1<sup>st</sup> Aug 2020.

### **What we collect and how is the information used?**

So that we can provide you with our services and respond to your email/enquiry form requests, we ask you to submit the following information Parents name & email, child's name & age, address, child's medical information and date of birth and which class you are booking. This is used for contractual obligations and is needed in accordance to child welfare and protection, without this information we cannot fulfil the contractual



agreement. This data will be processed for us, by Class Manager, to be able to respond to the booking and therefore has been provided by you with your consent.

Enquires from social media or smartphones may contain analytical data such as geographical location depending on your settings for third party online services. Information shared through various social media channels may remain visible, even if the account is deleted.

Once we have provided your services or responded to your enquiry your details may be kept on our system to ensure that we can contact you if the need arises in the future and for historical reference to the enquiry. This will not be used for direct marketing.

Under no circumstances will we share your information with any other third parties unless you have asked us to, we have otherwise agreed this with you first or it is a legal requirement.

### **What we do with the information we gather?**

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping on a GDPR compliant database
- We may use the information to improve our products and services.
- Only the data controller is engaged in the processing and concluding of your order, including the processing of payments, and contractual services. By submitting your personal data you agree to this. The data controller has processor agreements in place in accordance to EU law.

### **How long do we keep the data?**

Proof of consent to marketing, agreement to the terms and conditions of Dwan Academy, along with consent for photography and filming will be kept indefinitely. All other sensitive data will be destroyed seven years after the end of the contractual agreement in accordance with Irish law.

### **Access to your data**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us. We want to make sure that your personal information is accurate and up to date. You may



ask us to correct or remove information you think is inaccurate. You may request details of personal information which we hold about you.

### **Database**

Dwan Academy use Class Manager a GDPR compliant system to maintain records, invoices and for contractual emails in accordance to the activities of the performing arts academy.

On leaving the academy, your details are deactivated and archived. Should you wish these to be deleted you will need to write to the school to request this action. Achieved details are kept for legitimate business purposes such as fraud and proof within legal cases.

Class Managers GDPR policy is available on their website [www.classmanager.com](http://www.classmanager.com)

### **Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online, in transit and storage.