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# Privacy Policy

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## Policies and Procedures

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**bbodance 2019-20**

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## 1. Introduction

The Privacy Policy sets out how bbodance controls and processes personal data in compliance with the General Data Protection Regulations (GDPR) which came into effect on 25<sup>th</sup> May 2018 whilst also demonstrating good practice.

bbodance are committed to protecting your personal information and ensuring that your personal data shall be:

- i. Processed lawfully, fairly and transparently
- ii. Collected for specific and legitimate purposes
- iii. Adequate, relevant and limited to the specified purposes
- iv. Accurate and up to date
- v. Kept only for the required period
- vi. Protected securely

The Privacy Policy sets out the following:

- The data we collect
- Purpose(s) for collecting the data, i.e. how your data will be used
- Lawful bases for processing
- The rights of individuals
- How your data will be stored

## 2. Scope

The policy applies to all personal data, provided to us online or via application forms, telephone, email exchange, letters or correspondence.

In accordance with the GDPR, personal data is defined as:

Any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.

## 3. The Data We Collect, How/Why We Use It and the Lawful Bases

When you visit our website, sign up to, participate in or facilitate any bbodance services, events, workshops/masterclasses, training courses or online content (e.g. e-newsletters) we may collect and store personal information about you. By providing your personal information we are able to deliver the services or products you have signed up for.

bbodance do **NOT** share your personal information with any third parties unless clearly stated. We do not sell your data and we do not buy data from third parties.

The table below identifies the data we collect, how and why we use it and the lawful basis for processing.

Where legitimate interests have been identified as the lawful basis, this legitimate interest is that of the individual; it is in the individual's interest for us to process this information so they can receive the products or services they have signed up for, fully participate in the activities or events they have signed up for and so they don't miss out on other similar opportunities in the future.

Data Subject (Who)	Data We Collect (What)	Events/Services/Function (Why)	Lawful Basis
Members Non-members Students	Name Contact details (email, phone, address) Date of birth Gender Dance school name & teacher Next of kin/emergency contact Dance qualifications/achievements	Events: registration, participation and engagement	Legitimate Interest
Members Non-members Faculty Examiners Students/ Candidates	Medical information (Special Category Data)	For the purposes of ensuring safe practice at events, exams and training programmes as well as recognition of special considerations and reasonable adjustments for examinations	Legitimate Interest (dietary requirements will be shared with caterers, medical info will be shared with examiners if relevant to special considerations/reasonable adjustments)
Members	Name Contact details (email, phone, address)	Examinations: enquiries, arrangement of examination sessions, centre approvals	Legitimate Interest
Students/ Candidates	Name Gender Date of birth Qualification (exam taken and result)	Examinations: results certification	Legal Obligation (shared with Ofqual)
Members Non-members Students Faculty Examiners	Name Contact details (email, phone, address) Payment details VAT number (for paying invoices)	Finance: payments for products and services, payments of invoices and expenses	Contract
Trustees	Name Contact details (email, phone, address) Date of birth NI number 2 forms of ID Other business interests	Governance	Legal Obligation (shared with Companies House, Charity Commission, ASIC)
Public	Name Contact details (email, phone, address) CV References	Human Resources: employees, faculty and examiner recruitment	Legitimate Interest
Employees Faculty Examiners	Name Contact details (email, phone, address) Next of kin/emergency contact Date of birth Proof of right to work	Human Resources: employees, faculty and examiner appointment and management	Contract

	References DBS certificate number		
Employees	Name Contact details (email, phone, address) Date of birth Bank details NI number Salary Student loan info Employment dates Statutory entitlements	Human Resources: payroll and pensions	Contract and Legal Obligation (shared with Payroll provider and HMRC)
Members Non-members Students Employees Faculty Examiners	Name Email Membership status Relevant interests	Marketing: bbodance news, events, products and services	Legitimate Interest
Members Non-members	Name Contact details (email, phone, address) Date of birth Dance qualifications & achievements DBS certificate number	Membership: enquiries, applications, renewal, CPD training and certification	Legitimate Interest
Members Non-members	Name Contact details (email, phone, address) Public liability insurance information	Operations: tenancy of offices and letting of studio and meeting room spaces	Contract
Members Non-members General public	Name Contact details (email, phone, address)	Online shop: fulfilment of orders	Contract (shared with distributor)
Members Non-members Students	Name Contact details (email, phone, address) Date of birth Gender Dance school name & teacher Next of kin/emergency contact Dance qualifications/achievements References (TQ only) DBS certificate number (TQ only)	Training: Level 3 and Teaching Qualifications application, registration and participation	Legitimate Interest

### 3.1 Cookies

We use cookies on our website to optimise site functionality and give you the best possible experience.

The cookies we use collect the following information:

- Requested URL (Uniform Resource Locator)
- IP (Internet Protocol) address (this may or may not identify a specific computer)
- Domain name from which you access the internet

- Referring URL
- Software (browser/operating system) used to access the page
- Date and time pages were visited

bbodance do not share any data obtained via cookies with any third parties.

For more information, please see our [Cookie Policy](#).

## 4. Your Rights

The GDPR provides the following rights for individuals:

- i. The right to be informed
- ii. The right of access
- iii. The right to rectification
- iv. The right to erasure
- v. The right to restrict processing
- vi. The right to data portability
- vii. The right to object
- viii. Rights in relation to automated decision making and profiling

For more information about your rights and how to exercise them, please contact the Data Protection Officer.

### 4.1 The right to be informed

You have the right to be informed about the personal information we collect and store and how we use it. This information is provided in the Privacy Policy.

### 4.2 The right of access

You have the right to access the information we hold. The right of access allows you to be aware of and verify the lawfulness of the processing.

### 4.3 The right to rectification

You have the right to have your personal information rectified if it is incorrect or incomplete.

### 4.4 The right to erasure

Also known as the right to be forgotten. This right is to enable you to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

### 4.5 The right to restrict processing

You have a right to restrict or “block” processing of your personal data.

### 4.6 The right to data portability

Where the processing is based on your consent or for the performance of a contract; and when processing is carried out by automated means, you have the right to data portability. This means you can obtain and reuse your personal data for your own purposes across different services.

## 4.7 The right to object

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling);
- processing for purposes of scientific/historical research and statistics.

## 4.8 Rights in relation to automated decision making and profiling

bbodance can only carry out this type of decision-making where the decision is:

- necessary for the entry into or performance of a contract;
- or authorised by Union or Member state law applicable to the controller;
- or based on the individual's explicit consent.

# 5. Data Recording, Storage and Retention

## Accuracy

In accordance with the Data Protection Principles set out above, it is necessary to ensure that all data is collected and recorded accurately.

### Phone

For information taken over the phone, it should be repeated back to the data subject for confirmation of accuracy.

### Person

For information taken in person, it should be shown to the data subject for confirmation of accuracy.

### Email

For information taken via email, the email should be replied to and should contain the information you've recorded, asking the data subject for confirmation of accuracy.

### Paper

For information collected via a paper document, which is to be transferred to an electronic file, the data subject should receive an email containing the data inviting them to confirm the accuracy of the data.

### Website

For information collected via a web-form, a summary of the data provided will be given to the data subject for confirmation before submission.

## Storage

We use a variety of procedures and security measures to ensure that all reasonable steps are taken to protect your personal data from unauthorised access, use or disclosure.

The majority of personal information we process is stored electronically on computer systems which have carefully controlled access stored in secure facilities. Our LAN is protected by a managed firewall meaning we are able to see if anyone is trying to “hack” into our network and our servers and PCs are supplied with automatic updating antivirus technology.

In some instances, your personal data may be stored on paper. These files are stored in a secure facility with limited access.

## Breach of Protection

If anyone is concerned that there has been a breach of security relating to data protection, they should raise their concerns with the Data Protection Officer immediately.

## Retention

### Financial Records

Data relating to financial records will be kept for 7 years in accordance with our legal obligations.

### Membership Records

Data relating to our members shall be kept for no longer than is necessary to deliver the purpose for which it was collected originally.

### Examination and Qualification Data

Data relating to examinations and qualifications; candidates, teachers, examiners, results and qualifications, will be retained indefinitely in accordance with our regulatory obligations.

### Human Resources

For data relating to bbodance employees, faculty, examiners, representatives and volunteers, it will be retained for 3 years after they cease to be engaged with the organisation.

For data relating to candidates for employees, faculty, examiners, representatives and volunteers where there services were not engaged, data will be held for 6 months.

## Archiving

At the end of the data retention periods set out above, or if the data subject utilises their right to erasure, data will be deleted and destroyed. For data stored electronically, it will be deleted in a manner that is unrecoverable. For data stored on paper, the files will be shredded.

In some instances it is necessary to archive data rather than destroy it. In these instances, data stored electronically will be archived on a secure server with access restricted to the Data Protection Officer. For data stored on paper, it will be archived and locked in a secure facility with access restricted to the Data Protection Officer.



## 6. Policy Review

In the interest of legal compliance and best practice, the Privacy Policy will be reviewed annually.

Date for review: May 2020

## 7. Contact Information

Data Protection Officer

Debbie Pellett, Head of Engagement and Participation

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