



# Privacy Policy

Effective date: 20th May, 2018

## Introduction

Parents / Guardians / Carers enroll their child / children in the Da Silva Pearce School of Performing Art (DSP Performing) to attend on Saturday mornings during term-time where they follow a Performing Arts curriculum of Acting, Dance and Singing. Our curriculum is modeled on Musical Theatre and related styles. Fees are paid via Direct Debit only on a monthly, termly, quarterly or annual basis. Different rates apply depending on the frequency of payment. The rate for fees remains fixed for a minimum of three years and often extended beyond to reward loyalty to our school.

As a school encompassing age ranges from 5 to 17, we have a legal and moral duty to ensure the safety and well-being of our students. The personal information that we collect via the application form is used only for this purpose and naturally includes parental contact information, names and dates of birth of the child and any medical information or special needs that might impact on the child's ability to access our curriculum. All such information is treated in the strictest confidence and is only intended for internal use.

We don't sell ads, and especially don't sell or share your data with advertisers or other marketing companies!

Many of our clients often don't realize that even with a simple business model like ours, we do need to rely on third-party services (that we administrate), to securely process payments, store and organize your data, send out our email newsletters etc. If you have any concerns, or are simply curious to have us elaborate on any of the points below, [please get in touch](#). We believe strongly in the importance of these General Data Protection Regulation (GDPR) principles and want to do a good job following them – so your feedback is always appreciated.

Da Silva Pearce Ltd ("us", "we" or "our") operates the Da Silva Pearce School of Performing Art commonly referred to as "DSP Performing". Our website is located at [www.dsp-performing.org](http://www.dsp-performing.org) is used purely for the purposes of information to our existing and prospective clients and contacting the school. No personal data is saved on our website.

This document informs you of our policies regarding the collection, use, and disclosure of personal data when you enroll your child in our school and the choices you have associated with that data.

We use your data to provide and improve the operation of our school and to ensure the safety and well-being of your child when s/he is in our care. By enrolling in the school, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, available at [www.dsp-performing.org](http://www.dsp-performing.org)

## Definitions

### Personal Data

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

### Usage Data

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

### Cookies

Cookies are small pieces of data stored on a User's device.

### Data Controller

Data Controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your data.

### Data Processor (or Service Providers)

Data Processor (or Service Provider) means any person (other than an employee or founder of the Data Controller) who processes the data on behalf of the Data Controller. We use the services of various Service Providers in order to process your data more effectively.

### Data Subject

Data Subject is any living individual who is the subject of Personal Data.

### User

The User is the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

### Information Collection And Use

We collect several different types of information for various purposes to provide and improve our Service to you.

## Types of Data Collected

### Personal Data

While using our service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Information about your child
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send, or by contacting us. However, please note that by opting out of our communications you may miss out on important information pertaining to your child.

## **Usage Data**

We may also collect information how the service is accessed and used (“Usage Data”). This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

## **Tracking & Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- To track which areas of our region access our website and the times of days when traffic to the website is heaviest. We cannot identify the user individually from this information.
- To track the effectiveness of our electronic communications including if our newsletters are being received and the rate of ‘click throughs’ to our website.

## **Use of Data**

Da Silva Pearce Ltd uses the collected data for various purposes:

- To provide and maintain our operation
- To notify you about changes to our operation
- To provide customer support
- To gather analysis or valuable information so that we can improve our operation
- To monitor the usage of our operation
- To detect, prevent and address technical and operational issues
- To provide you with news, and general information about classes and events

## **Retention of Data**

We retain your information for a maximum of 10 years after leaving DSP Performing for the following reasons.

- From time to time, students like to take a short break and then return to us to continue their studies.
- Past students contact us for a reference to apply for under-graduate courses in Performing Arts
- To address any issues that may come to light after the student has left DSP Performing.

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## **Transfer Of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers outside our organisation such as third party organisations we use in the administration of our organisation.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Da Silva Pearce Ltd will take all reasonable steps necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an outside organisation unless there are adequate controls in place, including the security of your data and other personal information.

## **Disclosure Of Data**

### **Legal Requirements**

Da Silva Pearce Ltd may disclose your Personal Data in the belief that such action is necessary to:

- To comply with a legal obligation
- To protect and defend the rights or property of Da Silva Pearce Ltd
- To prevent or investigate possible wrongdoing in connection with running of DSP Performing
- To protect the personal safety of users and our students
- To protect against legal liability

### **Security Of Data**

The security of your data is important to us, but remember that while we do everything possible to keep your Personal Data safe at all times, no method of transmission over the Internet, or method of electronic storage can be 100% secure.

### **“Do Not Track” Signals**

We do not support Do Not Track (“DNT”). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

### **Your Rights**

Da Silva Pearce Ltd aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

Any changes to your personal data can be made via email to [admin@dsp-performing.org](mailto:admin@dsp-performing.org) or via our the [Contact Form](#) on our website

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

You have the right:

- To access and receive a copy of the Personal Data we hold about you
- To rectify any Personal Data held about you that is inaccurate
- To request the deletion of Personal Data held about you

You have the right to data portability for the information you provide to Da Silva Pearce Ltd. You can request to obtain a copy of your Personal Data in a commonly used electronic format so that you can manage and move it.

Our understanding of the EU's GDPR law is that we would have up to 40 days to gather this information and send it in response to your request. Please note that we may ask you to verify your identity before responding to such requests.

### **Service Providers**

We may employ third party companies and individuals to facilitate our organisation ("Service Providers"), to provide the organisation on our behalf, to perform organisational services or to assist us in analyzing how our organisation is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **Communication**

- **Website** - is provided by [one.com](https://one.com) No personal data is stored on our website. When a user makes an online application to enrol their child or fills out a form on our site, the data is sent directly to the Principal (Michael Da Silva Pearce) for the purposes of record-keeping. [one.com](https://one.com) does not have access to this information. Privacy policy: <https://help.one.com/hc/en-us/articles/360000253649-How-does-One-com-comply-with-the-GDPR->
- **Facebook Page** - We use our [Facebook Page](https://www.facebook.com/privacy/explanation) to notify parents, students and the general public about forthcoming events. Privacy Policy: <https://www.facebook.com/privacy/explanation>
- **MailChimp** – used for communicating updates about our classes and events to all of our users. Privacy policy: <https://mailchimp.com/legal/privacy/>
- **Zoom** - used for online classes Please refer to their Privacy and Security page <https://zoom.us/docs/en-us/privacy-and-security.html> In the interests of transparency when working with children, all classes are automatically recorded. A warning is given online before the recording begins.

### **Backups & Storage**

- **Dropbox** – We use a Dropbox to securely store backups of our website's database (which includes user data as well). This information is only viewable to the Principal, Company Secretary and Centre Manager. Your personal information is only shared with other staff on an as needs basis. Privacy policy: <https://www.dropbox.com/privacy>
- **Googlesheets** - We use Googlesheets to monitor your child's attendance in classes and to organize groups for shows and other events. Only your child's name and date of birth are stored here and only DSP Performing Staff have access to these sheets via a secure link. Privacy Policy: <https://policies.google.com/privacy?hl=en-GB>

## **Analytics**

We use the following third-party Service Provider to monitor and analyze the use of our Service.

- **Google Analytics** – a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>

## **Payments**

We use a third-party service to process direct debits in respect of our fees and other expenses incurred by the user.

We will not collect or store your bank details. That information is provided directly by you to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. This information is never shared with Da Silva Pearce Ltd.

- **GoCardless.com** – Privacy Policy can be viewed at <https://gocardless.com/downloads/legal/privacy-policy-v0417-1.pdf>

We do permit fees and other expenses to be paid via Bank Transfer or Standing Order to our business account for those users who prefer not to avail themselves of the Direct Debit Service.

For internal accounting and customer support, we use the following accounting service:

- **Intuit Quick Books** – this service is linked to our Business Bank Account and tracks income and expenses which allows us to assist customers with their billing-related customer inquiries. Their Privacy Policy can be viewed here: <https://security.intuit.com/index.php/privacy>

## **Links To Other Sites**

Our website and newsletters etc may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **Children's Privacy**

We take your child's privacy very seriously. Your child's details are never shared with third parties with the exception of casting directors for purposes of auditioning for shows and other media. Even if you have agreed in the application form that your child's information may be shared for casting purposes, we always contact you first before submitting such information to ensure that you are still happy for us to do so.

We may also use photography or video of your child for publicity purposes such as adverts or on our own website. You have the option in the application form to request that your child's image is not used; and you may withdraw permission at any time by [contacting us](#)

## **Testimonials / Reviews**

When users reach out to us with positive feedback, we'll occasionally share a snippet of that message on our website or general advertising. At such times, we do not identify you or your location or quote any part of the review that may identify you.

If you comment, on our Facebook Page, you are naturally subject to Facebook's privacy policy; and we strongly advise you to check your own privacy settings.

## **Changes To This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us:

- By email: [admin@dsp-performing.org](mailto:admin@dsp-performing.org)
- Via our contact form on our website: <http://dsp-performing.org/contact.html>