

Peploe-Williams Academy Ltd is a Data Controller for the purpose of the Data Protection Act 2016/679 ("GDPR"). The Academy has notified the Information Commissioner's Office of the types of personal information it processes and the purposes for which it does so.

The Information Commissioner's Office is the independent body responsible for overseeing the Data Protection Act and maintains a public register which contains the name and address of Data Controllers with a description of the kind of processing they do. Anyone can access this register and if you wish to view the Academy's entry you can access it via the Information Commissioner's Office Website. [www.ico.gov.uk](http://www.ico.gov.uk) – We are registered with the ICO under registration number ZA755536.

We ensure that any personal information provided by you to us will be processed in accordance with the GDPR and our Privacy Policy set out below. We've tried to be as clear as we can be and to avoid unnecessary jargon, while including all the relevant information. The Peploe-Williams Academy aims to offer a transparent view as to how we use and store personal data in line with the GDPR.

We respect the privacy of each user accessing our customer CRM, our social media, and the Website ("you," "your") and are committed to protecting your privacy.

'You may at any time request the personal information that we hold, you may also request for your personal details to be deleted from our database or to unsubscribe to our marketing emails' that you receive from our software, email responder.

Also if you have questions about the use of your personal information, the Information Commissioner's website offers useful advice and guidance.

Under the Data Protection Act 2018, we have a legal duty to protect any information we collect from you. Peploe-Williams Academy respects your privacy. The information that you provide us with, or that is gathered automatically helps us to monitor our service and provide you with the services that you are entitled to as a student of the Academy or visitor to our website.

## **WHAT INFORMATION DO WE COLLECT & WHAT DO WE DO WITH IT?**

We do not collect personal information about you when you visit the website unless you choose to provide it to us to take advantage of a specific service, for example when you complete an online form.

Your basic contact details: We collect your name, email address, postal address, telephone number and website address so that we can contact you about your course(s), training, shows and resident companies and choirs that you may be a member of and keep in touch with you from time to time.

- Your usage details: We collect your usage data which may include your IP address, Peploe-Williams Academy website username and password, browsing history, searches you've made on our website, any enquiries you've made, etc. This data may be processed for the purposes of analysing the use of our website and services. The legal basis for this processing is for the purposes of our legitimate business interests, namely monitoring and improving our CRM, operation systems, website, affiliated software, video conferencing software and services.
- Your payment details: We require your payment details, and debit/credit card details so that we can collect payment for your fees for the academy curriculum, training, shows and resident companies, summer schools, workshops and choirs that you may be a member of. You can choose to store this on our Think smart software (to view their privacy policy [click here](#)), website, and it is securely managed by Stripe (to view their privacy policy please [click here](#)), Go Cardless (to view their privacy policy please [click here](#)) and Paypal (to view their privacy policy please [click here](#)).

## **YOUR PERMISSIONS AND CHOICES**

You can change your registration data and your email preferences at The Peploe-Williams Academy at any time in our CRM portal or our website.

You may choose at any time to change the information that you provided when you registered, including your email address, Academy, CRM, password and any stored payment cards, and you can do this by contacting us. You can also change which emails you receive or ensure that you do not receive any emails from Peploe-Williams Academy by unsubscribing.

## **WHERE WE NEED YOUR CONSENT?**

We will seek your or your parent's permission if we decide to post any photographs of you on any of our marketing materials (including our prospectus, website, social media platforms); you may withdraw your permission should you wish. (see separate Consent & Media form).

You do not have to give us details about your race, religion or ethnicity if you do not want to. If you do, we will use this to help run the school (e.g. if your religion means that you have certain dietary requirements) and to monitor equal opportunities. You can ask us to delete this information at any time.

## **HOW LONG IS YOUR DATE HELD?**

Any personal data you give us, or that we collect when you use Peploe-Williams, will be retained by us for as long as it's needed to perform its function. Registration data is held permanently unless you notify us that you no longer wish for us to keep your details. There's no one-size-fits-all time limit, but we regularly review the data we hold to ensure it is still necessary.

## **HOW WE USE YOUR PERSONAL DATA?**

We use your personal data for the following purposes:

- provide you with an up to date, efficient and reliable service
- ensure we keep our CRM, your portal with PWAcademy, and website safe and secure
- carry out our obligations in our terms and conditions and to provide you with the information, courses and services that you request from us
- provide you with information about other services, competitions, surveys or courses that you have already purchased or made enquiries about
- to provide you with information or services that we believe may be of interest to you
- provide you with an enhanced or more personalised experience when using our service
- provide customer support services to you
- notify you of any changes to the service, our terms and conditions, policies or your account
- create and manage your online Portal account with us
- measure and ensure that we are providing You with relevant courses, offers and advertising
- fulfil delivery of a course or service to you via physical, or virtual means

We will only collect personal details appropriate to the service you require. In some areas, this may simply mean registering your name, address and email details. Other on-line forms will require more information.

## **WHAT DO WE USE PERSONAL INFORMATION FOR?**

There are various reasons that we need to collect personal data. For example, we may need your contact details for correspondence purposes. Similarly, we may need information because of legal requirements.

Subject to your agreement, we may contact you to let you know about new online services, or get your feedback on how we're performing. In any event, we will only ever ask for information that is absolutely necessary and does not constitute an invasion of privacy.

We do not share any information we collect about you with other organisations.

## **ALLOWING YOUR DETAILS TO BE USED ACROSS OTHER ACADEMY DEPARTMENTS**

We are committed to improve the quality of people's experience when they contact us. By allowing your details to be used across other Academy departments, you are allowing us to re-use information to minimise the time taken when you contact us in the future.

Please note that in agreeing to share these details you have not forfeited your rights as prescribed under the Data Protection Act 2018.

Your service entitlement from the Academy will not be affected should you decide not to allow your data to be shared in this way.

## **SHARING AND DISCLOSING YOUR INFORMATION**

Depending on the purpose for which we originally obtained your personal information and the use to which it is to be put, information may be shared with other departments/organisations. If requested we may submit your information to law enforcement or government authorities including other local authorities.

In most cases we will not disclose personal data without consent. However, there are situations where consent would not be required such as:

- Where the Academy is required to provide the information by law
- Where the information is needed to prevent or detect a crime
- Where the Academy is obliged to publish the information by law
- Where disclosure is in the vital interests of the person concerned

## **EMAIL MESSAGES**

We are keen to ensure that we are providing our customers with services that they need. Consequently, you may receive occasional e-mail messages from Peploe-Williams Academy about Academy news, shows, events or other information which we think you may find interesting, if you have provided your email address to us for this purpose.

## **INFORMATION COLLECTED AUTOMATICALLY TO IMPROVE OUR SITE**

We collect web statistics automatically about your visit to our site based on your IP address. This information is used to help us identify how many visitors we have to the site and which pages have been accessed.

This information does not identify you personally.

## **COMPETITIONS/PROMOTIONS**

From time to time we operate competitions and promotions. Participation in these is optional. Information submitted might be submitted to third parties: check individual competition rules. You may also be given an option to sign up for a free email newsletter.

## **SURVEYS**

On occasion we may conduct online surveys. This is used to gauge our service, collect demographic information and other information that we may find useful. These surveys are optional. We may share non-personal, aggregated information with third parties.

## **ACCESS TO YOUR INFORMATION**

Individuals can find out if the Academy holds any personal information by making a 'subject access request' under the Data Protection Act.

To make a request to the ICO for any personal information we may hold you need to put the request in writing addressing it to the Data Protection Officer.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting the Data Protection Officer.

#### **HOW WE STORE YOUR PERSONAL DATA?**

Your data is stored by our web hosting company Fasthosts, our CRM provider Thinksmart software, our teaching provider, Zoom icloud, Google classrooms, dropbox, our email service providers Drip.com, and SMTP Thinksmart. Unless you have turned cookies off, some data technology and social media companies (such as Google and Facebook) store your cookies; they do not have access to any personal information about you beyond your browsing habits.

The way we store and process data is compliant with the UK 1998 Data Protection Act, the 2018 EU General Data Protection Regulation ("GDPR"), and other relevant pieces of legislation. We always aim to comply both with the spirit as well as the letter of the law and to be responsible with your data.

#### **LINKS TO OTHER WEBSITES?**

Our website contains hyperlinks to websites owned and operated by third parties. This Privacy Policy does not apply to those other websites. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk. We urge you to read other sites privacy policy.

## **PEPLOE-WILLIAMS ACADEMY ONLINE PERFORMING ARTS LEARNING SUPPLEMENTARY PRIVACY POLICY FOR PARENTS AND STUDENTS. (VPLC)**

#### **INTRODUCTION**

We are continuously committed to protecting and respecting the privacy of our parents and students and our staff. In light of Covid-19, and government mandated school closures, the School's physical premises are closed. However, we remain fully functioning educationally and we have now transitioned to providing online performing arts teaching via our virtual performance learning classes ("VPLC").

Please read this supplementary privacy notice in conjunction with this privacy policy, and the School's Photo and Media Consent Form ("Existing Notices"). This supplementary notice (together with the Existing Notices) sets out the basis on which any personal data we collect from parents and students is handled by us when taking part in our VPLC.

#### **USES MADE OF THE INFORMATION**

To ensure that our performing arts learning content is presented in the most effective manner, and our students' online experience is as appropriate as possible, delivery of video, and performance content via our VPLC will involve the processing of personal data, including in the following contexts:

Students participating in live, online, face-to-face interactive classes and tutorials with other students and teachers; students participating in live video calls and tutorials with other students and teachers; online chat services; one-on-one sessions between teachers and students in specific cases for example for audition, wellbeing, and one to one tuition; student to student interaction; peer review: teachers reviewing other teachers' lessons for quality assurance; recordings of the remote performance classes being made by the School, or 3rd parties relevant to class tuition, and stored on the VPLC ("Recordings"); and recordings being shared between Peploe-Williams Academy staff.

## **BASIS OF PROCESSING**

The School's processing of personal data via the VPLC is necessary for its legitimate interests, which in this context includes the following purposes: to deliver performing arts training services to our students and to monitor our students' progress and performing arts needs; to promote and fulfil the objects and interests of the School and ensure its efficient management and administration; and to safeguard our children's welfare and provide appropriate pastoral care whilst they are taking part in the VPLC.

Some of this activity undertaken via the VLP the School will need to carry out in order to fulfil its legal rights, duties or obligation – including those under a contract with its staff, or parents of pupils.

## **THIRD PARTY SOFTWARE PLATFORMS**

We use third party software platforms including, but not limited to, Google Classroom, Zoom, Google hangouts, Vimeo, and media editing software to facilitate our VPLC; please also read the privacy notices, and applicable terms and conditions, provided by any such third parties. The third party notices will set out the data collection, use, and retention for the service they are providing. This notice only sets out how the School uses personal data for its VPLC.

## **HOW LONG WE KEEP PERSONAL INFORMATION**

The Recordings shall be retained by the Academy for so long as the VPLC is maintained by the School and thereafter in accordance with the School's Media & Consent Policy.

## **CHANGES TO THIS POLICY**

The School reserves the right to update this supplementary notice at any time. You will be notified of any material change.

## **COOKIES**

The Website uses cookies to differentiate you from other users and to help provide you with the best experience we can. For further information about the cookies we use and for what purposes they are used, please refer to our Cookie Policy which we will make available to you if you request it.

You can usually switch cookies off by adjusting your browser settings to stop it from accepting cookies (Learn how here). Doing so however will likely limit the functionality of our's and a large proportion of the world's websites as cookies are a standard part of most modern websites.

## **POLICY CHANGES**

By using our site you agree to accept this privacy policy and are aware that our policy may change with time. Any changes to this policy will appear on the PWA website and parent portal.

## **HOW TO COMPLAIN**

You can also complain to the ICO if you are unhappy with how we have used your data.  
The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113