



Privacy Policy

Introduction

In order to comply with the General Data Protection Regulation (GDPR) coming into force on 25th May 2018, this privacy policy has been created to ensure that data is processed in a fair, lawful and transparent manner. This policy will explain how personal data is collected from parents, guardians, carers and pupils of Dundee Drum Academy, how consent is given, what is done with data, and how consent can be withdrawn.

Data Protection Principles

Under the GDPR, the data protection principles set out the main responsibilities for individuals and organisations which process personal data.

Article 5 of the GDPR requires that personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to individuals; collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;

- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Individual Rights

Individuals have various rights under the data protection legislation. These rights are as follows:

- **The right to be informed:** the obligation to provide fair processing information to data subjects at the time their personal data is obtained.
- **The right of access:** individuals have the right to obtain confirmation that their data is being processed, access to their personal data, and other information which largely corresponds to the information on this privacy notice. Any request must be dealt with within one month of receipt (subject to extension by two months for complex or numerous requests).
- **The right to rectification:** personal data must be rectified where it is inaccurate or incomplete and must be corrected within one month of request (subject to extension by two months for complex requests).
- **The right to restrict processing of personal data:** where this right applies, the data controller can only store the data, but not further process it. This right applies in certain circumstances including until any issues regarding its accuracy are resolved; where the individual objects to processing, whilst the data controller considers whether its legitimate interests override those of the individual; where the processing is unlawful; if the individual requests restriction over erasure; and if the data is no longer required but the individual requires its retention for legal purposes.
- **The right to object:** this right applies to processing based on legitimate interests; to direct marketing; and to processing for scientific/historical research and statistics. Data subjects have the right to object at the point of first communication.
- **The rights on automated decision making and profiling:** individuals have the right not to be subject to a decision when it is based on automated processing and where this has a legal effect or a similarly significant effect on the individual. Where this is the case, individuals must be able to obtain human intervention, express their point of view and obtain an explanation to challenge it. There are exceptions to this right including if the decision is necessary for entering into or performing a contract with the individual or where based on explicit consent.
- **The right to data portability:** this right allows individuals to obtain their personal data from the data controller and reuse it for their own purposes across different services. This right is limited to when processing is carried out by automated means. Where the right applies, the data must be provided within one month (subject to a two month extension for complex requests).
- **The right to erasure/to be forgotten:** this is not an absolute right. It applies in certain circumstances including where the data is no longer necessary for the purpose for which it was originally collected/processed; the individual withdraws consent; where the individual objects and

there is no overriding legitimate interest for continuing the processing; the data was unlawfully processed; or to comply with a legal obligation.

Data Collected by Dundee Drum Academy

Identity of Data Controller

All data is collected and processed by Christopher Allan Morris, Instrumental Instructor at Dundee Drum Academy. He can be contacted via any of the following ways:

Telephone: 01382 827539 (mobile: 07419756573)

Email: chris.morris@dundeedrummy.co.uk

Postal address: Dundee Drum Academy, 83 Strathmartine Road, Dundee, DD3 7RY

Initial Contact Form

When beginning lessons at Dundee Drum Academy, data is requested via a contact form (this must be filled out by a parent/guardian for pupils under the age of 18). The data requested is as follows:

- **Name of pupil:** this is required so that we can match all other information on the form to the relevant pupil.
- **Name of parent/guardian:** this is used as a first point of contact in case of the requirement to contact for any reason.
- **Address:** this is required as part of Dundee Drum Academy's children and vulnerable adults protection policy, which can be viewed online at www.dundeedrummy.co.uk. Dundee Drum Academy does not send mail to any postal address provided by a pupil or parent/guardian.
- **Email:** this is used to give another form of contact.
- **Phone number:** a requirement for those who are leaving their children at Dundee Drum Academy so that we have a form of emergency contact.
- **Known medical conditions:** this is to ensure pupils' time in lessons is as safe as possible and that Dundee Drum Academy is able to support any pupils with additional needs.

Photography/Video Consent Form

A form is given out four times a year to ask parents/guardians for permission to take and use photographs and/or videos of Dundee Drum Academy pupils and use them online. The form asks for:

- **Name of pupil:** so that we can determine the pupil that consent is being given/denied for.
- **Signature of parent/guardian:** to express the approval/denial of consent.

How Data is Processed

Contact forms and consent forms are kept in a private folder at the main premises, and also scanned and kept digitally on an external hard drive. Only the data controller has access to both of these and this duty is not shared with any other individual.

Pupils' names are also recorded in the following:

- **Lesson timetable:** to keep track of which pupils are coming on which days/times.
- **Attendance records:** to log whether or not pupils arrived for their lesson, and to record any reason for not attending, if given. This records the exact time and day the lesson was scheduled to take place.
- **Pupil progress records:** this is kept handwritten in a small notebook to keep track of what pupils are currently studying and their next goals.
- **Account records:** this records payments given for lessons and typically includes the pupil's name and how much money was given for a lesson/block of lessons.
- **Event programmes:** a pupil's first name may appear on a programme in any event they take part in which is organised by Dundee Drum Academy.

In the case of photographs or videos, permission must first be obtained from a parent/guardian to take these, and also to use them. Permission is requested on a seasonal basis as described on the previous page. When permission is given, photographs and videos may be displayed alongside the first name of a pupil on:

- **Social media pages:** Facebook, Twitter and YouTube.
- **Dundee Drum Academy website:** www.dundeedrumacademy.co.uk
- **Promotional material:** leaflets, posters, etc.

How Long Data is Stored For

All information provided via a contact form is securely destroyed/deleted when a pupil finishes tuition with Dundee Drum Academy. However, in accordance with advice given to small businesses by government, a record of payments given to Dundee Drum Academy for lessons and other products/services is retained for three years before deletion.

Information Passed on to Third Parties

It is a strict policy that personal data is never passed on to third parties except in the case of a breach of Dundee Drum Academy's children and vulnerable adults protection policy. In extreme cases where there is a strong possibility of threat to the health and safety of a child or vulnerable adult (this could involve any form of abuse as described in the protection policy; neglect, physical injury, sexual or emotional abuse), any information Dundee Drum Academy holds about a pupil may be passed on to:

- **Police Scotland**
- **Dundee Social Work Department**
- **Dundee Childcare and Protection Service**

Data Protection Public Register

Dundee Drum Academy is registered with the Information Commissioner's Office (ICO) and can be found on its public register. For more information please visit www.ico.org.uk.