

Sammy's School of Dance - Privacy Policy

Updated May 2018

Sammy's Dance take our students data seriously, so we have written this short policy to keep you in the loop of exactly how we hold, store and use the personal information you provide us. All information is centrally held via DanceBiz software which is provided by ThinkSmart. It is accessed via Tablet, smart phone or laptop by teaching staff at Sammy's dance. Each staff member has an individual login and all devices have a passcode, meaning you can be doubly sure your information is safe.

Holding Statement From DanceBiz:

Recently the UK Commissioner of The ICO, Elizabeth Denham, stated that her organisation are looking for businesses to show intent and commitment to complying with the new privacy law and I am writing to you to inform you of our progress since I last communicated with you on the subject of GDPR which as you know comes into UK law as of 25th May, 2018.

After extensive cyber security work, we have proved that the software is incredibly secure and safe. The security results have shown that the 8 years of constant security updates and procedures by our IT team have ensured that our customer's data is secure and inaccessible from any unrecognised third parties.

Thinksmart have been working through our own activities with a leading consultant from [Forfusion](#) and we now have a detailed roadmap. The areas are as follows:-

- Building our Information Asset Register*
- Reviewing the status of our current Risk Register in relation to the information we process on your behalf.*
- Considering the third parties that we liaise with to deliver our product*
- Evaluating and confirming the legal basis by which we process the information in our systems.*
- Drafting our privacy notices and reviewing our other policies and procedures.*

*We have determined that **we are a Data Processor** under the definition as described by GDPR and as such we have an obligation to you as our customer which we will be detailing in a forthcoming Data Processing Agreement between us and furthermore, as the owner of the business relationship with your own customers we have further determined that **you are the Data Controller**.*

We understand that being a Data Controller places certain obligations with you as the business owner and your customers, such as, obtaining appropriate Consent from your client base and recording that in a way that can be evidenced in the future should the client request it. There are other considerations too around data retention and how you keep information relating to your clients private and secure, not just in our product. This is not something we can advise on and any questions outside of our product will need to be directed to a GDPR consultant or expert.

One question we are being asked quite frequently is where your data is stored. In answer to this, your data is stored within our software via a cloud based server. This server is hosted in the UK and not outside of the EEA.

I'd also like to inform you all of some of the features that have been released and also which ones are due over the next week.

- Passwords now must be 8 characters long, contain upper case and lower case, a number and a special character (released)*

- A forgotten password feature (released)
- An opt out link for all marketing emails (released)
- Privacy policy added to the OCR (due within a week)
- Opt in or opt out tick boxes within the OCR (due within a week)
- Bulk deletion feature for inactive data (due within a week)

At Thinksmart we understand that taking care of the stresses of this to allow you to focus on what you do best is our priority. In the coming weeks we will be scheduling a webex seminar to provide you with the answers you need to fulfil the obligations of a Data Controller with your clients. Due to the already busy schedules of our current GDPR consultants, we are still in the process of organising a date for this. In advance of that we would like to hear from you and understand what questions and areas you'd like the Webex to focus on. We will not be able to respond to the questions but will be noting them all down for our consultant that will be conducting the webex seminar. All questions will need to be sent to info@thinksmartsoftware.co.uk

How may Sammy's dance use your information

- Personal Information such as Name, DOB and Address – This information can be accessed by all teaching staff and is used to register all attendees to sessions and to allow the teacher to contact a guardian in an emergency.
- Medical Information – This can be accessed by all teaching staff for the use of emergencies, if a paramedic or first aider is called they will need to be given this information.
- Registration – Students will use a simple registration form to sign up to classes, once the information has been recorded on our database, sammys dance will then destroy that registration form.
- Exam Results – This can be accessed by all teaching staff, and can be used to assess students development. Parents and the public can view school exam achievements on the school website but no names will be listed.
- Photos – If you **have** signed up to allow photography/videography of your student this may be used on our School website/Facebook Page and Instagram Account. Student images will never be used outside of these associates nor will a students name or age be advertised with images. Some images may also be used for advertising purposes such as school leaflets, banners and posters. Students will not be named with these images. If you **have not** signed up to photography/videography then these students will not be photographed.
- Students and guardians have the choice to change information at any time please send this to us in a sealed envelope, which can be destroyed once recorded on the database.