

Data Protection and Use of Student & Applicant's Data

- Adult student is deemed to be 18 years of age.
- Youth student is deemed to be under 18 years of age
- Applicants may be students who have applied directly, a parent legal guardian applying and booking on behalf of a youth student or a third party applying and booking on behalf of an adult student.

DATA PROTECTION ACT 1998 AND GENERAL DATA PROTECTION REGULATION

1 The Data Protection Act 1998 (DPA) regulates the processing of personal data in any format by 'The Actor's Edge Online Series', including both digital and hard copy personal data and all other formats. 'Personal data' is any information relating to a living individual, and 'processing' is any activity carried out involving personal data, including holding and storing that data. On 25th May 2018 the DPA will be superseded in the UK by the General Data Protection Regulation (GDPR), which provides individuals with enhanced rights, and imposes increased responsibilities on organisations processing personal data. This statement applies under both the DPA and GDPR.

2 This statement establishes TAEOS (The Actor's Edge Online Series) procedures governing the collection and release of student and applicant's data, is referred to in course terms and conditions at the time of booking and displayed on the TAEOS website. It includes information about how member data is used, and where it is supplied to other external parties.

3 TAEOS is the data controller for all personal data that it holds and processes, except where it is done in the capacity of a data processor on behalf of another data controller.

Contact Details

61 Bridge Street, Kington, Herefordshire, United Kingdom, HR5 3DJ

4 TAEOS Protection Officer is:

Georgia Thompson actorsedgeonline@gmail.com

NOTIFICATION TO APPLICANTS AND REGISTERED STUDENTS

5 TAEOS may obtain, hold and process the personal data of student members including personal details, family and social circumstances, education and training records and financial details. It may obtain, hold and process the sensitive personal data (the term used by the DPA) and special category data (the term used by GDPR) of student's physical or mental health in relation to their studies. The following information is not requested or held by the centre : racial or ethnic origin, religious or philosophical beliefs or biometric data.

6 Personal data and sensitive personal data/special category data held by TAEOS relating to students is obtained directly from the student or applicant at the time of booking or in some cases from a third party organisation involved in booking services provided by TAEOS, that have obtained the information in the first instance, for example social workers who apply on behalf of their client. The Data Protection Act gives special protection to sensitive personal data.

The only information that we retain of a sensitive and personal nature is medical and SEN information which our teaching staff require to support and teach students effectively. Sensitive personal data is not shared with other students due to the nature of the course's structure nor additional tutors, unless it is deemed crucial to the safety and success of a secondary tutor's ability to teach effectively. In these instances staff will obtain specific consent to inform other tutors of this sensitive personal data prior, so that the student can make a decision whether or not to still proceed with a course/class in the event that an additional tutor or cover was required. In the event of the student being a minor, parental consent will be sought.

7 TAEOS holds the personal data and sensitive personal data/special category data of its students in order to implement and manage all services and processes relating to students, including student recruitment, admission, registration, teaching and learning, examination, certification and graduation (if relevant) and other services such as student support and careers. Only information required for these purposes is obtained and processed, and without it TAEOS may not be able to provide its services. Information is passed between various sections of TAEOS for operational reasons as is necessary and proportionate for intended purposes.

8 Student personal data is collected and processed by TAEOS as it is necessary for the performance of the contract under which TAEOS provides services to students. Some processing activities may also be carried out under a legal obligation (for example, disclosing personal data to external parties under statutory powers), where it is necessary to protect the vital interests of the student or another party (for example, disclosures to external parties to ensure the safety and wellbeing of individuals), where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority (for example, collecting or disclosing information in order to meet regulatory or statutory requirements), or where it is necessary for legitimate interests pursued by TAEOS or a third party (the legitimate interests will relate to the efficient, lawful and proportionate delivery of services and will not be to the detriment of the interests or rights of individuals). Where any of these legal bases do not apply, the consent of an individual to process their personal data will be sought.

9 Where student's sensitive personal data/special category data is collected and processed by TAEOS this will be on the legal basis of explicit consent of the student, employment or social security/protection requirements, protecting the vital interests of the student or another party, the exercise or defence of a legal claim, reasons of substantial public interest, purposes of medical or health care, or where the information has

been made public by the student. Any processing will be proportionate and relate to the provision of services by TAEOS. When this data is used for monitoring and reporting purposes it will be anonymised if possible.

10 TAEOS may disclose student personal data and sensitive personal data/special category data to external agencies to which it has obligations. It may also disclose information to Police or security agencies and regulatory authorities. If students have unpaid debts at the end of their course then TAEOS may, at its discretion, pass this information to debt collecting agencies in order to pursue the debt.

11 TAEOS also uses student member personal data as follows:

- a) TAEOS may contact student declaring a disability to confidentially discuss available support.
- b) Provide progress reports to financial sponsors of students (except relatives).
- c) Provide references to education institutions and employers, usually with the additional consent of the student or at the student's request.
- d) Provide contact details to casting agents, only with the additional full consent of student, with regards to related employment.
- e) Disclose information about students and course graduates, for the purpose of promoting TAEOS but only with the additional consent of the student or graduate if they are personally identified.
- f) Disclosing information to external parties for safeguarding and duty of care purposes, for example to medical practitioners and law enforcement agencies.
- g) Produce certificates for students where relevant.
- h) Graduates of courses may be contacted after graduation by TAEOS to offer ongoing support with career plans, including coaching and job opportunities.

12 On graduating, all students automatically become members of TAEOS Alumni Association. They receive the opportunity to remain in touch with fellow graduates and to be kept up to date on TAEOS news, events, products, services and opportunities and to further support TAEOS if they wish to do so. If students do not wish to receive these communications you must notify Georgia Thompson, this can be done at any time after you graduate.

13 A basic academic record for individual student members will be kept permanently by TAEOS. More detailed records regarding students (other than basic contact details and academic records) will be destroyed/deleted 6 months after the date a student completes a course or is withdrawn from a course.

INDIVIDUAL RIGHTS

14 Individuals whose personal data and sensitive personal data/special category data is held by TAEOS have the following rights regarding their data:

- a) The right to request access to their personal data held by TAEOS.
- b) The right to have inaccurate or incomplete personal data rectified.
- c) The right to erasure of personal data – this will only apply where there is no legitimate reason for TAEOS to continue to process the personal data. There will usually be a requirement for TAEOS to keep a basic student record indefinitely.
- d) The right to restrict the processing of personal data – individuals have the right to block the processing of their personal data by TAEOS in specific situations.
- e) The right to data portability – students have the right to request provision of some elements of their information (for example academic progress details) in digital form in order to provide it to other organisations.
- f) The right to object – students can object to the processing of their personal data by the TAEOS in certain circumstances, including the sending and receipt of direct marketing material.
- g) All requests to exercise any of these rights should be made to the TAEOS Data Protection Officer.

15 Where the processing of personal data or sensitive personal data/special category data is based on the consent of the student, they have the right to withdraw their consent at any time by contacting the department or service who obtained that consent or TAEOS' Data Protection Officer Georgia Thompson.

16 If a student is unhappy with TAEOS handling of their personal data, or believes that the requirements of the DPA or GDPR may not be fully complied with, they should contact TAEOS Data Protection Officer in the first instance. TAEOS formal complaint procedure can be invoked if appropriate, and they also have the right to submit a complaint to the Information Commissioner's Office; further details can be found at www.ico.org.uk.

STUDENT USE OF PERSONAL DATA

17 Students of TAEOS are permitted to process personal data only for use in connection with their course studies, research or production purposes. Whilst this is unlikely with most courses it may be relevant to some. They may do this only with the express prior permission of their supervising member of staff as part of a course project, and only in accordance with any guidance or Code of Practice issued by TAEOS and in force at that time. This applies whether or not those activities are carried out on equipment owned or software

platforms offering TAEOS courses. This means that the personal data collected must be: fairly and lawfully obtained and processed; used only for specified and legitimate purposes; accurate and up-to-date; held securely; kept to the minimum possible and anonymised or pseudonymised where possible; not published, put online or taken outside of the European Economic Area without the consent of the individual concerned; and be deleted or destroyed when it is no longer relevant to retain it. The individuals about whom data are held are entitled to inspect the data unless it is held only for research or production purposes and will not be released in such a way as to identify the individuals concerned.

18 Students needing to process personal data for academic, research or production purposes must make themselves aware of the general requirements of the Data Protection Act 1998 and the General Data Protection Regulation, and in particular must abide by the data protection principles set out in Schedules I, II and III of the DPA, and Articles 5, 6 and 9 of GDPR. Students can do this by obtaining a copy of the TAEOS current guidance on data protection, and further relevant information from their supervising member of staff.

19 Students who fail to comply with any guidance or Code of Practice in force may be held personally liable for any resulting breaches of the Data Protection Act 1998 or General Data Protection Regulation.

Data Protection and Use of Youth Students, Booking Applicants & Parent/Legal Guardian's Data

PRIVACY NOTICE – HOW WE USE YOUTH STUDENT, FINANCIAL SPONSORS, BOOKING APPLICANTS & PARENT/LEGAL GUARDIAN DATA

21 TAEOS holds the legal right to collect and use personal data relating to youth students, their financial sponsors if relevant and family members who have made bookings on their behalf. To take part in a course under the age of 18 a youth student must have permission from a parent/ legal guardian who must supply their name and contact details at the time of booking. We collect and use personal data in order to meet legal requirements and legitimate interests set out in the GDPR and UK law.

22. The categories of youth student information that we collect, hold and share include:

- a) Personal information (such as name and address)
- b) Online attendance information (such as courses taken)
- c) SEN information (Special Educational Needs)
- d) Relevant medical information
- e) Individual Assessment Data

23. Why we collect and use this information

We may collect and hold personal information relating to our youth students. We use the youth student data:

- a) To support youth student learning

- b) To monitor and report on youth student progress where relevant
- c) To provide appropriate pastoral care
- d) To assess the quality of our services
- e) To comply with the law regarding data sharing
- f) To safeguard youth students
- g) To contact financial sponsors and any family members who make bookings on their behalf, in the best interests of the student's learning.

24. The categories of financial sponsors, parental/legal guardian information that we collect, hold and share include:

- a) Personal information (such as name and address)
- b) Contact numbers

25. Storing youth student and parent's data

Personal data relating to youth student, their financial sponsor if relevant and family members who have made a booking on their behalf and or granted permissions to take part in a course are stored in line with TAEOS GDPR Data Protection Policy.

In accordance with the GDPR, TAEOS does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task the data was collected for originally.

26. Who we share youth student and parent information with

- The Department for Education (DfE) if requested directly
- Child protective services
- Local Authority if requested
- The Police in the event of an emergency or if requested.

27. Why we share youth student, parent/legal guardian information

We do not share information about our students with anyone without consent, unless UK law and our policies allow us to do so.

28. Requesting access to you or your child's personal data

Under data protection legislation, parents and youth students have the right to request access to information about them that we hold. To make a request for your personal information please contact our Data Protection Officer Georgia Thompson actorsedgeonline@gmail.com

You also have the right to:

- a) object to processing of personal data that is likely to cause, or is causing, damage or distress
- b) prevent processing for the purpose of direct marketing
- c) object to decisions being taken by automated means
- d) in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

30. Contact

If you would like to discuss anything in this privacy notice, please contact Georgia Thompson actorsedgeonline@gmail.com

31. DATA PROTECTION AND USE OF DATA THROUGH OUR WEBSITES

This policy covers the booking websites operated by TAEOS and associated partners.

We comply with data protection legislation such as the Data Protection Act 1998. This regulates the processing of personal data relating to you and grants you various rights in respect of your personal data. We'd like to reassure you that any personal data you give us will be treated in complete confidence.

The aim of this statement is to tell you how we use any personal data we collect about you through our booking websites. Please read it carefully before you proceed.

32. WHAT INFORMATION DO WE COLLECT?

You do not have to give us any personal data in order to use most of our websites.

However, by registering with us, you agree that we may process the data detailed below for the purposes outlined in our Privacy Policy.

33. Adult student, youth student, booking applicants and parent/legal guardian's data

If you wish to enrol a student with TAEOS, we will collect the following personal data where relevant to age:

- a) parent or guardian's name, student's name, contact and address details; relationship to the student (if student is under the age of 18), name, age and date of birth of student and any medical conditions or learning difficulties that the student has they may affect their online learning. If the student is over 16 years of age, please ensure that you additionally have their permission to share these details with us if you are applying on their behalf.
- b) Online payments made to TAEOS are processed securely by PayPal or Lloyds Bank and the information you provide is communicated in a strongly-encrypted format between PayPal or Lloyds Bank and your bank or credit card company. TAEOS does not directly collect, process or store financial information when you pay for our services online.

34. Tutoring Staff

If you wish to apply to become a tutor with TAEOS, we will collect details such as :

- a) Your name, contact details, time at your last address, whether you are car owner and have a full clean driving license, date of birth and training qualifications. We will also collect details of any relevant criminal convictions and will need to see a copy of your DBS certificate before offering you any position. We will only retain your DBS certificate reference number and date of issue.

- b) If you wish to apply to become a tutor through our booking websites, we will collect your name, contact details and information contained in your CV in order to make this information available to the relevant Principals for their own recruitment purposes. If you provide details of a reference, it is your responsibility to make sure that the person is aware that you have forwarded his/her details for these purposes. If you are taken on by a Principal, we will also keep details of your DBS certificate reference number and date of issue and any training qualifications.

35. Other individuals

If you wish to contact us for other purposes, we ask for your contact details so we can respond to your queries.

If you contact us about private lessons, course information we will collect details of your name or applying parent and child's name, date of birth and the type of service requested.

36. Sensitive personal data

The Data Protection Act gives special protection to sensitive personal data. The only information that we retain of a sensitive and personal nature is medical and SEN (special educational needs) information which our staff require to support and teach student effectively. Sensitive personal data is not shared with third parties.

37. Automatically collected information

We may collect information on which pages of our websites you visit, IP addresses, the type of browser you use and the times you access our websites. However, this information is aggregated and is not used to identify you.

38. HOW WILL INFORMATION ABOUT YOU BE USED AND SHARED?

The information we collect allows us to:

- a) locate and put you in touch with a service we provide
- b) process your request to become a tutor if relevant
- c) provide tutoring services and personal coaching in performing arts.
- d) administer our booking websites and provide customer services
- e) meet legal, regulatory and compliance requirements including the administration of TAEOS statutory obligations relating to children
- f) gather management information for research purposes and to form statistical and trend analysis
- g) communicate with you
- h) send you surveys and competitions
- i) improve our booking websites and the products and services we offer to you and to provide you with online personalised services and targeted advertising including through the use of cookies when you visit our booking websites

- j) provide you with information about our products and services which may be of interest to you from time to time.
- k) We may employ the services of a third party to help us in certain areas, such as website hosting, support and maintenance, and child protection issues. In some cases, the third party may receive your information. However, at all times, we will control and be responsible for the use of your information.
- l) We may also use aggregated information so we can administer and improve our booking websites, analyse trends and gather broad demographic information. We may pass this information to third parties.
- j) We may also disclose your personal data when we believe this is required by law, to enforce or comply our terms and conditions or to protect the rights, property, safety of TAEOS, our customers or others.

39. TRANSFER OF YOUR INFORMATION OUTSIDE THE EU

Some of the recipients of your personal data (including sensitive personal data) may be located in countries outside of the European Economic Area such as the US but we remain responsible for making sure that your personal data is given adequate protection and held securely. By submitting your personal data to our booking websites, you agree that such transfers may take place.

40. MARKETING COMMUNICATIONS

From time to time TAEOS and its teaching staff may wish to provide you with information about the other products and services (including by online targeted advertising, post, email and text) which may be of interest to you. They may also ask you to supply a testimonial as part of their tutor appraisals. If testimonials are published online or in marketing materials only a first initial, last name, age and country of residence will be made public, with no further identifying features published.

If you do not wish to receive such information, please contact Georgia Thompson at actorsedgeonline.com to unsubscribe at any time.

41. LINKS

Our websites may contain links to other third party websites and teaching platforms over which we have no control. We are not responsible for privacy policies or practices of any websites to which you choose to link to from our sites. We encourage you to review the privacy policies of those other web sites so you can understand how they collect, use and share your information.

42. SECURITY

We have implemented reasonable technical and organisational measures designed to secure your personal data from accidental loss and from unauthorised access, use, alteration or disclosure. However, the Internet is an open system and we cannot guarantee that unauthorised third parties will never be able to defeat those measures or use your personal data for improper purposes.

43. SALE OF THE BUSINESS

In the event that the business is sold or integrated with another business, your details will be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

44. HOW TO CONTACT US

You are entitled to see the information held about you. You may review, correct, update or change your

personal data at any time.

If you have any other questions about this policy or your personal data, please contact Georgia Thompson actorsedgeonline.com

45. CHANGES TO OUR PRIVACY POLICY

If our privacy policy changes in any way, we will place an updated version on this page. Regularly reviewing this page ensures that you are always aware of what information we collect, how we use it and under what circumstances, if any, we will share it with other parties.

DATA PROTECTION- ADDITIONAL CONSIDERATIONS

46. DATA PROTECTION FOR CUSTOMERS WHO PAY VIA INTERNET BANKING, BACS OR PAYPAL.

Online payments made to TAEOS are processed securely by PayPal or Lloyds Bank and the information you provide is communicated in a strongly-encrypted format between PayPal or Lloyds and your bank or credit card company. TAEOS does not directly collect, process or store financial information when you pay for our services online.

47. DATA PROTECTION FOR ADULTS TAKING ACTING FOR CAMERA COURSES/ACTING TECHNIQUE COURSES.

Students will be asked if they wish to send in optional video footage for tutor feedback as part of some assignment submissions for specific units in some courses. The unit assignments can be submitted in other ways and do not have to be completed using video footage. If a student does decide to submit footage via video then tutors will not forward this footage to any third party or keep this data for any other purpose than the course. Footage will be deleted once the course is completed. Likewise any audio file or text assignments that a student decides to submit will be used for course purposes only and will not be forwarded to any third party and deleted once the course is completed. The option to consent to submitting video files will be given to the student at the time of booking. Booking applicants cannot give permissions to consent to optional filming on someone else's behalf, in such situations then consent will be sought directly with the student once the course commences direct with the tutor. Parents or legal guardians making decisions for young students can do so at the time of booking, albeit once the course starts a young person can decide to rescind this permission if they so choose, by directly informing their tutor in writing.

Tutors are not permitted to make live recordings nor film students at any time, other than to receive footage that a student has themselves submitted..

Filming or taking photographs of online course materials by students with their own equipment is not permitted. Nor is the uploading of subsequent photographs, visual and audio recordings to social media or the internet which have been taken of online course resources including tutors feedback or image. Youth student members who fail to comply with this guidance may be held personally liable for any resulting breaches of the Data Protection Act 1998 or General Data Protection Regulation.

48. SOFTWARE AND THIRD PARTY WEBSITES

TAEOS are not responsible for how any software platform or third party website stores a student's name or contact details, or assignments submitted to the course and any personal data image or likeness therein during a course but will make sure that after the course using their access data that any information stored is deleted once the course is fully complete, usually within 2 months of the completion date. Please see software platforms and third party websites for their own specific privacy and data protection policies where relevant.

49. DATA PROTECTION STAFF

We do not release private phone numbers, addresses or contact details of our staff to any of our students or parents of youth student members. Contact work based email and work based contact numbers will be provided if requested.

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TAEOS