



DATA PRIVACY STATEMENT

INTRODUCTION – ESPA APPROACH TO DATA PRIVACY

This Privacy Notice explains when and why ESPA collects personal information, how it is used, the condition under which it may be disclosed to others and how it is kept secure.

WHAT PERSONAL INFORMATION DO WE COLLECT AND WHY?

Primarily we collect personal information only to record student details and to comply with relevant regulations and laws including GDPR.

The consent for the lawful basis for controlling and your personal information is given when you complete the student registration form.

The reasons and types of data we collect is summarised below along with the primary data processors

Why we Collect Information	What information we Collect	How information is processed	Disclosure and\or Consent	Systems\SubProcessors Used
To maintain a database of students	Basic information verifying identity of student	Data recorded in Registration Form and held on Google Drive. Data recorded on Parent portal.	Consent\Waiver fields on Registration Form	Google Forms Sixtech Parent Portal
To maintain a database of parents\legal guardians	Basic Information verifying identity of legal guardian and contact details	Data recorded in Registration Form and held on Google Drive. Data recorded on Parent portal.	Consent\Waiver fields on Registration Form	Google Forms Sixtech Parent Portal
To record any specific medical notes in case of incidents	Allergies\ Illnesses\ Medical Conditions	Data recorded in Registration Form and held on Google Drive	Consent\Waiver fields on Registration Form	Google Forms Sixtech Parent Portal
To provide copies of school Shows	Video \ Still Photograph of students	Images recorded at shows, rehearsals and in class.	Permissions and GDPR fields on Registration Form	Google Email Whatsapp YouTube Facebook Instagram
To distribute information and communicate with parents\legal guardians	Basic information verifying identity of student and legal guardian\parent	Contact details used to send emails and messages.	Consent\Waiver fields on Registration Form	Whatsapp Google Email Sixtech Parent Portal

WHAT ARE YOUR RIGHTS AROUND DATA?

You have a number of rights over your personal information by contacting us using the contact details in the Data Privacy Notice. We will respond within one month in line with data protection regulations.

RIGHT TO BE INFORMED

You have the right to be informed when data is collected and for what purposes. This is contained in the registration form where we request data from you so it is implicit when you submit the form to us that we are collecting that information.

RIGHT TO ACCESS INFORMATION WE HOLD FOR YOU

You have the right to access the information we hold for you by providing a data access request to elevationdance@gmail.com (Laragh and Aughrim classes) or elevationallstars@gmail.com (Blessington classes)

You will have access to this information via our parents portal.

RIGHT TO BE INFORMED OF MATERIAL BREACHES

Should any breaches occur we will inform you without undue delay and will immediately contact the Data Protection Commission of Ireland.

RIGHT TO RECTIFICATION

You can ask us to correct and update personal information we hold about you. It is important we have your up to date personal information such as contact details. To make sure your information is up to date we will review your data monthly. You can also update your information on the parents portal.

RIGHT TO ERASURE

When you leave ESPA we will retain your data for a period of up to 12 months, this information will be kept for accountancy and analysis purposes. However you can have your data deleted if it is incorrect, no longer needed or has been processed unfairly.

RIGHT TO DATA PORTABILITY

You can ask for a copy of all personal data that you gave us (including your through your interactions with us on email and whatsapp) and which we hold in machine readable format.

RIGHT TO RESTRICT PROCESSING OR OBJECT TO PROCESSING

You can object to any unfair and unlawful collection or use of your personal data. You can withdraw consent and object to, for example use of images in marketing or advertising for ESPA.

SHARING OF YOUR PERSONAL DATA

Your personal data will be treated as strictly confidential at all times.

WHAT IS THE LAWFUL BASIS FOR PROCESSING YOUR DATA?

GDPR regulations stipulate a number of reasons for processing personal data, those that are applicable to ESPA are:

Consent – ESPA will always obtain and retain evidence of explicit consent from a data subject to collect and process their data. In respect to children below the age of 16, parental consent will be obtained. (as per articles 7 and 8)

Legitimate Interest – The processing of personal data is in the legitimate interests of ESPA. For example, sending parents\legal guardians updates on classes and events, keeping a database of all students personal data for reference, class assignments, team placements and competition entries.

GDPR REGULATIONS APPLICABLE TO ESPA

Extracted from GDPR – Article 4

Personal Data means:

any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person – Article 4(1)

GDPR PRINCIPLES

The GDPR is based on a number of fundamental principles for processing personal data; these are set out in Article 5 and summarised below

Extracted from GDPR – Article 5

1. *Personal data shall be:*

*processed lawfully, fairly and in a transparent manner
collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; ('purpose limitation')
adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
accurate and, where necessary, kept up to date; ('accuracy');
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; ('storage limitation');
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 ('integrity and confidentiality').*

DATA WE COLLECT

Data	Type	Gmail	Google Forms	SixTech	Whatsapp	YouTube	Facebook	Instagram
Email Address	Personal	x	x	x				
Parent\Guardian First Name	Personal	x	x	x	x			
Parent\Guardian Surname	Personal	x	x	x	x			
Student First Name	Personal		x	x				
Student Surname	Personal		x	x				
Student Date of Birth	Personal		x	x				
Student Age	Personal			x				
Home Address	Personal		x	x				
Mobile Phone Number	Personal		x	x	x			
Allergies\Illnesses\Medical Conditions	Special Category		x	x				
Injury Waiver	Consent		x					
Release Waiver	Consent		x					
Parent\Legal Guardian Signature	Personal		x					
Fair usage of Images	Consent		x					
Student images (photographs, video)	Special Category					x	x	x
GDPR regulations	Consent		x					
Rules and Agreement	Consent		x					