



Zest Dance – Data Protection & Privacy Policy 2025

Purpose and Statement:

Zest Dance is committed to protecting personal data and complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018). We process personal data lawfully, fairly and transparently, keep it secure, and only for as long as necessary.

This policy explains what we collect, why we collect it, how we use and share it, how long we keep it, and the rights of individuals.

Our lawful bases:

Depending on the activity, we rely on one or more of the following UK GDPR Article 6 bases: Contract (6(1)(b)), Legal obligation (6(1)(c)), and Legitimate interests (6(1)(f)). For some limited activities we rely on Consent (6(1)(a)).

For special category data (e.g., health, ethnicity), we rely on Article 9 conditions such as explicit consent (9(2)(a)) and, where applicable, employment/social security/social protection (9(2)(b)), health (9(2)(h)), or substantial public interest with a DPA 2018 Schedule 1 condition (e.g., equality of opportunity or treatment) supported by an Appropriate Policy Document.

For criminal offence data (e.g., DBS information), we comply with Article 10 UK GDPR and a DPA 2018 Schedule 1 condition, and keep an Appropriate Policy Document. Consent alone is not sufficient for this category.

Who we are and how to contact us:

Data Controller: Zest Dance, Zest Dance New Milton & Zest Dance Evesham

Main Data Protection Officer (DPO): Principal, Frankie Young – frankie@zest-dance.co.uk

You can contact us to exercise your rights or ask questions about this policy.

What we collect and why:

Participants & Parents/Carers

We collect identification and contact details, date of birth, class and payment records, exam entries/results, and, where relevant, health/disability information to safeguard participants and deliver appropriate tuition. Our primary bases are Contract, Legitimate Interests, and Legal obligation (e.g., safeguarding/health & safety). Special category data (e.g., medical) is processed under Article 9 (typically 9(2)(a) explicit consent and/or 9(2)(h) health). Where we collect equality data (e.g., ethnicity) for statistics or equalities reporting, we use an appropriate Schedule 1 condition and policy document, or we aggregate/anonymise so it is no longer personal data.

W: www.zest-dance.co.uk **E:** info@zest-dance.co.uk



Staff, Freelancers & Volunteers

We collect data necessary for recruitment, vetting and engagement (e.g., right to work, qualifications, references, payroll/tax/NI, bank details), performance/attendance, and safeguarding. Our bases include Legal obligation, Contract, and Legitimate interests. For DBS/criminal-offence data we comply with Article 10 and DPA 2018 Schedule 1 and retain an Appropriate Policy Document.

Where the data comes from:

Directly from you (online forms via Class Manager, emails/web forms), from parents/guardians for children, and, for staff/volunteers, from application/CV and vetting.

Sharing data (controllers & processors):

We do not sell personal data. We share only when necessary and lawful, under contract and with appropriate safeguards:

- Administration and payments systems including but not limited to; Class Manager, Dance Business Solutions, Mailerlite, Trello, GoCardless, Stripe.
- Exam boards (e.g., IDTA) for entries/results.
- Local authorities for child performance licensing/safeguarding where legally required.

Marketing, cookies and PECR:

Email newsletters and social-media direct messages used for marketing comply with the Privacy and Electronic Communications Regulations (PECR) (consent or soft opt-in, as applicable). Our website uses cookies in line with ICO guidance; non-essential cookies require consent. See our website cookie notice for details.

Security:

We use access controls, encryption, and secure storage (locked cabinets for paper; encrypted devices and cloud for digital). We limit access to authorised staff/contractors and train them in data protection.

Retention:

We keep data only as long as necessary for the purpose collected, then securely delete or anonymise.

- Student records/registers: normally 3 years after last attendance (unless needed longer for claims).
- Financial records: 6 years (statutory).
- Accident/First Aid records: for children, up to 21 years from the incident (3 years after the child turns 18); for adults typically 3 years.
- Safeguarding records: minimum 6 years, and longer where appropriate on a case-by-case basis.
- Unsuccessful job applicants: 6 months after campaign unless agreed with applicant otherwise.

Retention schedules are reviewed periodically against sector guidance.

Your rights:

Under UK GDPR you have rights to: be informed, access, rectification, erasure, restriction, portability, object, and rights in relation to automated decision-making/profiling. We respond within one month (extendable by two further months for complex requests; we will notify you if so). Some rights may be limited where we have overriding legal obligations (e.g., safeguarding, financial records).

W: www.zest-dance.co.uk **E:** info@zest-dance.co.uk



How to exercise your rights: email the DPO (above), and we may need to verify identity.

Photos & videos:

We use images/footage from classes, shows and events for educational and promotional purposes (website, print, social). We will not publish identifying details without consent. You may opt out at any time; we will take reasonable steps to honour preferences, noting we cannot control third-party recordings at public events, e.g. summer fetes etc.

Automated decision-making:

We do not make decisions solely by automated means. Limited, proportionate profiling may occur (e.g., grouping students by age/level; health flags for safety) under Legitimate interests/Contract and, if special category data is involved, the relevant Article 9 condition.

Data breaches:

We record all personal-data breaches. Where a breach is likely to risk individuals' rights and freedoms, we notify the Information Commissioner's Office (ICO) within 72 hours and, when required, notify affected individuals without undue delay.

Complaints:

If you are concerned about how we handle your data, contact the DPO first. You also have the right to complain to the Information Commissioner's Office (ICO): 0303 123 1113 / ico.org.uk.

Training & governance:

All staff, freelancers and volunteers receive data protection training at induction and through supervision. We maintain records of processing, carry out DPIAs for higher-risk processing, and (where required) hold Appropriate Policy Documents for special category/criminal-offence data.

Review:

This policy is reviewed annually or sooner if the law or our processing changes.

