



Data Protection and Privacy Policy

1. Introduction

Sharpe Academy of Theatre Arts Limited (“Sharpe Academy”, “we”, “us”, “our”) is committed to protecting the privacy and personal data of our students, parents, clients and customers.

This policy explains:

- What personal data we collect
- How and why we use it
- How we keep it safe
- Your rights in relation to your data

We aim to keep this information clear and transparent, while ensuring full compliance with UK data protection law, including the UK GDPR and Data Protection Act 2018.

2. Who this policy applies to

This policy applies to:

- Parents and guardians of part-time students
- Part-time students (typically aged under 18)
- Full-time (college) students
- Applicants to our courses
- Clients of Agent Sharpe
- Customers of Sharpe Dancewear
- Visitors to our premises

3. About Sharpe Academy

Sharpe Academy operates across three main areas:

- **Sharpe Academy** – Part-time classes, full-time training, productions and holiday schools
- **Agent Sharpe** – International agency representing professional performers and graduates
- **Sharpe Dancewear** – Online store supplying dancewear, uniform and related items

4. What data we collect

We only collect information that is necessary for the safe and effective running of our services. This may include the following types of personal data:

4.1 Student and applicant data

- Name, date of birth and contact details
- Parent/guardian details (for part-time students)
- Address and emergency contact information
- Medical or health information (where relevant)
- Attendance records
- Examination entries and results
- Audition and application information
- Progress, pastoral or welfare notes (where appropriate)

4.2 **Agency client data** (Agent Sharpe)

- Contact details
- CVs, headshots and performance information
- Casting and representation information

4.3 **Customer data** (Sharpe Dancewear)

- Name and contact details
- Delivery and billing addresses
- Order history and payment information

4.4 **CCTV data**

- Video recordings of individuals on our premises for security purposes
(See separate CCTV policy for full details)

5. **How we collect your data**

We collect personal data in a number of ways, including:

- Online enrolment and application forms
- Emails and direct communication
- In-person registration or meetings
- Purchases via our website
- CCTV systems on our premises

For part-time students, data is usually provided by a parent or guardian.

For full-time students, data is typically provided directly by the student.

6. **How and why we use your data**

We use personal data to run our academy safely, effectively and professionally.

Core purposes

- Managing enrolment and applications
- Delivering classes, training and productions
- Communicating with students and parents
- Safeguarding and student welfare
- Managing attendance and progress
- Entering students for examinations
- Providing agency representation (where applicable)
- Processing orders and payments
- Maintaining the safety and security of our premises

7. **Lawful basis for processing**

Under UK GDPR, we must have a lawful basis for using your data. The main bases we rely on are:

Contract

- To provide classes, training, agency services or products
- For part-time students, this is with the parent/guardian
- For full-time students, this is with the student

Legal obligation

- Safeguarding requirements
- Licensing (e.g. Body of Persons licences)
- Health and safety obligations

Legitimate interests

- Running and improving our services
- Ensuring the safety and security of students, staff and premises (including CCTV)
- Day-to-day administration
- Consent
- Marketing communications
- Use of images, videos and media (covered in a separate consent form)

Where we rely on your consent, you can withdraw it at any time. This will not affect any use of your data before you withdrew consent, or any use that we are required to continue for legal or contractual reasons.

8. Special category data

We may collect limited sensitive data (such as medical information) where necessary to:

- Support student health and wellbeing
- Ensure safe participation in training

This data is:

- Only collected when necessary
- Stored securely
- Accessed only by authorised staff

9. Sharing your information

We do not sell or share personal data unnecessarily.

- We may share data where required for legitimate purposes, including:
 - Examination boards (for exam entries)
 - Local authorities (e.g. performance licensing)
 - Casting platforms and industry professionals (Agent Sharpe only)
 - Payment processors and e-commerce platforms
 - IT and cloud service providers

All third parties are required to handle data securely and in line with data protection law.

10. How long we keep your data

We only keep personal data for as long as necessary.

Typical retention periods include:

- Student records: up to 6 years after leaving
- CCTV recordings: 30 days (unless required for investigation)
- Financial records: as required by law

Full details are set out in our Data Retention Policy.

11. How we keep your data secure

We take appropriate technical and organisational measures to protect personal data, including:

- Secure cloud storage systems
- Password protection and access controls
- Multi-factor authentication where available
- Secure storage of paper records
- Limiting access to authorised staff only

Where printed materials are required (such as class registers), we apply data minimisation principles to ensure that only the minimum necessary personal information is included, and that sensitive information is not unnecessarily displayed.

Printed documents are stored securely when not in use and disposed of confidentially when no longer required.

12. International data transfers

Some of our systems (e.g. cloud providers) may store data outside the UK.

Where this happens, we ensure appropriate safeguards are in place, such as:

- UK-approved international data transfer agreements
- Providers with recognised data protection standards

13. Your data protection rights

Under UK data protection law, you have the right to:

- Request access to your personal data
- Request correction of inaccurate data
- Request deletion of your data (where appropriate)
- Object to or restrict certain types of processing
- Withdraw consent where applicable

Requests should be made in writing to the Academy.

14. CCTV

CCTV is used on our premises for safety and security.

- Cameras are positioned in public and communal areas only
- Recordings are retained for a limited period
- Access is restricted

Full details are provided in our CCTV Data Protection Impact Assessment.

15. Updates to this policy

This policy is reviewed regularly and may be updated to reflect changes in our practices or legal requirements.

16. Contact

If you have any questions about this policy or how your data is handled, please contact Sharpe Academy of Theatre Arts Limited by email at info@sharpeacademy.co.uk.