

Privacy Policy

Effective Date: 01 January 2022

1. Introduction

Platinum Academy of Performing Arts ("Platinum Academy", "we", "us" or "our") respects your privacy. When it comes to your personal information, we believe in transparency, not surprises. That's why we've set out here what personal information we collect, what we do with it and your choices and rights.

By using Platinum Academy of Performing Arts' services, you confirm you have agreed to our Terms and Conditions and read and understood this Privacy Policy and our <u>Cookie Policy</u>. If you have any comments or questions about this Privacy Policy, feel free to contact us at <u>admin@platinumacademy.co.uk</u>

2. How does this Privacy Policy apply?

This Privacy Policy describes what we do with personal information that we collect and use for our own purposes, such as your registration information and information about how you use and interact with our services.

We use cookies and similar technologies. Our <u>Cookie Policy</u> describes what we do in that regard.

3. Personal Information we collect

We collect various personal information. This includes the following:

- Information provided to create an application, specifically; applicant's first name and surname, applicant's date of birth, applicant's email address, applicant's home address, applicant's phone number and next of kin email address
- Emergency contact details
- Medical and health information
- Consents to photography/videography/medical treatment
- Headshot/photograph
- National insurance number
- Birth certificate
- Passport
- Attendance and punctuality information
- Assessment information
- CCTV footage is captured across our facilities to protect our staff, students, visitors and premises

- The emails and other communications that you send us or otherwise contribute, such as our customer support inquiries
- Information you share with us in connection with surveys, contests or promotions

4. How we collect personal information

We obtain personal information from various sources. We do this in three main ways:

- 1. You provide some of it directly (such as by applying with us online on our website).
- We record some of it automatically when you use our website (including technologies like cookies).
- 3. We receive it from third parties (when you make payments to us using a payment processor).

We've described this in more detail below.

a. Personal information you provide

When you use our services, we collect information from you in a number of ways. For instance, we ask you to provide applicant's first name and surname, applicant's date of birth, applicant's email address, applicant's home address, applicant's phone number and next of kin email address. We also maintain the emails and other communications that you send us or otherwise contribute, such as customer support inquiries. You might also provide us with information in other ways, including by responding to surveys, submitting a form on our website or participating in contests or similar promotions.

Sometimes we require you to provide us with information for contractual or legal reasons. We'll normally let you know when information is required, and the consequences of failing to provide it. If you do not provide personal information when requested, you may not be able to use our services if that information is necessary to provide you with the service or if we are legally required to collect it.

b. Personal information obtained from our website

When you use our website, we collect information about your activity and interaction with our site, such as your IP address(es), your device and browser type, the web page you visited before coming to our site, what sites pages on our sites you visit and for how long and identifiers associated with your devices.

Some of this information is collected automatically using cookies and similar technologies when you use our services. You can read more about our use of cookies in our <u>Cookie Policy</u>. Some of this information is similarly collected automatically through your browser or from your device.

c. Personal information obtained from other sources

If you use a Third Party service (such as MailChimp) to join our mailing list, the third party service may provide us with your personal information on your behalf.

If you make payments via card or cheque, we obtain limited information about your payment card from our payment processor, such as the last four digits, the country of issuance and expiration date.

5. How we use your personal information

We use the personal information we obtain about you to:

- **Provision of the Services.** Creating your application, provide our services, process payments and respond to your inquiries.
- Communicating with you. Communicate with you, including by sending you emails, text messages and service-related announcements.
- Surveys and contests. Administer surveys, contests and other promotions.
- Promotion. Promote our services and send you tailored marketing communications about services, offers, events, classes and promotions of Platinum Academy of Performing Arts and measure the success of those campaigns.
- Improving our services. Analyse and learn about how our website is accessed and
 used, evaluate and improve our services (including by developing our website and
 managing our communications) and monitor and measure the effectiveness of our
 website. We usually do this based on anonymous, pseudonymized or aggregated
 information which does not focus on you individually. For example, if we learn that
 most visitors on our website are attracted to a specific area, we might wish to expand
 on the information on that area.
- Security. Ensure the security and integrity of our services.
- Third party relationships. Manage our vendor and partner relationships.
- Enforcement. Enforce our Terms and Conditions and other legal terms and policies.
- Complying with law. Comply with applicable legal requirements and government regulations and industry standards, contracts and law enforcement requests.

We process your personal information for the above purposes when:

- Consent. You have consented to the use of your personal information in a particular way. When you consent, you can change your mind at any time.
- Performance of a contract. We need your personal information to provide you with services and products requested by you, or to respond to your inquiries. In other words, so we can perform our contract with you or take steps at your request before entering into one. For example, we need your telephone number if we have to contact you in an emergency.
- Legal obligation. We have a legal obligation to use your personal information, such as to comply with laws and other government regulations or to comply with a court order of binding law enforcement request.
- Legitimate interests. We have a legitimate interest in using your personal information. In particular, we have a legitimate interest in the following cases:
 - To operate the Platinum Academy of Performing Arts college and provide you with tailored services and communications to develop and promote our institution.

To provide and improve our services, including any personalised services – we
do this as it is necessary to pursue our legitimate interests of providing an
innovative and tailored offering to our customers on a sustained basis.

6. How we share your Personal Information

We share personal information in the following ways:

- Platinum Academy Staff. We share personal information with our staff when it is reasonably necessary or desirable, such as to help provide services to you or analyse and improve the services we or they provide.
- Service providers. We share personal information with our service providers that
 perform services on our behalf. For example, we may use third parties to help us with
 our mailing campaigns, advertisements, send marketing and other communications
 on our behalf.
- Process payments. We transmit your personal information via an encrypted connection to our payment processor.
- Following the law. We disclose your personal information if we determine that such
 disclosure is reasonably necessary to comply with the law. In particular, we may
 disclose your personal information in response to lawful requests by local authorities,
 such as applying for your child's performance licence and other law enforcement
 requirements.

7. Your rights and choices

Where applicable law requires (and subject to any relevant exceptions under law), you may have the right to access, update, change or delete personal information.

You can access, update, change or delete personal information by contacting us at admin@platinumacademy.co.uk to request the required changes. You can exercise your other rights (including terminating your contract in accordance with our Terms and Conditions) by contacting us by the same email address.

You can also elect not to receive marketing communications by unsubscribing by following the instructions within the communications or managing your preferences.

Please note that, for technical reasons, there is likely to be a delay in deleting your personal information from our systems when you ask us to delete it. We also will retain personal information in order to comply with the law, protect our and others' rights, resolve disputes or enforce our legal terms or policies, to the extent permitted under applicable law.

Our Cookie Policy explains how you can manage cookies and similar technologies.

8. How we protect your personal information

We maintain administrative, technical and physical safeguards that are intended to appropriately protect against accidental or unlawful destruction, accidental loss, unauthorised alteration, unauthorised disclosure or access, misuse and any other unlawful form of processing of the personal information in our possession. Our website is also SSL secure.

9. How we retain your personal information

We retain personal information regarding you or your use of our services for as long as your contract with us is active or for as long as needed to provide you with the services. We also retain personal information for as long as necessary to achieve the purposes described in this Privacy Policy, for example, to comply with our legal obligations, to protect us in the event of disputes and to enforce our agreements and to protect our and others' interests.

The precise periods for which we keep your personal information vary depending on the nature of the information and why we need it. Factors we consider in determining these periods include the minimum required retention period prescribed by law or recommended as best practice, the period during which a claim can be made with respect to an agreement or other matter, whether the personal information has been aggregated or pseudonymized, and other relevant criteria. For example, the period we keep your telephone number is connected to how long your contract with us is active, while the period for which we keep your enquiry email is based on how long has passed since the last submission in the thread.

Please note that in the course of providing services, we collect and maintain aggregated, anonymized or de-personalised information which we may retain indefinitely.

10. Updates to this Policy

We may update this Privacy Policy from time to time. When we make changes, we'll update the 'Effective Date' at the top of the Privacy Policy. We encourage you to check back periodically to review this Privacy Policy for any changes since your last visit.