

STUDENT DATA PROTECTION POLICY

WHO WE ARE

The National Centre for Circus Arts is a charity and national portfolio organisation funded by Arts Council England as well as various trusts, foundations and individual donors and supporters. Our registered charity number in England and Wales is 1001839 and we are also registered as a company in England and Wales under registration number 2553293. We also operate two subsidiaries.

Circus Space Events Property Company Ltd – Company Number 4027679
Circus Space Events Ltd – Company Number 4027679

PURPOSE OF POLICY

We are committed to protecting your personal information and being transparent about what information we hold about you.

Using personal information allows us to deliver services to you as a student, either being the core course information or additional items like student services and pastoral care.

The purpose of this policy is to give you a clear explanation about how we [and all of our subsidiaries] collect and use the information we collect from you directly and from third parties.

We use your information in accordance with all applicable laws concerning the protection of personal information. This policy explains:

- What information we may collect about you
- How we may use that information
- In what situations we may disclose your details to third parties
- Information about how we keep your personal information secure, how we maintain it for and your rights to be able to access it

If you have any queries about this policy, please contact the Data Protection Officer using the contact details at the end of this document.

INFORMATION COLLECTION

We collect various types of information and in a number of ways:

INFORMATION YOU GIVE US

For example when you enroll on a course we'll store personal information you give us such as your name, email address, postal address, telephone number, and next of kin details.

INFORMATION ABOUT YOUR INTERACTIONS WITH US

For example, when you attend the school, we collect information about your attendance and your timetable. We also record assessments and tutorials, student services interactions and other such information.

INFORMATION FROM THIRD PARTIES

We occasionally receive information about you from third parties. For example, we will receive references or information about attendance if you work with other companies as part of placements

SENSITIVE PERSONAL DATA

Data Protection law recognises that certain categories of personal information are more sensitive such as health information, race, religious beliefs and political opinions.

We only collect this type of information about our students if there is a clear reason for doing so. As an example, we collect health information about participants in our programme of classes and courses.

LEGAL BASIS

There are three bases under which we may process your data:

CONTRACT PURPOSES

When you join a course, you are entering into a contract with us. In order to perform this contract we need to process and store your data. For example we may need to contact you by email or telephone in the case of any issues with your course.

LEGITIMATE BUSINESS INTERESTS

In certain situations we collect and process your personal for purposes that are in our legitimate organisational interests. However we only do this if there is no overriding prejudice to you by using your personal information in this way. We describe below all situations where we may use this basis for processing.

WITH YOUR EXPLICIT CONSENT

For any situations where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information in that specific situation. This will typically be in the event of any targeted marketing activities.

OTHER PROCESSING ACTIVITIES

We also process personal information in the following ways that are within our legitimate organisational interests:

We may analyse data we hold about you to ensure that the content and timing of communications that we send you are as relevant to you as possible.

We may analyse data we hold about you in order to identify and prevent fraud.

In all of the above cases we will always keep your rights and interests at the forefront to ensure they are not overridden by your own interests or fundamental rights and freedoms.

You have the right to object to any of this processing at any time. If you wish to do this, please use the contact details at the end of this policy. Please bear in mind that if you object this may affect our ability to carry out tasks above that are for your benefit.

THIRD PARTIES

There are certain circumstances under which we may disclose your personal information to third parties. These are as follows:

To the subsidiaries described above when it is necessary for them to be able to provide you with products or services that you've requested.

To our own service providers who process data on our behalf and on our instructions (for example our student administration software provider). In these cases we require that these third parties comply strictly with our instructions and with data protection laws, for example around security of personal data.

Where we are under a duty to disclose your personal information in order to comply with any legal obligation (for example to government bodies and law enforcement agencies).

YOUR DEBIT AND CREDIT CARD INFORMATION

If you use your credit or debit card to fund your course, we will ensure that this is carried out securely and in accordance with the Payment Card Industry Data Security Standard (PCI-DSS). You can find more information about this standard [here](#).

We optionally allow you to store your card details for use in a future transaction. This is carried out in compliance with PCI-DSS and in a way where none of our staff members are able to see your full card number. We never store your 3 or 4 digit security code.

MAINTAINING YOUR PERSONAL INFORMATION

We store your personal information only for as long as necessary within legal retention requirements that we have to abide by law.

If there are aspects of your record that are inaccurate or that you would like to remove, you can do this by using the contact details at the end of this policy.

Any objections you make to any processing of your data will be stored against your record on our system so that we can comply with your requests.

SECURITY OF YOUR PERSONAL INFORMATION

We will put in place appropriate safeguards (both in terms of our procedures and the technology we use) to keep your personal information as secure as possible. We will ensure that any third parties we use for processing your personal information do the same.

We will not transfer, process or store your data anywhere that is outside of the European Economic Area.

YOUR RIGHTS TO YOUR PERSONAL INFORMATION

You have a right to request a copy of the personal information that we hold about you and to have any inaccuracies in this data corrected. Please use the contact details at the end of this policy if you would like to exercise this right.

REVISION OF THIS PRIVACY NOTICE

We reserve the right to amend and update this privacy notice as current advice on the GDPR changes.

CONTACT DETAILS AND FURTHER INFORMATION

Please get in touch with us if you have any questions about any aspect of this privacy policy, and in particular if you would like to object to any processing of your personal information that we carry out for our legitimate organisational interests.

Via Post: Data Protection Officer, National Centre for Circus Arts, Coronet Street, London, N1 6HD

Via email: data@nationalcircus.org.uk

Via Phone: 0207 613 4141