

Data Protection Policy - Students

General Statement of Duties

The Company takes the security and privacy of your data seriously. We need to gather and use information or 'data' about you as part of our business and to manage our relationship with you. We intend to comply with our legal obligations under the Data Protection Act 2018 (DPA 2018) and the EU General Data Protection Regulation ('GDPR') which sits alongside and supplements the UK GDPR (with effect on 1st January 2021) in respect of data privacy and security. We have a duty to notify you of the information contained in this policy.

This policy applies to current, past and prospective students, their parents and guardians. If you fall into one of these categories then you are a 'data subject' for the purposes of this policy.

The Company is a '**data controller**' for the purposes of your personal data. This means that we determine the purpose and means of processing of your personal data.

This policy explains how the Company will hold and process your information. It explains your rights as a data subject, including parents' rights and the rights of students aged 12 or over to have access to their personal data.

Data Protection Principles

Personal data must be processed in accordance with six '**Data Protection Principles.**' It must:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- not be kept for longer than is necessary for the purposes for which it is processed; and
- be processed securely.

We are accountable for these principles and must be able to show that we are compliant.

How we define personal data

'**Personal data**' means information which relates to a living person who can be **identified** from that data (a '**data subject**') on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.

This policy applies to all personal data whether it is stored electronically, on paper or on other materials.

This personal data might be provided to us by you, or someone else (such as a parent of a friend who is also attending camp, one of the Company's partners who you have decided to book through, your doctor), or it could be created by us.

We may collect and use the following types of personal data about you (but is not limited to):

- your names, contact details and date of birth;
- the contact details for your emergency contacts;
- your gender;
- information about your booking including start and end dates, chosen programme(s), location and travel details;
- your bank details;
- student passport details in case you require an invitation letter for visa reason;
- name of friend(s) student wishes to share a room with / request to be in the same class or specialist option group with
- information relating to disciplinary proceedings involving you (whether or not you were the main subject of those proceedings);
- attendance records;
- Progress reports and examination results;
- your images (whether captured on CCTV, by photograph or video) if relevant; and
- any other category of personal data which we may notify you of from time to time.

How we define special categories of personal data

Special categories of personal data are types of personal data consisting of information as to:

- your racial or ethnic origin;
- your religious or philosophical beliefs;
- your genetic or biometric data;
- your health;
- your criminal records and proceedings

It is unlikely we will need to hold such data, apart from data regarding your health, although in certain situations we may need to hold and use any of these special categories of your personal data in accordance with the law.

How we define processing

'Processing' means any operation which is performed on personal data such as:

- collection, recording, organisation, structuring or storage;
- adaption or alteration;
- retrieval, consultation or use;
- disclosure by transmission, dissemination or otherwise making available;
- alignment or combination; and
- restriction, destruction or erasure.

This includes processing personal data which forms part of a filing system and any automated processing.

How will we process your personal data?

The Company will process your personal data (including special categories of personal data) in accordance with our obligations under the DPA 2018.

We will use your personal data for:

- making your booking and effectively looking the students while at camp
- complying with any legal obligation; or
- if it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop this processing. See details of your rights below.

We can process your personal data for these purposes without your knowledge or consent. We won't use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

If you choose not to provide us with certain personal data you should be aware that we may not be able to process your booking. For example, without the child's date of birth we are unable to confirm that he/she meets our age requirements. It might also stop us from complying with certain legal obligations and duties which we have.

We will only process special categories of your personal data (see above) in certain situations in accordance with the law. For example, we can do so if we have your explicit consent. If we asked for your consent to process a special category of personal data then we would explain the reasons for our request. You do not need to consent and can withdraw consent later if you choose.

We do not need your consent to process special categories of your personal data when we are processing it for the following purposes, which we may do:

- where it is necessary for carrying out rights and obligations;
- where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent;
- where you have made the data public;
- where processing is necessary for the establishment, exercise or defence of legal claims; and
- where processing is necessary for the purposes of medicine

We will take reasonable steps to ensure the only relevant staff have access to your personal data, that it is stored securely and is not accessible to unauthorised staff. All staff will be made aware of this policy and their duties in accordance with the Data Protection Act.

Subject access requests

- You, as the data subject, can make a '**subject access request**' ('SAR') to find out the information we hold about you. This request must be made in writing.
- We will respond within one month unless the request is complex or numerous in which case the period in which we must respond can be extended by a further two months.
- There is no fee for making a SAR. However, if your request is manifestly unfounded or excessive we may charge a reasonable administrative fee or refuse to respond to your request.
- Please note that certain data is exempt from the right of access under the Data Protection Act, such as information which identifies other individuals, information which we reasonably believe is likely to cause damage or distress, or information which is subject to legal professional privilege

EEA/EU Representative

Now that the UK has left the EU, we are required as per Article 27 of Regulation (EU) 2016/679 (General Data Protection Regulation - "the GDPR") to appoint an EU Representative as a point of contact for EU citizens to get in touch with us about their data.

Gallery Teachers, a division of Roxinford Education Group Ltd, is hereby appointed as EU Representative to Exsportise Limited. Gallery Teachers has offices in the UK, Italy and Spain.

The following tasks are the responsibility of the Representative:

- Help Exsportise Ltd. provide individuals with access to their data subject rights
- Act as the main point of contact for Supervisory Authorities
- Alert Exsportise Ltd. to any correspondence received from Supervisory Authorities
- Alert Exsportise Ltd. to any inquiries received from data subjects
- Be readily available to carry out the above mentioned work

All notices, demands, or requests should be sent to: dpo@galleryteachers.com.

Your data subject rights

- You have the right to information about what personal data we process, how and on what basis as set out in this policy.
- You have the right to access your own personal data by way of a subject access request (see above).
- You can correct any inaccuracies in your personal data. To do so you should contact the person responsible for Data Protection.
- You have the right to request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected.
- While you are requesting that your personal data is corrected or erased or are contesting the lawfulness of our processing, you can apply for its use to be restricted while the application is made.
- You have the right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop.

- You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.
- With some exceptions, you have the right not to be subjected to automated decision-making.
- You have the right to be notified of a data security breach concerning your personal data.

Please note that we will only grant a student direct access to his/her data if he/she is aged 12 or over and with reasonable belief that the student understands the nature of the request. Students should be aware that we may disclose their personal data to their parent, guardian or partner company the parents have booked through. Should a student approach a staff member in confidence and explicitly refuse to give consent to his/her data being shared with his / her parents or guardian, we will maintain confidentiality unless we believe disclosure to be in the student's or other students' best interest.

Use of Personal Data for Publicity and Marketing Purposes

We take limited photos and/or videos of our students enjoying the courses. We may from time to time share these images through our social media and blogs to allow those who are involved in the course (including parents, students and representatives) to see the activities that are being undertaken.

We make sure that if we have blogs from the course that these are password-protected so that only those directly involved with the course (parents, staff, students, representatives) will be able to view them.

We also make sure that the student's full name will not be displayed or tagged with the image.

Photos/videos may also be taken and used/shared as follows:

- Group course/class photos (so students return home with a photo of them with the other course attendees)

The places that we may use these images are:

- Centre blog posts
- On our website, brochure and other printed publicity material
- Social media posts - we do not tag our students in social media posts
- Used by official representatives overseas for their website/brochure
- Other professional organisations, such as The British Council and other affiliated bodies
- We may use these images in future years for the above purposes.

If you do not wish the student's image to be used for marketing purposes, please contact admin@exsportise.co.uk. Students should contact their Centre Manager to withdraw consent or if they have spotted the images being used in another context. In accordance with our safeguarding policy, we will not permit photographs, videos or other images of young people to be taken without the consent of the parents/carers and the child.