



GDPR Policy 2026

Date of Policy: **27th March 2026**
Policy Responsibility: **Sam Gibbs (Principal)**
Updated or reviewed: **Annually**

PERFORMERS THEATRE COMPANY

INTRODUCTION

Performers Theatre Company is the Data Controller for the purposes of UK data protection law. This means we are responsible for deciding how we hold and use personal information.

At Performers Theatre Company we are committed to protecting your personal information and being transparent about what we do with it. We are committed to using your personal information in accordance with all applicable laws concerning the protection of personal information and not to do anything with your information you would not reasonably expect.

If you have any questions about this policy or how your data is handled, please contact:

Email: admin@performerstheatrecompany.com

We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

LAWFUL BASIS FOR PROCESSING

Performers Theatre Company processes personal data under the following lawful bases:

- **Consent** – for example, use of photographs and marketing
- **Contract** – to provide classes, services, and performances
- **Legal obligation** – including safeguarding, licensing, and employment requirements
- **Legitimate interests** – to manage and operate the organisation effectively

We only collect and retain personal data that is necessary for the purposes outlined in this policy.

THE 7 RIGHTS OF INDIVIDUALS

1) The right to be informed

Performers Theatre Company collect all parent and student details on registration via ClassManager. We need to know parent/carer's names, addresses, telephone numbers, email addresses, as well as emergency contact details. We also need to know children's full names, addresses and date of birth along with any medical and SEND requirements. This information is kept fully confidential.

We may share personal data with trusted third parties where necessary, including local authorities for performance licensing and external providers for DBS checks. All third parties are required to handle data securely and in accordance with data protection law. Where consent is required, Performers Theatre Company will seek clear and informed consent before sharing personal data.

As an employer, Performers Theatre Company is required to hold data on its teacher's names, addresses, email addresses, telephone numbers, date of birth, National Insurance numbers, photographic ID such as passport and driver's license and bank details. This information is also required for Disclosure and Barring Service checks (DBS) and proof of eligibility to work in the UK. This information is sent via a secure file transfer system to Care Check for the processing of DBS checks. DBS Numbers and date of issue are also held in a password protected folder. Performers Theatre Company also holds the right to dismiss any member of staff who do not abide by these laws.

2) The right of access

At any point an individual can make a request relating to their data and Performers Theatre Company will need to provide a response (within 1 month). Performers Theatre Company can refuse a request, if we have a lawful obligation to retain data but we will inform the individual of the reasons for the rejection. The individual will have the right to complain to the ICO if they are not happy with the decision.

3) The right to erasure

As an individual you are in your right to request the deletion of your data where there is no compelling reason for its continued use. Performers Theatre Company has a legal duty to retain certain records for specified periods in line with legal and safeguarding requirements.

Children's accident and injury records are retained for 19 years (or until the child reaches 21 years), and 22 years (or until the child reaches 24 years) for Child Protection records. Staff records must be kept for 6 years after the member of staff leaves employment, before they can be erased. This data is archived securely onsite and shredded after the legal retention period.

4) The right to restrict processing

Parents and staff can object to Performers Theatre Company processing any of their data. This means that records can be stored but must not be used in any way.

5) The right to data portability

Performers Theatre Company requires data to be transferred from one IT system to another; such as from Performers Theatre Company ClassManager to the Local Authority for performance licences. These recipients use secure file transfer systems and have their own policies and procedures in place in relation to GDPR. All systems are password protected.

6) The right to object

Parents, visitors and staff can object to their data being used for certain activities like marketing or research.

7) The right not to be subject to automated decision-making including profiling.

Automated decisions and profiling are used for marketing based organisations. Performers Theatre Company does not use personal data for such purposes.

STORAGE AND USE OF INFORMATION

To ensure all personal information is maintained in the most secure manner, all of Performers Theatre Company systems/phones are password protected. On occasion, paper documents of personal data may be required, such as ticket order forms, costume requests, etc. These hard copies will be kept in a confidential folder that only the Principal and Business Manager can access.

Performers Theatre Company stores personal data held visually in photographs or video clips or as sound recordings. No names are stored with images in photo albums, displays, on the website or on Performers Theatre Company social media sites. Images and videos are only used or shared where appropriate consent has been obtained.

We take appropriate technical and organisational measures to protect personal data against unauthorised access, loss, misuse, or disclosure.

DATA BREACH PROCEDURE

In the event of a data breach, Performers Theatre Company will:

- Assess the risk to individuals
- Take immediate steps to contain the breach
- Notify the Information Commissioner's Office (ICO) where required
- Inform affected individuals if there is a high risk to their rights and freedoms

All data breaches will be recorded internally.

SUMMARY

GDPR means Performers Theatre Company:

- Manage and process personal data properly
- Protect the individual's rights to privacy
- Provide an individual with access to all personal information held on them

Disclaimer: When we collect your personal information we use strict procedures and security features to prevent unauthorised access. However, no data transmission over the Internet is 100% secure. As a result, while we try to protect your personal information, Performers cannot guarantee the security of any information you transmit to us and you do so at your own risk.

WEBSITE

This section applies specifically to the use of our website.

If you browse and use our website at www.performerstheatrecompany.com, you are agreeing to comply with and be bound by the following terms and conditions of use, which together with our GDPR policy govern Performers Theatre Company's relationship with you in relation to this website. If you disagree with any part of these terms and conditions, please do not use our website. Please go to our Policies page and read our Terms and Conditions if needed.

Links

Our website may include links to other sites of our accredited partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.