

Green Room Place (GRP) Data Protection & Privacy Policy

Updated & Approved by Company Directors and Qualified Pastoral Staff on January 27th, 2025.

1. Introduction

Green Room Place, Ltd. is committed to protecting and respecting the privacy of all individuals whose personal data we process. This **Data Protection Policy** outlines how we collect, use, store, and protect personal data, in compliance with the **Data Protection Act 2018** and the **General Data Protection Regulation (GDPR)**.

As part of our commitment to safeguarding the rights and freedoms of individuals, this policy applies to all staff, students, contractors, volunteers, and other stakeholders who interact with Green Room Place, Ltd. in any capacity. We ensure that personal data is processed in a lawful, fair, and transparent manner, only for the purposes for which it is collected.

2. Purpose of Data Collection

We collect and process personal data to provide the following services:

- **Educational Services:** To facilitate and manage music courses, workshops, and festivals, including registration, scheduling, and communication with students and staff.
- **Safeguarding and Welfare:** To ensure the safety, health, and well-being of students, particularly during residential courses or events.
- **Marketing and Communications:** To send updates, promotional materials, and newsletters about our services (subject to the individual's consent).
- **Legal and Financial Requirements:** To fulfill any legal or contractual obligations, including processing payments, invoices, and maintaining financial records.

We will only collect personal data that is necessary for these purposes and will not use it for any unrelated activities without prior consent.

3. Types of Personal Data We Collect

The types of personal data we may collect include, but are not limited to:

- **Personal Identification Information:** Name, address, phone number, email address, and date of birth.
- **Health and Emergency Information:** Relevant medical information, emergency contact details, and any specific health requirements (e.g., allergies, disabilities).
- **Educational Records:** Information about academic performance, musical experience, and course participation.
- **Photographs and Video:** Images and videos taken during events or performances (with appropriate consent).
- **Payment Information:** Bank details or payment methods for processing course fees and other services.
- **Communication Data:** Email correspondence, feedback forms, and interactions through social media (in line with our social media policy).
- **Identity Verification:** A copy of passport or UK government-issued ID to verify identity for certain services or activities (e.g., registration, visa purposes).

4. Lawful Basis for Processing Personal Data

Under the **GDPR**, personal data must be processed lawfully, fairly, and transparently. We process personal data based on the following lawful bases:

- **Consent:** Where necessary, we will obtain explicit consent from individuals (e.g., for marketing or use of photographs).
- **Contractual Necessity:** To provide our services and fulfill agreements with students, staff, and contractors.
- **Legal Obligation:** To comply with legal and regulatory requirements, such as safeguarding regulations.
- **Legitimate Interests:** For purposes such as improving services, communications, and administrative operations, provided that these interests do not override the individual's rights and freedoms.

5. Data Retention

We will not retain personal data for longer than necessary. The retention period will vary depending on the nature of the data and the purpose for which it was collected. As a guideline:

- **Student Data:** We will retain student records for a period of **6 years** after the end of the relevant course or event for legal and financial purposes, including safeguarding and contractual obligations.
- **Marketing and Communication Data:** Personal data used for marketing or promotional purposes will be kept for as long as the individual subscribes or until they withdraw their consent.

- **Staff and Contractor Data:** We will retain staff and contractor records for a period of **7 years** after the end of their employment or contract.
- **Emergency and Health Data:** Health-related information will be retained as long as necessary for the safety and well-being of students during their time at Green Room Place and for up to **3 years** following the course or event.

Once the retention period has expired, data will be securely deleted or anonymised.

6. Data Security

We are committed to ensuring the security of personal data. We implement appropriate technical and organizational measures to protect personal data against unauthorized access, alteration, disclosure, or destruction. This includes:

- **Encryption:** Using encryption methods to protect sensitive data during storage and transmission.
- **Access Controls:** Limiting access to personal data to authorized personnel only.
- **Regular Security Audits:** Conducting periodic assessments and audits of our data protection measures to identify potential vulnerabilities.
- **Training:** Ensuring all staff are trained on data protection best practices and their responsibilities under the **GDPR**.

In the event of a data breach, we will notify the Information Commissioner's Office (ICO) within **72 hours**, as required by law, and will inform affected individuals when necessary.

7. Sharing Personal Data

We will not share personal data with third parties except in the following circumstances:

- **Service Providers:** We may share data with trusted third-party service providers who assist in the operation of Green Room Place, Ltd. (e.g., payment processors, event venues, healthcare providers). These service providers are required to comply with our data protection standards and use the data only for the specific purposes we outline.
- **Legal Obligations:** We may share data if required to do so by law, regulation, or court order (e.g., with safeguarding agencies, law enforcement, or regulatory bodies).
- **Emergency Situations:** If there is an emergency involving a student's safety, health, or well-being, we may share personal data with emergency contacts, medical providers, or authorities as necessary.

We will never sell or rent personal data to third parties.

8. Cookies and Tracking

What are Cookies?

Cookies are small text files placed on your device (computer, phone, etc.) by websites you visit. They are used to collect and store information about your activity on those websites to enhance your experience. Cookies are commonly used to remember preferences, login details, and to track website usage for analytical purposes.

How We Use Cookies

At **Green Room Place**, we use cookies to improve your experience while using our websites (**greenroomtheory.com** and **greenroompianofestival.com**). The cookies we use are categorized as follows:

- **Essential Cookies:** These cookies are necessary for the proper functioning of the website, such as remembering your preferences and login information during your visit.
- **Analytical Cookies:** We use cookies to collect information about how visitors use our websites (e.g., which pages are visited, how long users spend on a page). This helps us understand how our website is being used and how we can improve it.
- **Marketing Cookies:** These cookies are used to track visitors across websites to display relevant advertisements or marketing communications based on your browsing history. This helps us show you content that might be of interest to you.

Managing Cookies

You can manage or disable cookies through your browser settings. Most browsers allow you to refuse cookies, delete cookies, or inform you when cookies are being sent. However, please note that blocking or disabling certain cookies may affect your ability to use some features of our websites effectively.

For more detailed information on how to manage cookies, visit the **Help** section of your browser settings.

Tracking and Analytics

We use third-party services like **Google Analytics** to collect data on how visitors use our websites. This allows us to analyze traffic patterns, improve content, and provide a better experience for our users. Google Analytics may use cookies to collect data such as your IP address, browser type, and referring website.

You can opt out of Google Analytics tracking by using the Google Analytics Opt-Out Browser Add-On.

9. Individuals' Rights Under Data Protection Law

As a student, staff member, or individual interacting with Green Room Place, Ltd., you have the following rights with respect to your personal data:

- **Right to Access:** You have the right to request a copy of the personal data we hold about you.
- **Right to Rectification:** If your personal data is inaccurate or incomplete, you have the right to request that it be corrected.
- **Right to Erasure:** You may request that your personal data be deleted under certain circumstances (e.g., when it is no longer necessary for the purposes it was collected).
- **Right to Restriction of Processing:** You may request that we limit the processing of your data in certain circumstances.
- **Right to Data Portability:** You have the right to request that we transfer your data to another organization, in a structured, commonly used, and machine-readable format.
- **Right to Object:** You may object to the processing of your data for certain purposes, including marketing or profiling.
- **Right to Withdraw Consent:** If we process your data based on your consent, you have the right to withdraw that consent at any time.

10. Complaints

If you believe that your personal data has been processed inappropriately or that your rights have been violated, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**. You can contact the ICO at:

- **Website:** <https://ico.org.uk>
- **Phone:** 0303 123 1113

If you are unsatisfied with how your complaint is handled by us, you may also contact the **ICO** for further assistance.

This Data Protection Policy will be reviewed periodically and updated as necessary to ensure compliance with relevant laws and to reflect any changes in how we collect, process, or protect personal data.