



Gems Performing Arts & Gems Holiday Clubs

Privacy Policy

1. Policy Statement

At Gems Performing Arts and Gems Holiday Clubs, we are committed to protecting your privacy and handling your family's personal data transparently, securely, and in strict accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This Privacy Policy explains how we collect, use, store, and protect your information when you register for our classes, visit our website, or communicate with us.

If you have any questions regarding your personal data or wish to exercise your data rights, please email us at emma@gemsperformingarts.com. We promise to keep your data safe. We never pass on, rent, or sell your personal data to any other businesses or individuals.

2. What Personal Data We Collect & Why

When you enquire, sign up, or book a place for your child in one of our classes, workshops, or holiday clubs, we may collect specific details required to deliver our services safely and keep in touch with you:

- **Sign-Up & Class Booking (Performance of Contract & Legal Duty):** Enrolments are securely processed through our private **Class4Kids** database (which is fully UK GDPR compliant). We collect:
 - Your full name, postal address, email address, and emergency telephone numbers.
 - Your child's full name, date of birth, age, and school (to ensure accurate class placement).
 - Authorised collection details (names and contact numbers of individuals permitted to pick up your child) for child protection and safeguarding purposes.
 - Medical information, severe allergy details, and Special Educational Needs (SEND) information essential for health and safety.
 - Optional details, such as how you heard about us or which school your child attends (to help group classmates together).
- **General Enquiries & Keeping in Touch:** If you contact us via email, phone, post, or our website contact form, we collect your contact details to respond to your inquiry.
- **Marketing & Mailing Lists (Explicit Consent):** You have the choice to opt in to receive updates on Gems classes, workshops, holiday camps, and free local events. If you opt in, your email address is saved to our **Mailchimp** database (which is fully UK GDPR compliant). You can

unsubscribe at any time by clicking the "Unsubscribe" link at the bottom of any marketing email or by contacting us directly.

3. How We Use Your Personal Data

We use your personal data strictly for the following purposes:

- To send course information, class reminders, script materials, performance details, and fee payment invoices.
- To fulfill health, safety, and first aid requirements by sharing necessary medical details and child names with your child's assigned lead tutor.
- To communicate important changes to class timetables or emergency venue updates.
- Where you have given explicit opt-in consent, to send promotional updates regarding upcoming terms, workshops, and holiday clubs.

4. Approved Information Sharing & Third Parties

We do not share your personal data except in the following necessary operational or legal circumstances:

Recipient / System	Purpose & Security Controls
Class4Kids (Booking System)	Stores all booking forms and class registers. Access is restricted exclusively to the Principal and authorised club managers via password-protected accounts.
Freelance Teaching Staff	Tutors receive password-protected registers containing children's first names, relevant medical/allergy notes, and emergency phone numbers. Tutors sign confidentiality agreements and lose access to register files once a term/club concludes.
After-School Clubs	Under legitimate interest, we share student names, classes, and school year groups with schools for pupil safety and handover verification.
Mailchimp (Email Marketing)	Used strictly for parents who explicitly opt in to marketing emails. Includes automated unsubscribe features on every email.
Child Safeguarding Authorities	In the rare event of a child protection concern, we are legally required to provide relevant information to Local Authority Safeguarding Boards or the Police.

5. Photography, Media & Show Programmes

- **Photos & Videos:** We occasionally capture photo and video footage during classes, workshops, and performances for marketing on our website, print materials, and social media platforms (Facebook, Instagram, Email). Footage is only taken and used if parents grant permission during registration. Images shared online will **never contain identifying personal details** (such as full names or ages).
- **Parent Social Media Usage:** We ask parents not to post unedited performance videos or photos online if they contain images of other children, unless permission has been granted by those children's parents.
- **Show Programmes:** Event programmes will only list a child's first name and surname initial (unless specific consent is given). Parents can opt out of programme listings during event enrolment.
- **Public Events:** If children perform in public venues not directly organised by Gems, we cannot control photography taken by general members of the public.

6. Security Precautions & Data Storage

We take data security extremely seriously. Web forms and booking portals operate over encrypted connections. Digital registers and medical files stored on company laptops and mobile devices are password-protected. Any paper registers carried by lead staff on-site are kept supervised at all times and locked away when not in use.

7. How Long We Retain Your Personal Data

We retain data in accordance with UK statutory rules and Ofsted childcare requirements:

- **Standard Enrolment & Attendance Records:** Retained for **3 years** post final attendance.
- **Financial & Payment Records:** Retained for **6 years** due to HMRC legal obligations.
- **First Aid & Accident Incident Records:** Retained for **21 years** due to statutory personal injury legislation.
- **Child Safeguarding Records:** Retained for a minimum of **6 years** (up to indefinitely on a case-by-case basis).

8. Website Cookies

Like most websites, our website uses basic cookies to analyze website traffic, popular pages, and visitor duration. This data is entirely anonymous and contains no personal information (such as names or email addresses). You can turn off cookies at any time by adjusting your browser settings.

9. Your Rights Under UK GDPR & Complaints

Under the UK GDPR, you have the following rights regarding your personal information:

- **Right to Access:** Request a copy of the personal information we hold about you or your child.
- **Right to Rectification:** Request corrections to inaccurate or incomplete information.
- **Right to Erasure ("Right to be Forgotten"):** Request deletion of your personal details, subject to our legal retention obligations (such as financial or first aid records).
- **Right to Withdraw Consent:** Unsubscribe from marketing communications at any time.

To exercise any of these rights, please contact Emma Drysdale at

emma@gemsperformingarts.com. If you feel your data has not been handled correctly, you also have the right to lodge a complaint with the UK **Information Commissioner's Office (ICO)** at www.ico.org.uk.

This policy was updated: Emma Drysdale	Date: 3 / 9 / 2026
To be reviewed: 3 / 9 / 28	signed: 

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