

# The Lake District School of Art - Privacy Policy

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## Who are we?

The Lake District School of Art (LDSA) is a Business which provides residential course in En-Plein Air painting in the Lake District.

For the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR), The LDSA is the 'controller' of business and learner personal data. Our registered address is Rosegarth, Cumberhills Road, DUFFIELD, Derbyshire, DE56 4HA.

The LDSA is committed to data security and the fair and transparent processing of personal data. This privacy policy (Policy) sets out how we treat business and client personal data. Please read this Policy carefully as it contains important information on who we are, how and why we collect, store, use and share your personal data, your rights in relation to your personal data, how to contact us, and how to contact supervisory authorities in the event that you would like to report a concern about the way in which we process your personal data.

Personal data means information that can be linked directly or indirectly to a physical living person. Examples of personal data are name, address, phone number and e-mail address. Under certain circumstances, information about the IP address and your user activity may also constitute Personal Data.

Processing of personal data includes all handling of personal data such as collection, registration and storage.

A data controller is an individual who alone or together with others determines the purposes and means of processing personal data and is ultimately responsible for the processing in accordance with applicable law.

## Contact

If you have any queries about this Policy, the way in which we process personal data, or about exercising any of your rights, you can contact us by sending an email to [info@lakedistrictschoolofart.co.uk](mailto:info@lakedistrictschoolofart.co.uk) or write to: Privacy Officer, The LDSA, Rosegarth, Cumberhills Road, DUFFIELD, Derbyshire, DE56 4HA.

## Introduction

THE LDSA respects the privacy of every person for whom we have personal data. We comply with data protection legislation such as the Data Protection Act 1998 and the General Data Protection Regulation which regulates the processing of data and ensures that your data is processed fairly and lawfully, is kept secure and only that data necessary for any processing is kept.

This Privacy Policy summarises the information we may collect about you in order to provide you with services you have requested or to provide services likely to meet your needs. It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

It explains what we do with your personal data, whether we are in the process of helping you find a training course, continuing our relationship with you, providing you with a service, receiving a service from you or you are visiting our website.

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This Privacy Policy applies to the personal data of our website users, clients, suppliers, and other people whom we may contact in order to find out more about our learners or whom they indicate is an emergency contact. It also applies to the emergency contacts of our staff.

If you register on the website as a potential client and provide us with personal data, we will process such personal data on the basis that it is necessary to do so in order to perform any contract you may enter into with us.

We encourage you to read this Privacy Policy carefully and use it to make informed decisions. By using the Services, you agree to the terms of this Privacy Policy and your continued use of the Services constitutes your ongoing agreement to this Privacy Policy.

## Who might we collect information from?

We may collect personal data from, but not restricted to:

- **Clients**

If you are an LDSA client, we need to collect and use information about you, or individuals at your organisation:

- in the course of providing you with our services;
- to communicate with you in relation to the provision of the contracted products and services;
- to provide you with information about our awards and events, offers and promotions, related to the products and/or services.

- **Suppliers**

We need a small amount of information from our Suppliers to ensure that things run smoothly. We need contact details of relevant individuals at your organisation so that we can communicate with you. We also need other information such as your bank details so that we can pay for the services you provide (if this is part of the contractual arrangements between us).

- **People whose data we receive from learners and staff, such as referees and emergency contacts:**

In order to provide clients with suitable learning opportunities safely and securely and to provide for every eventuality for them and our staff, we need some basic background information. We only ask for very basic contact details, so that we can get in touch with you either for a reference or because you've been listed as an emergency contact for one of our learners or staff members.

Depending on the type of personal data in question and the grounds on which we may be processing it, should you decline to provide us with such data, we may not be able to fulfil our contractual requirements or, in extreme cases, may not be able to continue with our relationship.

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## Children's personal data

Our website is not intended for people under the age of 16 and we will not deliberately collect personal data about persons under the age of 16.

## What personal data do we collect and how is this collected?

We only collect personal information if we have your permission or if we have reasonable commercial reasons for doing this.

We will only use personal information for the purpose it was collected. Should we ever wish to use it for another purpose we will contact you first asking you for your consent. We primarily use data to communicate with you, deliver the service you have requested, or services that might be of interest to you (subject to your right to opt out with the details on how to do this found on our communications to you), to verify your identity when taking payment or to meet legal, regulatory and compliance requirements.

We may collect some of the following data such as name, company that employs you, home address and post code, email address, date of birth, telephone number, next of kin, content you post on our websites, and content you read on our websites plus various other data.

This data may be collected when you:

- complete a form on our website;
- post content to our website;
- complete an enrolment or course evaluation form;
- correspond with us by phone, e-mail, or in writing;
- report a problem;
- sign up to receive our communications;
- enter into a contract with us to receive products and/or services.

If you visit our website we may record your IP address, registration details and your browsing history such as the pages you have visited within our sites. The LDSA IP address discloses nothing about you other than the IP address used to access our website. If you receive an email from us and click on a link, we may track your response or the pages you visit.

When you pay us, we will record details of the financial transaction but do not directly store your debit or credit card information.

### ▪ Sensitive personal data

In certain cases, we may collect certain sensitive personal data from you (eg information about your racial or ethnic origin, physical or mental health). However, we will only do so on the basis of your explicit consent.

### ▪ Information about other people

If you provide information to us about any person other than yourself, such as your relatives, next of kin, your advisers or your suppliers, you must ensure that they understand how their

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information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

### How do we process and use the information?

We may use your personal data where this is necessary to pursue our legitimate interests as a provider of learning services including to:

- provide you with services for which you have either registered or expressed an interest in;
- undertake administration in relation to services for which you have registered;
- provide you with a certificate, credential or other record of learning;
- contact you directly in relation to our quality assurance processes, investigations, appeals, and complaints;
- contact you directly in relation to new and existing services which we offer;
- assess and provide reasonable adjustments in relation to your learning or assessment where requested;
- send you periodic messages and information (if you do not want to receive such communication please send an e-mail to [info@lakedistrictschoolofart.co.uk](mailto:info@lakedistrictschoolofart.co.uk));
- respond to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

### Who do we share your personal information with?

As a rule, we will not disclose your personal data to other third parties, but if so, the disclosure will be affected in accordance with this Privacy Policy. We take appropriate and reasonable legal, technical and organisational measures to ensure that your data is handled securely and with adequate protection when transferred or shared with third parties.

- **Suppliers and Subcontractors:** We may disclose your personal information to providers or subcontractors in order to contact you if necessary to fulfil our obligations to you.
- **Authorities:** We may disclose necessary information to authorities such as the police, tax authorities or other authorities you have approved that we may provide such information to or as we must by law provide information.
- We will never disclose your Personal Information to any third party who, under this Privacy Policy, is not authorised to access your Personal Information.
- *We do not share personal data with 3rd parties for marketing purposes, other than with the direct consent of the individual(s) which may be withdrawn at any time.*

### How long do we keep your data for?

Personal Information will be retained by The LDSA in such a way that you can be identified only as long as is necessary for The LDSA's processing activities. Data is not kept any longer than is required for the purposes of the processing. As we collect data for many different purposes there is not a single retention period for all data. We instead carefully assess the length of time to retain data according to the processing purpose and to comply with our legal obligations.

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When data is no longer required for the purposes of the processing it is securely removed from our systems.

Please note that we may retain the information we collect for as long as needed to provide the Services and to comply with our legal obligations, resolve disputes and enforce our agreements.

Please note that some of the information that is gathered about you may arrive from the web and is public by other platforms. In some cases, you may encounter your details again after request for removal, in case they were re-collected over the web, contributed by other partners or in other means that are not including access to your device.

### **Where do we store your personal data and how is it protected?**

The LDSA data we collect from you, publicly available sources and from our trusted business partners is stored in the LDSA database.

In addition, the database includes a vast amount of Profiles relating to individuals, which was lawfully obtained by The LDSA from business partners who own established and legitimate directories or from publicly available sources.

We take reasonable steps to protect your personal data from loss or destruction. We also have procedures in place to deal with any suspected data security breach.

### **Security & Confidentiality**

The LDSA takes commercially reasonable physical, technical and administrative measures to protect personal information from theft, misuse or accidental destruction and to keep it confidential. We aim to protect personal information but cannot provide a 100% guarantee of security. All employees who access your data are obliged to keep the information confidential and secure and not to use it for any other purpose other than that they are contracted to carry out for us.

### **Your Rights**

We respect your privacy rights and therefore you may contact us at any time and we shall work diligently to respect your choices and requests regarding your Personal Information. The LDSA purpose of the list stipulated below is to allow Users and Contacts to exercise their rights under applicable privacy and data protection regulations:

- *Right to access*

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given above. Please include with your request information that will enable us to verify your identity. We will respond within 1 month of request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information, or if there is no basis for your request, or if it is excessive.

- *Right to rectification*

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided above to let us know if any of your personal data is not

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accurate or changes, so that we can keep your personal data up-to-date. Please note that we may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

- *Right to erasure*

You have the right to request the deletion of your personal data where, for example, the personal data is no longer necessary for the purposes for which it was collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided above.

- *Right to object*

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the processing of your personal data, please contact us using the contact details provided above.

- *Right to restrict processing*

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have queried the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided above.

- *Right to restrict data portability*

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request make such request, please contact us using the contact details provided below.

Our website may link to other websites. The LDSA is not responsible for the privacy policies of those websites nor does it have or accept any liability for their content.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

### **How do we safeguard and transfer your information?**

We take great care in implementing and maintaining the security of the Services and your information. We employ industry standard procedures and policies to ensure the safety of your information and prevent unauthorized use of any such information. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain

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unauthorised access or abuse our Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

## Cookies

We use cookies to monitor web usage. Cookies are written to the hard drive of a web user, they contain no personal information about the website user and only keep a record of the sites visited and actions on the web site. Some cookies expire after your browser is closed whilst others stay on your hard drive. We use them for Google Analytics purposes (they are not used for advertising purposes) on an aggregated information basis and to assess your areas of interest - they are used to identify the number of unique visitors to a site, to improve further web visits (store preferences, user name and passwords so you don't need to reinput every time you visit) and to improve the user experience for you by, amongst other things, providing content based on your preferences.

Most browsers offer you ways to control or block cookies should you wish to. The LDSA's browser controls will usually be found in the "options" or "preferences" menu in your toolbar. The LDSA "help" portion of the toolbar on most browsers will tell you how to stop or manage cookies. Note that should all cookies be rejected we are unable to match site content appropriate to the preferences given to us by previous visits and you will not be able to fully utilise all of the web site features. For further information on cookies visit [aboutcookies.org](http://aboutcookies.org) or the Information Commissioner's webpage on cookies [ico.org.uk/for-the-public/online/cookies/](http://ico.org.uk/for-the-public/online/cookies/)

## Withdrawal of consent

Where you have provided consent, if you should wish to withdraw that consent, you can let us know by contacting us using the contact details provided above.

## Complaints

You have the right to see, erase and correct data we hold, the right to restrict the processing we do, and the right to object to it and to have your data transferred to a third party. If you wish to do any of these things or have any questions about how we use your data or wish to make a complaint about any privacy issues, please contact us using the contact details above.

Requests will be dealt with and responded to within a reasonable period, and no longer than 30 days. If you are not satisfied with the way your request was handled, you have the right to lodge a complaint with the supervisory authority - details of which are given below:

Information Commissioner's Office

<https://ico.org.uk/concerns/>

Telephone: +44 303 123 1113

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## Changes to this Policy

It is important to point out that we may amend this Privacy Policy from time to time. Any changes we may make to our Policy in the future will be posted on this page. If you want to stay up to date, please check back frequently to see any updates or changes to our Policy.

Last Updated: 21 February 2020