# **TERMS & PRIVACY**

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**JASSPA** (James Allen's Saturday School for the Performing Arts, including SLYO) is a department at James Allen's Girls' School, whose registered office is located at 144 East Dulwich Grove, London, SE22 8TE, registered in England under Company No 3636087.

JASSPA maintains this website jasspa.org.uk and the information and materials on the Site.

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# PRIVACY POLICY

This privacy policy explains how personal information is collected, used, and disclosed by **JASSPA**. This Policy applies to visitors and users of **JASSPA's** website. By visiting or using the Site to the extent permitted by applicable law, you are consenting to us gathering and processing information about you in accordance with this Policy, although consent may not be required for all of the elements described in this Policy.

This Policy does not cover third parties or their services and we do not take any responsibility for how such third parties may use any information they collect. For information about third-party privacy practices, please consult with them directly.

## I. INFORMATION WE COLLECT

**Personal Information.** By visiting or using the Site, we may collect the following categories of personal information you provide to us: name; title; email address; postal address; phone number; children's names; marketing responses; admissions follow-ups; and other information you may provide about yourself to the Site or to which you provide us with access via third-party platforms.

We do not proactively collect personal information considered as sensitive personal information such as health-related or financial information on the Site. However, our Site may include text boxes which are designed for you to provide your choice of certain information about your marketing preferences.

If you are an existing **JASSPA** family, we will combine this information with information we collect on the Site and use it for the purposes described below.

**Device Information**. When you visit the Site or open communications such as emails, some information is automatically collected from devices (e.g., mobile, computer, laptop, tablet) used to visit or use the Site including, but not limited to, operating system, access times, browser information, settings, and other data about your device that we use to provide the services or as otherwise described in this Policy. We also collect information about your usage and activity on the Site using certain technologies, such as cookies, web beacons and other technologies (see V Cookies for more details).

**Location Information.** If you use our Site, we may receive your generic location (such as city or neighbourhood). We may use and store this information to provide and improve features of the Site, for example, to tailor the Site on a needs-based manner to better facilitate your requests and to provide you more relevant content.

#### **II. HOW WE USE YOUR INFORMATION**

We may use your information for the following purposes to: provide you with the services, and functionality offered through the Site and fulfil your requests, including, but not limited to; communicate with you about your enquiry or use of the Site, services, or functionality; respond to, or follow up on, your comments and questions, and otherwise provide customer service; communicate with you about special events; operate and improve the Site, services, and functionality; process and provide events to attend, if applicable; link or combine with other information we get from third parties to help understand your needs and provide you with better service; perform statistical analysis; protect, investigate, and deter against fraudulent, unauthorised, or illegal activity; comply with our policies ,procedures and legal obligations; and as otherwise consented to by you and as required or permitted by applicable law.

If you do not provide us with certain of your information, we may not be able to fulfill the requested Purpose of collection, such as to respond to your queries or provide the Site to you.

**Electronic Communications.** Consistent with the above Purposes, we may communicate with you via electronic messages, including email, text message, or mobile push notification to, for example: send you information relating to our school, including event reservation and waitlist confirmations and updates, receipts, technical notices, updates, security alerts, and support and administrative messages; and/or, subject to the Your Choices section, below, and/or applicable law, communicate with you about events, upcoming events, and other news about services offered by JASSPA.

**Retention.** We will retain your information for the period necessary to fulfil the Purposes outlined in this Policy and as otherwise needed to comply with applicable law and internal company policies.

## **III. HOW WE SHARE YOUR INFORMATION**

We do not share your information with third parties other than as described above and as follows:

We may disclose your information to regulatory authorities, courts, government agencies and other third parties where we believe that doing so would be in accordance with or permitted or required by any applicable law, regulation or legal process, to defend the interests, rights, and/or property of **JASSPA** or others, or to respond to emergencies.

We may otherwise share your information as directed by you or subject to your consent.

Information You Share Socially. The Site may allow you to connect and share your actions, comments, content, and information publicly or with friends. The Site may also allow you to connect with us on, share on, and use third-party platforms, including those on which JASSPA has a presence. Please be mindful of your personal privacy needs and the privacy needs of others as you choose whom to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others. JASSPA also does not control the privacy practices of third-party platforms. Please contact those sites and services directly to learn about their privacy practices.

# **IV. SECURITY OF YOUR INFORMATION**

**JASSPA** takes commercially-reasonable technical, administrative, and physical security measures designed to protect your information from loss, misuse, unauthorised access, disclosure, alteration, and destruction.

How we secure your data. Information system and data security is imperative to us to ensure that we are keeping our clients and subscribers happy.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and secure against the ever changing threat landscape.

When you trust us with your data we will always keep your information secure to maintain your confidentiality. By utilising strong encryption when your information is stored or in transit we minimise the risk of unauthorised access or disclosure; when entering information on the Site, you can check this by right clicking on the padlock icon in the address bar.

**Storage of information.** The **JASSPA** hosting operations are based in the UK and we store most of our data within the European Union (EU). Some organisations which provide services to us may transfer data outside the European Economic Area but we'll only allow this if your data is adequately protected. Some of our social media channels are provided by US companies and whilst it is our policy that we prefer data hosting and processing to remain on EU-based solutions, it may be that using their products results in data transfer to the USA. However we only allow this when we certain it will be adequately protected. (e.g. US Privacy Shield or Standard EU contractual clauses).

# V. COOKIES

Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser to enable our systems to recognise your browser and to automatically collect information from your computer such as your IP address and other details about your computer which are automatically collected by our web server, operating system and browser type and for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

The "Help" menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or visiting the website of its manufacturer

If you do leave cookies turned on, be sure to sign off when you finish using a shared computer.

Please note that our advertisers may also use cookies, over which we have no control.

The use of cookies enables us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and so allow us to customise Our Site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to Our Site.

## **VI. YOUR CHOICES**

**Email.** You will only receive emails from **JASSPA** if you have submitted an enquiry about our courses or classes. Subsequent to our email response to your enquiry, if you decide not to join our school you will either not be contact by **JASSPA** again, or we will offer you the option to be removed from further marketing communications. Please note that even if you opt-out of receiving communications from **JASSPA**, we may need to send you service-related communications, such as confirmations of any future reservations to our events.

## **VII. YOUR RIGHTS**

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing.
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- You can contact us at jasspa@jags.org.uk to request to exercise these rights at any time.

If we choose not to action your request we will explain to you the reasons for our refusal.

**Your right to withdraw consent.** Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest. In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

**Direct marketing.** You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

**Keeping your information.** We will only use and store your information for as long as it is required for the purposes it was collected for. How long it will be stored for depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

## VIII. LINKS TO OTHER WEBSITES

The Site may contain links to other websites or services that are not owned or controlled by **JASSPA**. This Policy only applies to information collected by the Site. We have no control over

these third party websites, and your use of third party websites and features are subject to privacy policies posted on those websites. We are not responsible or liable for the privacy or business practices of any third party websites linked to the Site. Your use of third parties' websites linked to the Site is at your own risk, so we encourage you to read the privacy policies of any linked third party websites when you leave one of the Site.

# IX. CHANGES TO THIS POLICY

Except to the extent limited by applicable law, we reserve the right to update this Policy to reflect changes to our information practices by prominently posting notice of the update on the Site, and as required, obtaining your consent. Any updates will become effective immediately after posting the updates to this Policy and apply to all information collected about you, or where required, upon your consent. You agree that you will review this Policy periodically. If we make any changes to this Policy, we will change the "Last Updated" date at the top. You are free to decide whether or not to accept a modified version of this Policy, but accepting this Policy, as modified, is required for you to continue using the Site. If you do not agree to the terms of this Policy or any modified version of this Policy, your sole recourse is to terminate your use of the Site.

If we make any changes to this Policy that materially impacts previously collected information about you, we will obtain your prior express consent.

# X. CONTACT US

If you have any questions about this Policy or information we have collected about you, please contact us at <u>jasspa@jags.org.uk</u>. We will aim to respond to all queries within 30 days.

**What to do if you're not happy.** In the first instance, please talk to us directly so we can resolve any problem or query. You also have the right to contact the Information Commissions Office (ICO) if you have any questions about Data Protection. You can contact them using their help line 0303 123 113 or at <u>www.ico.org.uk</u>.