

# Rambert Grades Privacy Policy

2024-25

This Privacy Policy explains how we collect, use, and store your personal information in relation to your use of this website and the services we offer. It explains what are your legal rights and how you may exercise them.

Please read this Privacy Policy as it is an important document. If anything in this Privacy Policy is unclear please contact us for further explanation.

You can write to us at the following address:

Rambert Grades, Clifton Lodge, St Margarets Drive, Twickenham, TW1 1QN United Kingdom

Or send an email to us at: support@rambertgrades.com

Our telephone number is: +44 (0)20 8892 9960



#### 1. Who we are

We are Rambert Creative Contemporary Dance Grades Ltd referred to throughout this Privacy Policy as "Rambert Grades", "we", "our", or "us".

A collaboration between two of the world's leading contemporary dance organisations, Rambert School and Rambert Dance Company, Rambert Grades is an awarding organisation recognised by The Office of Qualifications and Examinations Regulations (Ofqual).

Acknowledged as the benchmark for creative contemporary dance learning and practice, our syllabus is accessible to people from all backgrounds, working with the whole person and developing transferable skills.

Rambert Grades has links to higher education via the Rambert School of Ballet and Contemporary Dance and to the profession via Rambert Dance Company; along with access to high calibre personnel, including leading contemporary dance choreographers and an internationally recognised brand.

We offer our members comprehensive resources, support and access within the dance world include those you would expect of an international professional association: regular newsletters, online workshops, ongoing live support with monthly Member Support sessions via Zoom; marketing materials to assist in promoting schools and classes who adopt the Rambert Grades syllabus; discount schemes for publications and meetings, seminars, social functions and access to a team of dedicated staff.

We are a registered company in England and Wales under company number 11676508 and our registered office is at Clifton Lodge, St. Margarets Drive, Twickenham, TW1 1QN. United Kingdom.

For the purposes of this Policy, Rambert Grades is the data controller and we are registered with the Information Commissioner's Office under registration reference ZB627775.

# 2. Collection of Personal Information

We collect personal information about you whenever you engage with us, apply for a job with us, or use one of our services.

This includes:

- When you use our website;
- When you contact us via email, telephone or post;
- When you interact with us on social media platforms e.g., by posting a

message on one of our accounts;

- When you make a complaint;
- When you contact us to exercise one of your legal rights e.g., the right to access your personal information;
- When you apply for a job with us;
- When you attend a job interview;
- When you register to attend an event, for example a conference, trade show or training course organised or attended by us;
- When you subscribe to our newsletter;
- When you apply to become a Rambert Grades member;
- When you go through the Rambert Grades membership application process.

In addition, we may receive personal information about you from other individuals or organisations.

This includes:

- When a job applicant gives your name and contact details as a referee;
- When a referee provides information about you during the recruitment process;
- When a complainant refers to you in their complaint correspondence.

#### 3. The Personal Data we may collect about you

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes your billing address, delivery address, teaching address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you interact with and use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Special Category Data includes certain types of personal data which are considered to be particularly sensitive. For example, if you apply to become a Rambert Grades Member, or apply for a job with us, we will collect information about your teaching qualifications (which must be at least Level 4 or equivalent) and details of your criminal history (if any) and you may be required to undertake an Enhanced Disclosure and Barring Service (DBS) check to ensure that safeguarding concerns when dealing with children, young people and adults at risk are comprehensively addressed by us.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

# 4. How we use your personal information

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- Performance of a contract with you: Where we need to perform the contract we are about to enter into or have entered into with you.
- Legitimate interests: We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Legal obligation: We may use your personal data where it is necessary for

compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

• Consent: We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example, if you subscribe to an email newsletter. You may withdraw your consent at any time.

We may use your personal information to:

- Deal with your enquiries, requests or complaints;
- Send you details about forthcoming events, conferences and training courses which you have requested and which we believe may be of interest to you;
- Send you communications which you have requested to receive from us, for example when you subscribe to our newsletter;
- Process your application for Rambert Grades membership;
- Administer our membership records;
- Carry out our obligations under any contracts entered into between you and us, or to meet our legal obligations to regulators, government, and/or law enforcement bodies;
- Assess your suitability for a job you have applied for, and to progress your application through our recruitment process (please see Section 5 below for more information about our recruitment process);
- Better understand how you interact with our website, including pages you visit and areas that are of most interest to you. This is so we can improve our website, the user experience, and target our audience more effectively.

# 5. How we use your personal information during the Rambert Grades Recruitment Process

When you apply for a job with Rambert Grades, we will collect and process your personal information. We will only collect personal information that is necessary to assess your suitability for the job you have applied for, to progress your application and to keep you updated throughout the process and to comply with any legal or regulatory obligations.

We may collect personal information about you either directly from you or from a third party such as a recruitment agency.

The information we collect may include:

- Your name, address and contact details, including email address and telephone number;
- Details about your qualifications (including copies of certificates), skills, experience, and employment history;
- Details about any professional memberships you hold;
- Information gathered from any interviews or assessment centres you attend;
- Information about your current salary level, including benefits and pension entitlements;
- Information about your right to work in the UK.

In some circumstances, we may collect and process information about you which is sensitive. This may include:

- Information about your racial or ethnic origin, religious or philosophical beliefs, or sexual orientation for the purpose of our equal opportunities monitoring;
- Whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process;
- Information about criminal convictions and offences.

As part of our recruitment process, we may ask applicants to complete an equal opportunities questionnaire. This is not mandatory; it is entirely your choice as to whether you provide us with this information and there are no adverse consequences if you choose not to do so.

If you do choose to provide this information to us, we will not make it available to any employees outside of our recruitment team in a way that can identify you.

We will use this information to produce and monitor equal opportunities statistics.

If your application for employment is unsuccessful, we will retain your personal information for 6 months. At the end of that period, your personal information will be deleted or securely destroyed, unless we need to retain it for longer to exercise or defend any legal claims, or you have agreed that we can retain your details in our talent pool for a period of 12 months, should any suitable vacancies become available during that time.

If your application for employment is successful, any personal information gathered during the recruitment process will be transferred to your employee file and retained for the duration of your employment with us, plus a period of 6 years following the end of your employment.

When an offer of employment is made to you, we will be required to undertake preemployment checks. For example, we may collect personal information about you from third parties, such as references from current or former employers and information from background check providers,. We will only seek this information once an offer of employment has been made to you and we will always tell you before we do this.

Once the necessary pre-employment checks have been completed, and the outcomes are satisfactory, we will collect and process additional personal information relating to your employment.

This includes:

- Your bank or building society details, so we can process your salary;
- Your emergency contact details, so we know who to contact in the event of an emergency at work.

You are under no statutory or contractual obligation to provide your personal information to us during the recruitment process. However, if you do not provide this information, we may not be able to process your application properly or at all or provide any reasonable adjustments during the recruitment process.

# 6. With whom we share your personal information

We will only share your personal information with other organisations where it is lawful for us to do so. When we share your personal information, we will only share the information that is necessary. We will always share information securely and use our best efforts to ensure that we are giving it to the right recipient.

We may share your personal information with third parties in the following circumstances:

- Where we are obliged to do so in order to comply with a legal or regulatory obligation. For example, we are legally required to provide information about employee income tax contributions to HMRC;
- In an emergency;
- Where we are required to do so to comply with the instructions of a law enforcement authority;
- To protect our business interests.

We may also share your personal information with third parties who provide a service to us.

When we use third parties to process personal information on our behalf, they are required to follow the same rules and information security requirements as we do and they are not permitted to reuse your personal information for any other purpose. We only share the personal information that is necessary to deliver the applicable

service.

We will not share your personal information with third parties for marketing purposes and we will never license or sell your personal information to any other organisation or individual.

#### 7. How we secure your personal information

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and the Information Commissioner's Office of any breach within the specified timescales where we are legally required to do so.

# 8. For how long we retain your personal information

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data. Please see section 11 below.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

# 9. Marketing

We will keep you up to date with our latest news and details about any upcoming events, conferences or training courses if you have told us that you wish to receive marketing communications from us.

If you decide that you no longer wish to receive such materials from us, you can optout at any time by contacting us using the contact details contained in this Privacy Policy or by clicking on the 'unsubscribe' link contained in any email marketing communication you receive from us.

# 10. Links to Third Party Websites

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

# 11. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (please see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object at any time to the processing of your personal data for direct marketing purposes;

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;
- Withdraw consent at any time where we are relying on consent to process your personal data.. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent;
- Request restriction of processing of your personal data.

This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:

- If you want us to establish the data's accuracy;
- Where our use of the data is unlawful but you do not want us to erase it;
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us by email to support@rambertgrades.com

# 12. Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. If you wish to exercise any of the rights outlined in this Privacy Policy, please write to us at the following address:

Rambert Grades, Clifton Lodge, St Margarets Drive, Twickenham, TW1 1QN United Kingdom

or send an email to us at: support@rambertgrades.com

We will endeavour to respond to all requests without delay and in any event within one month of receiving your request. There may be circumstances when we need to extend the time limit for responding to a request. We will tell you if this is the case and keep you informed.

Before responding to a request, we may be required to ask for further information and/or proof of your identity.

# 13. Changes to this Privacy Policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

We keep this privacy policy under regular review. The policy was last updated in August 2024.

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Date Reviewed	
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