



[www.elmazproductions.com](http://www.elmazproductions.com)  
elmazproductions@gmail.com

## **Data Policy**

### **1. Obligation to comply**

1.1 Elmaz Productions is obliged to comply with the EU General Data Protection Regulation (GDPR) and Data protection Act 2018 with regards to collection of emergency phone numbers, email addresses, any medical details and bank details and with regards to taking or publishing of photographs of children during workshops, classes or any other undertaking run by Elmaz Productions. Elmaz Productions will always try to act in the best interest of the students and, as far as it legally can, it will take parental preference into account where appropriate. This is also with regards to collection of data from team members, Teaching Assistants and/or volunteers working on behalf of Elmaz Productions. This includes collection of bank details, home address, DBS checks, and photographs.

### **2. The Rights of the Child**

2.1 The new data protection legislation gives children rights over their own data when they are considered to have adequate capacity to understand. Most children will reach this level of understanding at around age 12. This means some children Elmaz Productions work with will not be considered to have adequate capacity to understand.

### **3. Parental preference**

3.1 Where Elmaz Productions considers that the child does not have the capacity or understanding to make such a decision, Elmaz Productions will act as it considers to be in the best interest of the child, and in doing so will take into account any stated parental preference.

3.2 In order to do this Elmaz Productions will need to ask parents or carers to express a preference with regards to the taking of photographs or filming. Parents or carers will be asked to give their consent, through Elmaz Productions, to use these photographs or videos. Parents and Carers can ask Elmaz Productions to remove photographs or videos of their child at any time.

### **4. Use of photographs and media**

4.1 Photographs and media may be used for promotional purposes these include:

- Photographs on the Elmaz Productions website.
- Photographs and media published on social media sites such as Twitter, Facebook and Instagram sites. Such sites can be accessed by the public and will therefore require monitoring.
- Photographs on promotional material which can include business cards, leaflets, flyers, posters and banners.

## **ELMAZ PRODUCTIONS LTD**

Registered Company (England and Wales): 13346673  
34 Lapwing Lane, Cholsey, Wallingford OX10 9QS



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4.2 Elmaz Productions will not name the children in the photographs.

4.3 Where consent is requested as explained in paragraph 3.2 it must be in line with GDPR e.g freely given, specific, informed, unambiguous, verifiable and properly documented.

4.4 In each case Elmaz Productions will need to show that it has justification for sharing the data and that it has considered any safeguarding risks attached to such publications.

## **5. Use of Personal Data**

5.1 Personal data may be collected from parents/carers and workers. The personal data Elmaz Productions collects is as follows:

- For parents and carers, if your child attends workshops or classes, Elmaz Productions will ask for an emergency phone number, email address and any relevant medical details. This is to ensure the safety of your child.

- On the rare occasion, and for refund purposes only, Elmaz Productions may ask for bank details from parents or carers.

- Elmaz Productions asks for a contact email when booking.

- For workers, Elmaz Productions asks for a home address, bank details, DBS. These are for teaching assistants administration and payment purposes.

5.2 Personal Data collected may be shared with company directors/workers within Elmaz Productions. Company directors may print out hard copies of personal data for their registers. These include emergency phone numbers, children's names and emergency medical details.

5.3 Any hard copy personal data must be properly and securely disposed of when the data is no longer being used.

5.4 Personal data kept online can be kept indefinitely and may be used by Elmaz Productions for advertising purposes.

5.5 Any individual or organisation reserves the right to access and correct the information that Elmaz Productions holds about them or to have it removed.

5.6 Personal data is processed for the purposes of: team members (teaching assistants / volunteers) administration, advertising, marketing and PR. All aspects of personal data use are directly related to Elmaz Productions business activities, accounts and record-keeping.

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