



Grove Studios · Robyn Academy · Taboo Dance Company
37 The Grove, Gravesend, Kent DA12 1DX

DATA PROTECTION (UK-GDPR) POLICY

Date Adopted: July 2026

Next Review: July 2027

Organisation: Grove Studios

Data Controller / DPO

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Date Adopted

14 March 2024 (Updated July 2026)

Next Review

July 2027

Legislative Basis

Data Protection Act 2018 · UK-GDPR

Purpose

The Grove Studios is committed to ensuring that all data we process remains safe and secure. This policy is written in line with the Data Protection Act (2018) and the UK's General Data Protection Regulation (UK-GDPR). The Grove Studios is registered as a Data Controller with the Information Commissioner's Office (ICO).

Lawful Bases for Processing

- Legal obligation — UK-GDPR Article 6(1)(c)
- Legitimate interest — UK-GDPR Article 6(1)(f)
- Contract — UK-GDPR Article 6(1)(b)
- Explicit consent (special category data) — UK-GDPR Article 9(a)

Data Collected — Participants

Personal data: full name, date of birth, home address, sex, school, exam results, classes attended, permission to go home alone.

Special category (consent required): medical/disability information, ethnicity, gender, sexuality.

Parent/guardian: name, address, email, mobile, work/home number, emergency contact.

Retention — Participants

Standard retention: 3 years post final attendance. Exceptions:

- Financial records: 6 years (legal obligation)
- First aid records: 3 years (legal obligation)
- Safeguarding records: indefinitely (minimum 6 years)
- Photo consent: indefinitely
- Bank details: deleted after action complete

Retention — Staff

Most staff data: 6 years post-employment. Exceptions:

- Pension details: 75 years (legal obligation)
- Safeguarding records: indefinitely (minimum 6 years)
- First aid records: minimum 3 years
- Unsuccessful applicants: 6 months post campaign

Third Parties

- LoveAdmin — email newsletters (consent at enrolment; opt-out available at any time)
- PayPal — online booking payment processing
- Starling Bank — staff BACS payments
- HMRC — PAYE legal obligation
- Examination boards — ISTD, IDTA, RAD, BTDA, Trinity College (consent sought at entry)
- Local councils — child performance licensing and safeguarding referrals only
- Schools — name, DOB and payment info for internal classes only

Data is never sold. Third-party sharing is always consensual and only with UK-GDPR compliant organisations. Freelance teachers receive first names and relevant medical information only.

Your Rights

All requests responded to within one month. You have the right to:

- Access — request a copy of all data held about you/your child
- Rectification — correct inaccurate data
- Erasure — request deletion (does not apply to legal obligations)
- Restrict processing — note: may require suspension of membership for H&S / safeguarding reasons
- Data portability — obtain your data to reuse elsewhere
- Objection — object to processing (legal obligations may override)
- Object to automated decision-making — no decisions are automated at The Grove Studios

Complaints & Data Breaches

Complaints regarding data handling should be directed to the DPO: Jacqueline Hadlow-Moore, jacqueline@robynacademy.com, +44 7310 265402.

If unresolved, escalate to the ICO: ico.org.uk | 0303 123 1113

Data breaches are reported to the ICO within 72 hours. Affected individuals are notified as soon as possible where there is a high risk to their rights and freedoms.