



RSM STAGE ACADEMY
 UNIT 6D
 WEDNESFIELD BUSINESS PARK
 WOLVERHAMPTON
 WEST MIDLANDS
 WV11 3SF

T: 01902 725100 / M: 07583 849316 /
 E: INFO@RSMSTAGEACADEMY.CO.UK

Policy: DATA PROTECTION (GDPR)		
Date Adopted: 28/07/2020	Date of last review: June 2018	To be reviewed next before/on: 27/07/2022
2008 (DPA) Updated 2018 (GDPR)		
<p>Purpose and Statement: RSM Stage Academy is committed to ensuring the data processed by our school remains safe and secure.</p> <p>This policy has been written in line with legislative change, including both the Data Protection Act (1998) and the EU's General Data Protection Regulation (GDPR).</p> <p>RSM Stage Academy has determined the lawful reasons with which it processes personal data:</p> <ul style="list-style-type: none"> • Legal obligation – GDPR Article 6(1)(c) • Legitimate interest – GDPR Article 6(1)(f) • Contract - GDPR Article 6(1)(b) <p>There is also some limited data we process with consent from the Data Subject; Consent – GDPR Article 6(1)(a).</p> <p>While RSM Stage Academy avoids sharing data with third parties at most times, some data is shared in accordance with our business practices. The sharing of data with third parties will always be consensual with the data subject and with the student/performer or parent/guardian, and only if RSM Stage Academy is satisfied that their Data Protection policy is GDPR compliant.</p> <p>Main Aims for the policy:</p> <ul style="list-style-type: none"> - Specify the data RSM Stage Academy collect, how it is stored/protected and the reason for collecting it - State how RSM Stage Academy use personal data in processing - Disclose who has access to the data and how long we retain information for - Explain Data Subject's rights with RSM Stage Academy data including access, rectification and erasure 		



Distribution:

- To be distributed to Board at AGM and Induction sessions for Board Members [IF APPROPRIATE]
- To be sent to all staff, freelance staff and volunteers as part of induction and training
- To be displayed on the **RSM Stage Academy** website
- This policy will be sent directly to members of the public on request
- Confirmation of receipt of information - Signed statement from recipient to be held on file

Review and monitoring of policy:

- Reviewed every 24 months or in instances of legislative change
- Monitoring is part of Management and Supervision

The following policy is based on the below principles:

The GDPR includes the following rights for individuals:

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object
- the right not to be subject to automated decision-making including profiling

General Principles

RSM Stage Academy is committed to providing fair and understandable privacy policies in relation to personal data.

RSM Stage Academy will, at all times, keep data in secure locations (including, but not limited to, encrypted and access restricted files) and not retain data unnecessarily or past the retention length as set out in this policy.

In the rare instance a data processor that is not an **RSM Stage Academy** employee is used, such as a third party, the data subject will either be asked for consent pre to supplying the data or be notified and have the right to object to processing.

Participants and Customers

How RSM Stage Academy collect personal data:

RSM Stage Academy [customers and participants supply their personal data when signing up for classes through our registration form either via the website, or via paper form.

This is either completed by a parent/guardian or the student/client themselves if they are over the age of 18. Personal data may also come to us unsolicited via enquiries through our website and to our generic email account.

Why RSM Stage Academy collect personal data:

To attend any of **RSM Stage Academy's** activities participants/parents/guardians must agree to some processing of their personal data. This is due to Legitimate Interests – GDPR Article 6(1)(f), Legal Obligation GDPR Article 6(1)(c), Contract - Article 6(1)(b) and/or Consent - Article 6(1)(a).

Should **RSM Stage Academy** be unable to process participant's data, we would be contravening both our Health & Safety and Child Safeguarding policies. We would also be ignoring best practice regarding working with children/vulnerable adults.

Our participants must remain safe at all times, therefore information about participants must be collected in order to create registers and accurate student records. This information is also used to provide students with appropriate classes, including dividing students into age groups.

Special category data is only collected with the consent of the data subject. Special category data **RSM Stage Academy** collects includes but is not limited to: Medical/Disability information, Income information, Ethnicity, Gender and Sexuality.

As physical activity providers it is essential that this consent is given should a participant have any medical/disability needs. This allows us to incorporate participants safely into classes. It is also used in assessing if we can incorporate participants safely into classes.

Income information is only collected in instances where a participant applies to attend our classes at a concessionary price, or on a bursary. This financial support is means tested, and therefore is subject to documented proof. Proofs of entitlement to concession are shredded after the entitlement has been noted.

Ethnicity and other sensitive data is to provide information to funding bodies for statistical purposes. This data is always provided to third parties as quantified data (i.e. cumulative numerical data only with no identifying information relating to any data subject).

What data we collect:

Personal data and some special category is collected.

It is essential to our primary function (providing classes to participants) that we are provided, and allowed to process and store the following:

Participant Personal Data:

- Full Name - GDPR Article 6(1)(f)
- Date of Birth - GDPR Article 6(1)(f)
- Home Address - GDPR Article 6(1)(f)
- Sex - GDPR Article 6(1)(f)
- Permission to go home alone - GDPR Article 6(1)(f)
- School/Educational Institution - GDPR Article 6(1)(f)
- Exam results (vocational exams taken through **RSM Stage Academy** only) - GDPR Article 6(1)(f)
- Classes attended/Price paid - GDPR Article 6(1)(f)

Participant Special Category Data:

- Medical Information/History – GDPR Article 9 (a)
- Disability Information - GDPR Article 9 (a)
- Ethnicity – GDPR Article 9 (a & j) – further explicate consent sought
- Gender/Sex – GDPR Article 9 (a & j) – further explicate consent sought
- Sexuality – GDPR Article 9 (a & j) – further explicate consent sought

Parent/Guardian Personal Data:

- Name - GDPR Article 6(1)(f)
- Address - GDPR Article 6(1)(f)
- Email Address - GDPR Article 6(1)(f)
- Mobile Telephone Number - GDPR Article 6(1)(f)
- Work/Home Number - GDPR Article 6(1)(f)
- Emergency Contact Number - GDPR Article 6(1)(f)

Parent/Guardian Special Category Data:

- Concession Type – further explicate consent sought
- Documented proof of financial need – further explicate consent sought
- Bank Details – further explicate consent sought in the instance of refunds etc.

How data collected is sent internally:

RSM Stage Academy transports data with all due diligence.

Enrolment forms are sent to **RSM Stage Academy** through an encrypted email server directly from our website which has controlled access. Received **enrolment forms** are stored on an encrypted email server for no more than 6 months. Received paper **enrolment forms** are destroyed after no more than 6 weeks.

Application forms are to be completed either online via our website or in person at the academy. Received **application forms** are embedded onto our online system **Membermeister** within 48 hours of receiving the completed documents. Received paper **application forms** are stored away in a lockable filing system where only Principal and senior members of staff are permitted access.

Storage/Retention of data:

Data received through enrolment forms is uploaded manually into our database software. Our database is stored both in encrypted files on office-based hardware and backed up regularly in our encrypted cloud-based server. Access to these files is restricted through password protection and only available to authorised staff members.

Registers and emergency contact lists created from student data are stored in encrypted files on office-based hardware and backed up regularly in our encrypted cloud-based server. Access to these files is restricted through password protection and only available to authorised staff members. Hard copies of registers and emergency contacts are carried by authorised staff members. They are locked away while not in use. When they are no longer in use or out-dated, they are destroyed thoroughly.



Waiting lists are stored on an encrypted cloud-based server.

Our standard retention policy (without the data subject's right to access, rectification and erasure etc.) is THREE YEARS post final attendance.

Exceptions to our retention policy:

- Financial records are kept for 6 years due to legal obligation
- First Aid records are kept for 21 years due to legal obligation
- Photo consent may be kept indefinitely
- Child Safeguarding records are kept indefinitely on a case-by-case basis, the minimum these will stored for is 6 years due to legal obligation
- Bank details are deleted after the action concerning them is complete
- Unsolicited enquiries that do not turn into bookings with current classes are deleted after they have been dealt with

Third Parties/Data Processors:

RSM Stage Academy does not actively share data with third parties, however there are certain instances where sharing information is crucial to our business processes.

Freelance Teachers:

As many of **RSM Stage Academy** teachers are freelance staff, we have confidentiality and data processor agreements in place. Teachers will never be provided with personal details aside from participant's first names and any medical information that is pertinent to the running of a class (subject to consent from the data subject)

Membermeister:

RSM Stage Academy uses online software program **Membermeister** to provide newsletters and email updates to new and existing parents, guardians and students of the academy. Invoices, scripts, song lyrics, general academy work, texts and reminders are also sent using **Membermeister**.

RSM Stage Academy is satisfied that their GDPR regulations are thorough, and the information stored in **Membermeister** is fully secure.

Online Shop/Payments

RSM Stage Academy uses stripe through their online shop to process orders through our website. By purchasing through the website you must agree to their own (GDPR Compliant) policies.

RSM Stage Academy is satisfied that their GDPR regulations are thorough, and any information stored is secure. Payments are also made in person and over the phone at the **RSM Stage Academy** via our card machine, but no personal data is stored once their details are entered and the transaction is complete.

Child Performance Licensing:

In order to process child performance licences, **RSM Stage Academy** are legally required to provide some personal data to local councils (including but not limited to: full name, date of birth and school details). This is an optional consent, which will be sought at the time of sending participation consent forms.

RSM Stage Academy is satisfied that their GDPR process are thorough and any data will be stored in a secure environment, and not unnecessarily retained. For more information:
<https://www.lewisham.gov.uk/mayorandcouncil/aboutthecouncil/access-to-information/Pages/Data-Protection-Act.aspx>

Child Safeguarding Concerns:

In the unlikely event **RSM Stage Academy** has a safeguarding concern in relation to one of our participants, **RSM Stage Academy** are legally required to provide data to the safeguarding board at the local council. **RSM Stage Academy** is satisfied that their GDPR process are thorough and any data will be stored in a secure environment, and not unnecessarily retained.

Event Programmes:

RSM Stage Academy may occasionally produce programmes for events. These will only ever contain the first name and surname of a student and/or client. The name of a student's/client's class may also be included. Names are automatically included in show or event programmes, unless otherwise stated by that parent or guardian or adult performer themselves.

Examination Entry:

In order to enter examinations, must provide some personal data to examination boards (currently **RSM Stage Academy** work with Trinity College London and NATD). This sharing of data is to be consented to by the data subject and/or parent/guardian or client upon being entered for the exam.

Independent Examiner:

It is **RSM Stage Academy's** legal obligation to have an independent examination with regards to its financial processes at the end of every financial year. This includes access to our income relating to classes and services. Any data shared will be purged of as much identifying data as possible.

RSM Stage Academy is satisfied that their GDPR process are thorough and any data will be stored in a secure environment, and not unnecessarily retained. **RSM Stage Academy** has a copy of the privacy agreement on file.

Rights of the data subject and RSM Stage Academy compliance with responses:

Any data subject with personal data stored within **RSM Stage Academy** is entitled to the rights of:

- **Access**

You may contact **RSM Stage Academy** at any time to access all data held relating to you and/or your child(ren). **RSM Stage Academy** will ensure that we respond to a subject access request without undue delay and within one month of receipt. If the information request will also include data regarding others, **RSM Stage Academy** has the right to refuse the request or take steps in order to obtain consent from other involved parties.

The right of access does not apply to **RSM Stage Academy's** legal obligations such as Safeguarding records.



- **Rectification**

You may contact **RSM Stage Academy** at any time in order to rectify data held relating to you and/or your child(ren). **RSM Stage Academy** will ensure that we respond to a rectification request without undue delay and within one month of receipt.

The right to rectification does not apply to **RSM Stage Academy** legal obligations such as payment record information.

- **Erasure**

You may contact **RSM Stage Academy** at any time in order to erase data held relating to you and/or your child(ren). **RSM Stage Academy** will ensure that we respond to an erasure request without undue delay and within one month of receipt.

The right to erasure does not apply to **RSM Stage Academy** legal obligations such as First Aid records.

- **Restrict Processing**

You may contact **RSM Stage Academy** at any time in order to restrict the data we process relating to you and/or your child(ren). **RSM Stage Academy** will ensure that we respond to a request to restrict processing without undue delay and within one month of receipt.

However, due to our legitimate interest in most of the data collected- we may have to revoke your place with **RSM Stage Academy** until the restriction is lifted. This is due to Health and Safety and Child Safeguarding.

- **Data Portability**

You may contact **RSM Stage Academy** at any time in order to obtain the data we process relating to you and/or your child(ren) and reuse it across different services. **RSM Stage Academy** will ensure that we respond to a request to restrict processing without undue delay and within one month of receipt. Please note, this does not apply to **RSM Stage Academy's** legal obligations.

- **Objection**

You may contact **RSM Stage Academy** at any time in order to object to the processing of data relating to you and/or your child(ren). **RSM Stage Academy** will ensure that we respond to a request to restrict processing without undue delay and within one month of receipt.

However, due to our legitimate interest in most of the data collected- we may have to revoke your place with **RSM Stage Academy** until the restriction is lifted. This is due to Health and Safety and Child Safeguarding.

- **Rights related to automated decision-making including profiling**

You may contact **RSM Stage Academy** at any time in order to object to profiling relating to you and/or your child(ren). **RSM Stage Academy** will ensure that we respond to a request to restrict processing without undue delay and within one month of receipt.

However, due to our legitimate interest in most of the data collected- we may have to revoke your place with **RSM Stage Academy** until the profiling restriction is lifted. This is due to Health and Safety and Child Safeguarding.

RSM Stage Academy has a lawful reason for profiling; Legitimate Interests and consent. None of **RSM Stage Academy's** decision making is automated. Profiling is only used in circumstances where a participant may have certain health/disability needs which may prevent them from taking part in classes (as it would be unsafe to do so).

Any and all verbal requests are noted, and then contacted again either via phone or email to verify the request. Verbal requests will be responded to in the time frames mentioned above.

Photos/Videos of Participants

RSM Stage Academy often use footage/photos used from shows, performances and classes for marketing purposes both in print media and the website. Participants/their Parent and/or Guardians may choose if they do not wish themselves/their child to be depicted.

Some attendees at events may film/take photos for their own personal use (e.g. parents of other participants). Participants/their Parent and/or Guardians may choose if they do not wish themselves/their child to be depicted.

Social Media:

RSM Stage Academy regularly share photos/videos of students in workshops, events and performances through social media platforms including; Instagram, Facebook, Twitter, Email. These will never be shared with any identifying information (age, location etc.). There may be times where we will share their names, but only with the explicit consent of the parents.

Staff (Employees/Freelance), Trustees, Volunteers and Potential Staff/Trustees and/or Volunteers

For the purposes of this policy, the aforementioned persons above will be referred to as 'staff'.

How RSM Stage Academy collect personal data:

RSM Stage Academy staff supply their personal data when applying for roles within the company.

This is either completed through an application form or submission of a CV.

Further information is collected when applicants are considered successful. Unsolicited data may come to

RSM Stage Academy in the form of applicants emailing regarding work/volunteer opportunities.

Why RSM Stage Academy collect personal data:

It is **RSM Stage Academy's** legal obligation to collect staff's personal data in relation to their employment.

This is due to Legal Obligation GDPR Article 6(1)(c) and/or Contract - Article 6(1)(b)

Should **RSM Stage Academy** be unable to process staff's data, we would be contravening UK Employment law, our own employment contracts (both PAYE and Freelance) and our own Health & Safety and Child Safeguarding policies.

Special category data is only collected with the consent of the data subject. Special category data **RSM Stage Academy** collects includes but is not limited to: Medical/Disability information, Ethnicity, Gender and Sexuality. **RSM Stage Academy's** lawful purpose for collecting this data is both Article 6(1)(b) – contract and Article 9(2)(b) – employment. This also ensures we are confirming to our Equal Opportunities policy. Any data is always recorded as quantified data (i.e. cumulative numerical data only with no identifying information relating to any data subject).

RSM Stage Academy is also entitled to obtain and process data in relation to criminal convictions and DBS checks. Most posts within **RSM Stage Academy** are exempt from the Rehabilitation of offender's act (1974) by the 1975 and 2001 Exceptions Amendment, as they involve working with vulnerable and/or young people. This is further supported by article 10 of GDPR.

What data we collect:

Personal data and some special category is collected.

It is essential to our business that we are provided, and allowed to process and store the following:

Staff Personal Data:

- Full Name Legal obligation – GDPR Article 6(1)(c) Legal Obligation
- Date of Birth - GDPR Article 6(1)(c) Legal Obligation
- Contact Details - GDPR Article 6(1)(c) Legal Obligation
- Pension Information - GDPR Article 6(1)(c) Legal Obligation
- NI number - GDPR Article 6(1)(c) Legal Obligation
- UTR number - GDPR Article 6(1)(c) Legal Obligation
- Right to work in the UK - GDPR Article 6(1)(c) Legal Obligation
- References - GDPR Article 6(1)(c) Legal Obligation
- Bank Details - Article 6(1)(b) Contract
- Tax details - GDPR Article 6(1)(c) Legal Obligation
- Qualifications - Article 6(1)(b) Contract
- Pay Details - GDPR Article 6(1)(c) Legal Obligation
- Performance Details - Article 6(1)(b) Contract
- Annual Leave Details - Article 6(1)(b) Contract
- Sick/Compassionate/Maternity/Paternity Leave Details - Article 6(1)(b) Contract
- Safeguarding Concerns - GDPR Article 6(1)(c) Legal Obligation
- Emergency Contact - GDPR Article 6(1)(b) Contract
-

Staff Special Category Data:

- Criminal Record/DBS Checks - GDPR Article 6(1)(c) Legal Obligation & GDPR Article 10
- Medical/Disability - Article 6(2)(b) Contract & Article 9(2)(b)
- Ethnicity – Further explicit consent sought- Article 9(2)(a & b)
- Sexuality – Further explicit consent sought - Article 9(2)(a & b)

How data is sent internally:

Any transfer of data regarding staff is conducted through encrypted emails and/or stored in our encrypted cloud-based server.

Any unsolicited information is received to an encrypted email server.

Storage/Retention of data:

All Staff personal data is stored on encrypted files in our cloud-based server. It is also stored on encrypted hardware within the office. Any hard copies are stored in a locked cabinet. All of these files have restricted access to authorised staff only.

Most staff data is retained for 6 YEARS (post-employment).

Exceptions to our retention policy:

- Pension details are stored for 75 years (post-employment) due to legal obligation
- Child Safeguarding records are kept indefinitely on a case-by-case basis, the minimum these will stored for is 6 years due to legal obligation
- First Aid records are kept for a minimum of 21 years due to legal obligation

Unsuccessful applicant data is stored 6-months post campaign, this includes unsolicited data from potential applicants.

Third Parties/Data Processors:

RSM Stage Academy does not actively share data with third parties, however there are certain instances where sharing information is crucial to our business processes.

Staff Payments:

In order to process payments by BACs, staff's bank details and names must be added to our online banking system. **RSM Stage Academy** is satisfied that their GDPR process are thorough and any data will be stored in a secure environment, and not unnecessarily retained.

HMRC:

In order to fulfil our legal obligations to HMRC, **RSM Stage Academy** must supply PAYE staff's personal data each month and at the end of every financial year. All self-employed staff and teachers must supply their UTR number upon accepting their position at **RSM Stage Academy** and confirm that they are registered as self-employed. **RSM Stage Academy** is satisfied that their GDPR process are thorough and any data will be stored in a secure environment, and not unnecessarily retained.

References:

In order to supply references for staff members, some personal data must be divulged. This will only be done with the data subject's consent, as **RSM Stage Academy** may not be fully aware of the recipients GDPR policies.

Child Performance Licensing:

In order to process child performance licences, **RSM Stage Academy** are legally required to provide some staff's personal data to local councils (including but not limited to: full name and DBS details).

RSM Stage Academy is satisfied that their GDPR process are thorough and any data will be stored in a secure environment, and not unnecessarily retained. For more information:

<https://www.lewisham.gov.uk/mayorandcouncil/aboutthecouncil/access-to-information/Pages/Data-Protection-Act.aspx>

Child Safeguarding Concerns:

In the unlikely event **RSM Stage Academy** has a safeguarding concern in relation to one of the participants and/or staff members, **RSM Stage Academy** are legally required to provide data to the safeguarding board at the local council and the Disclosure and Barring service.

RSM Stage Academy is satisfied that their GDPR process are thorough and any data will be stored in a secure environment, and not unnecessarily retained.

Website Biography:

RSM Stage Academy's website includes staff biographies, these are available for public viewing. Consent is sought before any/all staff profiles are added to the website.

Independent Examiner:

It is **RSM Stage Academy's** Legal Obligation to have an independent examination with regards to its financial processes at the end of every financial year. This includes access to our Payroll records.

RSM Stage Academy is satisfied that their GDPR process are thorough and any data will be stored in a secure environment, and not unnecessarily retained. **RSM Stage Academy** has a copy of the privacy agreement on file.

Rights of the data subject and RSM Stage Academy compliance with responses:

Any data subject with personal data stored within **RSM Stage Academy** entitled to the rights of:

- **Access**

You may contact **RSM Stage Academy** at any time to access all data held relating to you.

RSM Stage Academy will ensure that we respond to a subject access request without undue delay and within one month of receipt. If the information request will also include data regarding others, **RSM Stage Academy** has the right to refuse the request or take steps in order to obtain consent from other involved parties.

The right of access does not apply to **RSM Stage Academy's** legal obligations such as confidential Child Safeguarding records.

- **Rectification**

You may contact **RSM Stage Academy** at any time in order to rectify data held relating to you.

- **RSM Stage Academy** will ensure that we respond to a rectification request without undue delay and within one month of receipt.

The right to rectification does not apply to **RSM Stage Academy's** legal obligations such as payment record information.



- **Erasure**
You may contact **RSM Stage Academy** at any time in order to erase data held relating to you. **RSM Stage Academy** will ensure that we respond to an erasure request without undue delay and within one month of receipt.
The right to erasure does not apply to **RSM Stage Academy's** legal obligations such as First Aid records.
- **Restrict Processing**
You may contact **RSM Stage Academy** at any time in order to restrict the data we process relating to you. **RSM Stage Academy** will ensure that we respond to a request to restrict processing without undue delay and within one month of receipt.
However, due to our legitimate interest and legal obligations in most of the data collected- we may not be able to restrict processing.
- **Data Portability**
You may contact **RSM Stage Academy** at any time in order to obtain the data we process relating to you and reuse it across different services. **RSM Stage Academy** will ensure that we respond to a request to restrict processing without undue delay and within one month of receipt.
Please note, this does not apply to **RSM Stage Academy's** legal obligations.
- **Objection**
You may contact **RSM Stage Academy** at any time in order to object to the processing of data relating to you. **RSM Stage Academy** will ensure that we respond to a request to restrict processing without undue delay and within one month of receipt.
However, due to our legitimate interest and legal obligations in most of the data collected- we may not be able to accept your objection.
- **Rights related to automated decision making including profiling**
You may contact **RSM Stage Academy** at any time in order to object to profiling relating to you). **RSM Stage Academy** will ensure that we respond to a request to restrict processing without undue delay and within one month of receipt.
Please note, this does not apply to **RSM Stage Academy's** legal obligations.
RSM Stage Academy has a lawful reason for profiling; Legitimate Interests and consent.
None of **RSM Stage Academy's** decision making is automated. Profiling is only used in circumstances where a staff member has a criminal conviction.

Any and all verbal requests are noted, and then contacted again either via phone or email to verify the request. Verbal requests will be responded to in the time frames mentioned above.

Training and Data Protection in Practice

All members of staff (PAYE, Freelance and Voluntary) must agree to this Data Protection policy prior to accepting a contract of employment.

Training is supplied as part of management and supervision. It is also included in all induction and training periods.



RSM Stage Academy is registered as a Data Controller with the Independent Commissioners Office (ICO). The registered Data Protection Officer (DPO) is PRINCIPAL/CREATIVE DIRECTOR, RICHARD S. MEREDITH.

Complaints and Data Breches

Complaints:

Complaints in regard to the handling of any personal data can be made directly to **RSM Stage Academy**

DPO: PRINCIPAL/CREATIVE DIRECTOR – RICHARD S. MEREDITH

Email: info@rsmstageacademy.co.uk

Telephone: 01902 725100 / 07583 849316

Address:

RSM Stage Academy

Unit 6D – Wednesfield Business Park

Waddens Brook Lane

Wolverhampton

West Midlands

WV11 3SF

If you feel that your complaint was not handled in the correct manner, or still have concerns, you may escalate the complaint by contacting the Independent Commissioner's Office (ICO).

ICO Telephone Number: 0303 123 1113

Data Breches:

If **RSM Stage Academy** experiences a data breach of any kind, we have a legal obligation to report this to ICO within 72 hours. The data breach will be reported by the DPO. In the instance they are unavailable to report the breach, the next most senior staff member shall do so.

RSM Stage Academy will also inform all the victims of the data breach as soon as possible if there is a high risk of adversely affecting individuals' rights and freedoms.

RSM Stage Academy will store and record all data breaches.