

Introduction

This is the dBs Berlin privacy policy.

dBs Berlin respect your privacy and handles personal data with great care. This policy will inform you about how we care for your personal data when you visit our website (from anywhere in the world) and inform you about your rights and how the law protects your personal information.

This privacy policy has been made in a linked format so you can click through to relevant areas of your interest.

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1. Who are dBs Berlin - the important stuff

This privacy policy gives you information on how dBs Berlin collects and processes your personal data through your use of this website. This includes any data you might provide to us directly by signing up to our newsletter, filling out a contact us form, registering to attend an Open Day, applying to one of our courses, filling out a form to be recorded by us, applying for a job with us, or generally using this website.

This website is not intended for children (you must be at least 18 to join one of our courses) and we do not knowingly collect data relating to children. If someone under the age of 17 would like to apply for one of our courses in advance, a parent or guardian must fill out the application form for them

In order to inform yourself about how and why we are using your data, it is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we collect or will process personal data about you. This privacy policy supplements any other notices and is not intended to override them.

Controller

dBs Berlin is the controller and responsible for your personal data (collectively referred to as ["dBs Berlin"], "we", "us", or "our" in this privacy policy).

The responsibilities of data protection are help by our data privacy managers. They are responsible for overseeing questions that relate to this privacy notice. If you would like to get in touch about anything such as general questions or requests to exercise your legal rights, please contact the data privacy managers using the details set out below.

Contact details

Company name: dBs Berlin GmbH

Title: Admissions & Student Admin

E-mail: admissions[at]dbsberlin[dot]net,

Address: Nalepastraße 18, 12459 Berlin, Germany

Telephone: +49 30 2900 9052

Publishing the privacy policy and the user's duty to inform us of changes

Our Website Terms and Conditions of Use was last updated on July 11, 2017 and can be found [here](#).

Data protection laws are changing on May 25, 2018 and this privacy policy intends to inform you of the rights you have under these new laws. We are a small but growing organisation and are working as fast as we can towards getting our systems ready for these changes. We appreciate your patience if we are not yet able to respond to some of your requests.

It is important that the personal data we hold about you is accurate and up-to-date. Please tell us if your personal data has changed during your relationship with us.

Third party links

This website may contain links to external website. Clicking those links might allow third parties to collect or share data about you. We are not responsible for the content or privacy practices associated with linked websites. When you leave our website, we encourage being aware of the privacy policies on the websites you are using.

2. The personal data we collect from you

Personal data as defined in the GDPR (General Data Protection Regulation 2016) is defined as “Any information related to a natural person or ‘Data Subject’, that can be used to directly or indirectly identify the person.” It does not include anonymous data.

We may collect, use, store and transfer different kinds of personal data about you which can include the following:

- **Identity data:** first name, last name, date of birth, gender, emergency contact name, emergency contact relationship to you, your passport country/countries, proof of your academic qualifications
- **Contact data:** physical address, email address, telephone number, emergency contact telephone number
- **Financial data:** bank account number, payment card details
- **Transaction data:** details about payments from you to us
- **Technical data:** IP address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, other technology on the devices you use to access this website
- **Profile data:** your engagement with the content we have sent you or that you have visited on this website, as well as your interests, preferences, feedback and survey responses
- **Usage data:** information about how you use this website and our services
- **Marketing and communications data:** your preferences in receiving marketing information or other communication from us

We may also collect, use, store and share **Aggregated data**. This is statistical or demographic information. It can be derived from your personal data but is not considered personal data in this law as it does **not** directly or indirectly reveal your identity.

We do not collect any **Special categories of personal data** online, which includes details about race, ethnicity, religion, philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health information, genetic or biometric data. Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Personal data is only collected and used by law, under the terms of a contract we have with you, for the sake of creating a user-friendly experience, to communicate with you and to processing applications you have filed with us. If you fail to provide the requested data we may not be able to perform the contract we have or are trying to enter into with you.

3. How we collect and use your personal data and when we delete it

There are a few different areas where we may collect personal data from you online which include:

- When you sign up to our newsletter (collection, use, deletion)
You must provide us with your email address in order to receive our newsletter dBrief. We use this information to send you the newsletter. This personal data and your profile in our

system will be erased if you unsubscribe from our list or declare a cease in interest.

Aggregated data may be retained for the sake of analysis.

- When you fill out a contact us form (collection, use, deletion)

When you fill out a Contact Us form on our website you are required to provide us with a first name, a last name, an email address and information on your passport country. We use this information to communicate with you about courses you have stated an interest in and to make sure you are aware of visa issues for studying with us. This personal data and your profile in our system will be erased if you unsubscribe from our list or declare a cease in interest. Aggregated data may be retained for the sake of analysis.

- When you contact us through third-parties (collection, use, deletion)

If you send us a message through one of our social platforms pages (Facebook, Instagram, Vimeo, Youtube, Twitter, Snapchat, Google+) we might be able to see your profile information which may contain personal data. This information is not transferred to any of our databases but may be used by our staff to provide you with relevant information (such as visa information if you have your location information). We will delete any conversation history upon request.

If you contact us through an external website where we have listed our course offers, any information you provide the third-party through their form will be accessible to us. We use this information to communicate with you about your course interest. This personal data and your profile in our system will be erased if you unsubscribe from our list or declare a cease in interest. Aggregated data may be retained for the sake of analysis.

- When you register to attend an Open Day (collection, use, deletion)

If you would like to visit us we suggest registering for an Open Day. To register you must provide us with your first name, last name, and email address. We use this information to communicate with you about your Open Day and to mark your attendance. This personal data and your profile in our system will be erased if you unsubscribe from our list or declare a cease in interest. Aggregated data may be retained for the sake of analysis.

- When you apply to one of our courses (collection, use, deletion)

When you are interested in applying to and enrolling in a course with us, we must collect information from you to determine your eligibility. This information is collected through a range of means which can include: the use of online application forms, online surveys, online interviews, phone calls, paying invoices, in-person visits, and direct email messaging. The personal data we collect for the sake of your application can include: first name, last name, physical address, phone number, emergency contact name, emergency contact phone number, emergency contact relationship to you, your passport information, date of birth, email address, proof of your academic qualifications, your skills in various technical areas of

creative production, information about your interests, and bank account information. This privacy policy applies to all data being collected for the purposes of an applicant joining a course. Once an applicant becomes a student it is necessary to transfer their personal data to our university partner to enrol them on any courses that are subject to their validation. Details for these processes can be found in our Student Agreement.

Personal data required for admissions is deleted once 2 years has passed since the applicant either left their course or their application. This term can be shortened by direct request by the applicant. Aggregated data may be retained for the sake of analysis.

- When you fill out a form to be recorded by us (collection, use, deletion)

If a musical group has the desire to be recorded by our students in our facilities we may collect information on the group. This information may or may not be personal data that could lead back to a single individual. It is collected via a form on our website and in order for us to contact the musical group, we need at least an email address. We use this information to communicate with you about your recording. Any personal data for this will be erased upon request.

- When you apply for a job with us (collection, use, deletion)

If you would like to work with us you are required to provide us information on your first and last name, email address, information on your academic qualifications, expertise or interest, a CV of relevant work experience, statements on your motivations on working with us, physical address, telephone number, date of birth, nationality, and gender. This information can be collected through the use of online forms, direct email messaging, phone calls, in-person interviews, online interviews, printed forms. We use this information to determine your candidacy for the role as well as fulfill the legal requirements of our employment processes. Any personal data for this and your profile can be deleted upon request.

- Or when you use this website (collection, use, deletion)

When you interact with our website, personal data may be collected and used only for the sake of establishing, modifying or continuing a relationship with you. There is additional information we gather to assess the experience our users are having online which can be gathered through server log files, google universal analytics and cookies. This data might include user characteristics such as: names, IP addresses, email address; data which shows when the user began and ended their visit as well as and which pages they interacted with; and data about how, when and where the user visited our website. The purpose of this data is to assess and improve the online experience and to guide our retargeting marketing campaigns online. If you visit our website and use the google search engine or Facebook/Instagram platforms, a cookie may allow you to see ads from us. Cookies are small text files, which are saved to your device. Generally, you can choose in your browser

preferences if and which cookies may be saved to your device. Through the web services www.youronlinechoices.com (EU) and www.aboutads.info/choices (US) you can determine which cookies you allow for online ads and which you want to block.

Change of purpose

Your personal data will only be used for the purposes for which we collected it. However, if we reasonably consider that we need it for another reason which is compatible with the original purpose, we may do so. We are more than happy to provide you with a rationale for doing so at your request.

If we need your personal data for another unrelated purpose we will notify you and explain the legal basis for doing so.

Criminal prosecution

It is possible that we could be contacted by the police authorities of the German Länder for a case involving criminal prosecution. In this situation we are obliged to provide information for their purposes.

4. Disclosures of your personal data

We may be obliged to share your personal data with the parties listed below for the purposes stated above in section 3.

- **External consultant services**

We have projects that employ the services of expert consultants in connection with our online marketing activities and our website. For these projects we grant them access only to anonymous and aggregated data.

- **The University of St. Mark & St. John**

Our courses are validated and distributed by our university partner in the UK. Any information about assessments, assignments, projects, presentations, student progress, exams, submissions, personal information, attendance and feedback on course curriculum may be transferred to them. This is to fulfil the contract of enrolment on a course that is validated by them and delivered by us.

- **Bill collectors**

In the event that a breach of payment contract has occurred between a student and us, we have the right to pass on their information to a third party bill collector service. More information about the details about finances can be found on our Payment Contract which students who are successfully enrolled are required to sign to participate in their course.

We require all third parties to maintain the security of your personal data and treat it according to what the law stipulated. Our external third parties must never, under any circumstances, use data which was collected or processed on our behalf for their own purposes.

International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

Data Security

We have installed appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data so it is used only by staff, contractors or third parties who need to know. For these actions, 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 any relevant regulator of a breach where we are legally required to do so.

Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it and for satisfying legal, accounting, or reporting obligations. We determine the appropriate period of time for retaining personal data by considering the amount, nature, and sensitivity of that personal data, the potential risk for harm by 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, as well as legal requirements. You may request details on the retention periods for different aspects of your personal data by contacting us.

8. Your legal rights

Under certain circumstances, you have rights under data protection laws relating to your personal data. You have the right to be informed about the personal data we have on record. This also applies to the right to correct, block, object to the processing of, request a restriction to the processing of, request the transfer of, or request the erasure of your data.

No fee usually required

Accessing your personal data that we have on record (or to exercise any of the other rights stated above) will be free of charge. However, we may charge a reasonable fee if your request is unfounded, repetitive or excessive. We may also refuse to comply with your request in these circumstances

What we may need from you

It might be required to request specific information from you in order to confirm your identity and carry out your request. This is a security measure.

Time limit to respond

We try to respond to all legitimate requests within one month of receipt. Occasionally it could take us longer if the request is complex or there is a large number of them. In this case we will notify you and keep you informed.

Contact details

Company name: dBs Berlin GmbH

Title: Admissions & Student Admin

E-mail: admissions[at]dbsberlin[dot]net,

Address: Nalepastraße 18, 12459 Berlin, Germany

Telephone: +49 30 2900 9052